

ALEXANDER
CAPITAL ADVISORS, LLC

125 Elm Street
New Canaan, CT 06840
(203) 966-7707
<https://alexandercapitaladvisors.com>

Firm Brochure
(Part 2A of Form ADV)
December 9, 2024

This brochure provides information about the qualifications and business practices of Alexander Capital Advisors, LLC (“ACA” or the “Firm”). If you have any questions about the contents of this brochure, please contact us at (203) 966-7707, or email Thomas F. Paolozzi III, President, at tfp@alexcapadv.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (the “SEC”), or by any state securities authority.

Additional information about ACA is available on the SEC’s website at www.adviserinfo.sec.gov.

Registration with the SEC as an investment adviser does not imply that ACA or any of its associated persons possesses a particular level of skill or training in the investment advisory business or any other business.

Item 2 – Summary of Material Changes

Since its previous updating amendment, ACA has withdrawn from registration as an investment adviser with the State of Connecticut, and has registered with the SEC.

Item 3 – Table of Contents

Item 2 – Summary of Material Changes.....	2
Item 3 – Table of Contents	3
Item 4 – Advisory Business	4
Item 5 – Fees and Compensation	5
Item 6 – Performance Based Fees and Side-By-Side Management.....	6
Item 7 –Types of Clients	7
Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss.....	8
Item 9 – Disciplinary Information	10
Item 10 – Other Financial Industry Activities and Affiliations	11
Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	11
Item 12 – Brokerage Practices	12
Item 13 – Review of Accounts	14
Item 14 – Client Referrals and Other Compensation	14
Item 15 – Custody.....	14
Item 16 – Investment Discretion	15
Item 17 – Voting Client Securities.....	15
Item 18 – Financial Information.....	15

Item 4 – Advisory Business

A. Alexander Capital Advisors, LLC, founded in March 2006 by Thomas F. Paolozzi III, the Firm's sole owner, is an SEC-registered investment adviser located in New Canaan, Connecticut.

B. ACA provides discretionary investment management services to individuals, high net worth individuals, trusts, estates, and corporations and other business entities ("Clients") on a wrap-fee basis, pursuant to the terms and conditions of its wrap-fee program. We do not provide financial planning or insurance planning services. If specifically requested by a Client, we may provide limited consultation services to on investment and non-investment related matters. Any such consultation services, to the extent rendered, will be rendered exclusively on an unsolicited basis, for which we shall not receive any separate or additional fee.

ACA also serves as the general partner of a private fund, The Plato Fund L.P. (the "Fund"), and provides investment advice to the Fund. The Fund is a hedged long-only value fund that seeks investment opportunities in U.S. listed companies predominately found in the Russell 2000 Index. The investment strategy of the Fund differs from the strategy we typically apply for other Client accounts and may be a suitable investment for a portion of a Client's account.

ACA offers advice to its Clients on the advisability of investing in the Fund but does not cause a Client's assets to be invested in the Fund except at the direction of the Client. Interests in the Fund are privately offered only to "qualified clients" as defined below in **Item 6 – Performance Based Fees and Side-By-Side Management**.

The Fund relies on an exemption from registration under the Investment Company Act of 1940.

Investment in the Fund involves a significant degree of risk. All relevant information, terms and conditions relative to the Fund, including the management fee and incentive fee, suitability, investment strategy, risk factors, and potential conflicts of interest, are set forth in the Private Offering Memorandum, Limited Partnership Agreement, and Subscription Agreement, which each subscriber is required to execute prior to being accepted as a limited partner of the Fund.

Since ACA has a financial interest in the Fund, an investment in the Fund presents a conflict of interest for the Firm.

C. Other than with respect to its investment advice to the Fund, ACA provides continuous advice to each Client regarding the investment of Client funds based on the individual needs of the Client. Through personal discussions in which goals and objectives based on a Client's circumstances are established, we develop an understanding of each Client's risk tolerance and create and manage a portfolio based on such. We will manage advisory accounts on a discretionary basis only. Account supervision is guided by the stated objectives of the Client (*i.e.*, conservative total return, moderate total return, or aggressive total return).

ACA will create a portfolio consisting of one or all the following: individual equities, ETFs, bonds, other investment products, and no-load or load-waived mutual funds. ACA will allocate the Client's assets among various investments taking into consideration the financial objectives of the Client. The mutual funds will be selected based on any or all the following criteria: the fund's performance history; the industry sector in which the fund invests; the track record of the fund's manager; the fund's investment objectives; the fund's management style and philosophy; and the fund's management fee structure.

Portfolio weighting between funds and market sectors will be determined by each Client's individual needs and circumstances as well as market conditions. Clients will have the opportunity to place reasonable restrictions on the types of investments which will be made on the Client's behalf. Clients will retain individual ownership of all securities.

When appropriate to the needs of the Client, ACA may recommend the use of short-term trading (securities sold within thirty (30) days), short sales, margin transactions or option writing. Because these investment strategies involve certain additional degrees of risk, they will only be recommended when consistent with the Client's stated tolerance for risk.

D. ACA is the sponsor and investment manager of the ACA Wrap-Fee Program (hereinafter the "Program"). A "wrap-fee" program provides the Client with advisory and brokerage execution services for one all-inclusive fee. Except as described below, a Client participating in the Program is not charged separate fees for the respective components of the total service. To participate in the Program, all our Clients must direct the use of TD Ameritrade Institutional ("TDI") to act as broker and custodian for their securities transactions. Participants in the Program are directed to the ACA Wrap-Fee Brochure for additional information regarding the Program.

E. ACA manages all Client accounts on a discretionary basis. As of December 10, 2024, the Firm had a total of \$100,197,000 assets under management on a discretionary basis and no assets on a non-discretionary basis.

Item 5 – Fees and Compensation

A. ACA is a fee-based advisor, with fees based upon a percentage of the dollar value of the assets under management. In certain circumstances, fees and account minimums may be negotiable.

ACA charges an advisory fee of 1.35% of assets under management, except for those accounts described in **Item 6 – Performance Based Fees and Side-By-Side Management**.

Investors in the Fund are subject to an asset-based management fee and a performance fee, as described in the Private Offering Memorandum of the Fund.

B. The Client's written agreement with ACA establishes that Client accounts will be debited by the custodian in advance for the advisory fee on a quarterly basis. These dates may vary at the discretion of the Firm. The amount of the advisory fee will be based upon the value (market value or fair market value in the absence of market value) of the Client's account on the month end prior to the payable date.

Advisory fees are clearly shown as a separate line item on each Client's monthly statement from the custodian.

The fee charged is calculated as described above and is not charged based on a share of capital gains upon or capital appreciation of the funds or any portion of the funds of a Client, except for those accounts described in **Item 6 – Performance Based Fees and Side-By-Side Management**.

C. The fee includes all advisory and brokerage execution services. The fee does not include interest charges, electronic fund and wire transfer fees, American Depositary Receipt agency processing fees, and any charges, taxes or other fees mandated by any federal, state or other applicable law. The fee also does not include internal management fees and fund expenses charged by mutual funds and ETFs.

D. A Client has the right to terminate its advisory agreement without penalty within five (5) business days after entering into the agreement. Furthermore, an advisory agreement may be canceled at any time, by either party, for any reason upon receipt of written notice. Since ACA's fees must be paid in advance, upon termination of any account, any prepaid, unearned fees will be refunded within ninety (90) days, prorated as described below.

The prorated refund is determined by verifying the date of termination and is based upon the number of months remaining in the current billing quarter. The fraction of prepaid quarterly fees to be refunded is calculated with the following formula:

$$\frac{(1, 2, \text{ or } 3) \text{ Number of months left in current quarter}}{(3) \text{ Number of months in quarter}} \times \$ \text{ Fees Paid} = \$ \text{ Refund}$$

E. ACA and its employees do not receive any compensation for the sale of securities or other investment products, including mutual funds.

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

Performance based fee arrangements may create an incentive for an advisor to recommend investments which may be riskier or more speculative than those which would be recommended under a different fee arrangement. Such fee arrangements also create an incentive to favor higher fee-paying accounts over other accounts in the allocation of investment opportunities. As discussed below, ACA has procedures designed and implemented to ensure that all Clients are treated fairly and equally, and to prevent this conflict from influencing the allocation of investment opportunities among Clients.

ACA provides investment advice to a variety of Clients. We may entertain requests by certain "qualified clients" (as defined in Rule 205-3(d) under the Investment Advisers Act of 1940, as amended) to enter into an advisory agreement that provides for compensation based on a share of the capital gains upon, or the capital appreciation of, the qualified client's assets under management or account. This is referred to as a "performance fee." As described below, this may present an incentive to favor one account over another, and thus a conflict of interest. At this time, ACA does not charge a performance fee to any Client other than the Fund, as described below.

ACA charges all Clients, other than as described in this section, a fee calculated as a percentage of assets under management. Clients who are invested in the Fund pay a management fee and an incentive fee, which is a performance-based fee. Given that we manage both separately managed accounts and a pooled investment vehicle, the Firm has an incentive to favor the Fund (and performance-based fee accounts); this conflict of interest is addressed in the Firm's Policies and Procedures/Code of Ethics. Specifically, limitations are placed upon the timing of trades in the Fund relative to those in other Client accounts, and all trades are reviewed monthly to ensure adherence to these procedures.

The Plato Fund

Some of the Firm's Clients have elected to invest in The Plato Fund, L.P., to which ACA acts as the general partner and provides investment advice. The Fund charges its limited partners a management fee and a performance-based incentive fee. Performance fees are currently 20% of each partner's net new profits, assessed annually on March 31, with a high watermark.

For example:

Year 1 – Partner A's initial investment is \$100,000

March 31 value: \$120,000

Performance fee: \$120,000 less \$100,000 = \$20,000 x 20% = **\$4,000**

Year 2

March 31 value: \$100,000

Performance fee: \$0 (\$120,000 is the high watermark)

Year 3

March 31 value: \$150,000

Performance fee: \$150,000 less \$120,000 = \$30,000 x 20% = **\$6,000**

Performance based fee arrangements may create an incentive for an advisor to recommend investments which may be riskier or more speculative than those which would be recommended under a different fee arrangement.

Item 7 –Types of Clients

ACA provides portfolio management services to individuals, high net worth individuals, pension and profit-sharing plans, trusts, estates, corporations or business entities, and the Fund.

ACA requires a minimum of \$1,000,000 of assets under management, calculated by household, although this is negotiable under certain circumstances (i.e. anticipated future earning capacity, anticipated future additional assets, related accounts, account composition, etc.). We group related Client accounts (households) for the purposes of achieving the minimum size requirement.

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

ACA was formed to provide superior portfolio management with a focus towards value.

A. ACA uses various securities analysis methods as the basis for its investment strategies. The Firm derives information from a variety of sources, including financial newspapers and magazines, inspections of corporate activities, research materials prepared by others, corporate rating services, annual reports, prospectuses, filings with the SEC, company press releases, as well as other various independent analyses.

The investment strategies used to implement any investment advice given to Clients include, but are not limited to, long term purchases (securities held at least a year), short term purchases (securities sold within a year), and when appropriate to the needs of the Client, we may recommend the use of short term trading (securities sold within thirty (30) days), margin transactions or option writing. Because these

investment strategies involve certain additional degrees of risk, they will only be recommended when consistent with the Client's stated tolerance for risk. Through our association with TDAL, Clients can and sometimes do receive institutional class mutual funds as part of their portfolio construction.

Comprehensive research, disciplined value-based strategy, absolute return focus and low portfolio volatility frame every investment decision at ACA. We search for well-managed companies and securities that are temporarily priced below their true longer-term value. Securities in our Clients' portfolios share many of the following attributes:

- Increasing cash flow and operating margins
- Attractive price to book value
- Increasing insider and management ownership
- Unique balance sheet characteristics
- Leadership changes among business lines within the company
- Known company board or management
- Business plans and strategies that consider equity and profitability

ACA concentrates on companies and securities with market capitalizations between \$400 million and \$4 billion.

Investing in securities involves risk of loss that Clients should be prepared to bear.

B. We generally aim to create well diversified portfolios for Clients, constructed to each Client's individual risk tolerance. The investment strategies used on behalf of our Clients' accounts may cover a wide range of investment types. Certain risks applicable to our management of our Clients' assets are described below.

Risks Associated with Securities Investments Generally. Investing in securities involves a variety of risks, including the loss of capital. The value of any such investments will depend upon many factors beyond our control. The securities markets generally are affected by, among other things, the state of the economy, inflation rates and unemployment, trade, fiscal and monetary policies and national and international political and economic events. All securities investments risk the loss of capital. The nature of the securities to be purchased and traded and the investment techniques and strategies we employ may increase this risk.

Investing Generally. Our investment strategies are designed for investors seeking potential long-term growth from investments, who do not require regular current income and who can accept a high degree of risk in their investments. In view of, among other things, our ability to invest in a wide range of securities and instruments on behalf of our Clients' accounts and to use a broad variety of investment techniques, our investment management services may be deemed speculative in nature and are not intended to be a comprehensive investment program. No assurance can be given that our Clients will achieve their investment objectives or that our investment strategies will be successful.

Institutional Risk. The institutions, including brokerage firms and banks, with which our Clients' accounts trade or invest, may encounter financial difficulties that impair the operational capabilities or the capital position of such accounts. Institutions performing services for our Clients' accounts may encounter financial difficulties that impair their operational capabilities. In such event, there is a risk that our Clients' accounts could be faced with trading or settlement delays and/or portfolio losses.

Non-Diversification and Concentration. Diversifying an investment portfolio can reduce the risks of investing. This may include limiting the amount of money invested in any one company or, on a broader scale, limiting the amount invested in any one industry or geographic region. To retain flexibility, certain Client accounts may be non-diversified. In addition, the size of a portfolio may limit our ability to achieve the desired level of diversification in such portfolio. To the extent a significant portion of a portfolio is invested in a few issuers' securities, the performance of the portfolio could be significantly affected by the performance of those issuers. In addition, an investment portfolio with limited diversification may be subject to more rapid change in value than would be the case if the portfolio were required to maintain a wide diversification among industries, areas, types of securities and issuers, and will not have the protection against risk that diversification provides.

Equity Risks. The value of equity securities generally will vary with the performance of the issuer and movements in the equity markets. As a result, a Client's account may suffer losses if it invests in equity securities of issuers whose performance diverges from our expectations or if equity markets generally move in a single direction and the Client's account has not been hedged against such a general move. To the extent a Client's account invests in equity derivatives and private placements activities, the Client's account will be exposed to risks that issuers will not fulfill their contractual obligations, such as delivering marketable common stocks upon conversions of convertible securities and registering restricted securities for public resale.

Price Volatility. Equity securities are inherently volatile investments. Such volatility may result in the value of a portfolio holding such securities fluctuating from time-to-time more greatly than those of other portfolios which may hold fewer equity securities. There can be no assurance that our investment strategy, including our hedging techniques, or other investment strategies or techniques, will be effective in protecting our Clients' accounts from such price volatility.

Investments with Limited or No Liquidity. Our Clients' accounts may take positions in certain securities that are relatively large as compared to the trading volume of such securities or overall market capitalization of the applicable issuers. Such positions may at times prove more difficult to sell in a timely or efficient manner and could thus impair to some extent the ability to fully realize portfolio gains or limit losses. We generally do not intend to limit investments to issuers of any minimum capitalization and may, in fact, focus upon smaller capitalization stocks when such securities appear to afford greater appreciation potential. Such stocks often have less liquidity than large capitalization issues.

Call Options. The seller (writer) of a call option that is covered (e.g., the writer holds the underlying security) assumes the risk of a decline in the market price of the underlying security below the purchase price of the underlying security less the premium received and gives up the opportunity for gain on the underlying security above the exercise price of the option. The seller of an uncovered call option assumes the risk of a theoretically unlimited increase in the market price of the underlying security above the exercise price of the option. The securities necessary to satisfy the exercise of an uncovered call option may be unavailable for purchase, except at much higher prices, thereby reducing or eliminating the value of the premium. The buyer of a call option assumes the risk of losing the entire premium investment in the call option.

Put Options. The seller (writer) of a put option which is covered (e.g., the writer has a short position in the underlying security) assumes the risk of an increase in the market price of the underlying security above the sales price (in establishing the short position) of the underlying security plus the premium received, and gives up the opportunity for gain on the underlying security if the market price falls below

the exercise price of the option. The seller of an uncovered put option assumes the risk of a decline in the market price of the underlying security below the exercise price of the option. The buyer of a put option assumes the risk of losing the entire investment in the put option.

Leverage; Interest Rates; Margin. (ACA very rarely uses these strategies). We expect to utilize leverage on behalf of our Clients' accounts on a very selective basis, as we consider appropriate, primarily for investment purposes to increase investment positions or to make additional investments. Leverage may be employed by means of conventional margin arrangements, or through options, swaps, forwards and other derivative instruments (*i.e.*, so called "synthetic" leverage). While leverage (including the use of derivatives) presents opportunities for increasing total return, it has the effect of potentially increasing losses as well. The effect of the use of leverage in a market that moves adversely to the investments of the entity employing the leverage, could result in a loss that would be greater than if leverage were not employed. In addition, the interest of borrowings will affect operating results.

The use of short-term borrowings may result in certain additional risks. For example, should the securities that are pledged to brokers to secure margin accounts decline in value, or should brokers increase their maintenance margin requirements (*i.e.*, reduce the percentage of a position that can be financed), then borrower could be subject to a "margin call," pursuant to which the borrower must either deposit additional funds with the broker or suffer mandatory liquidation of the pledged securities to compensate for the decline in value.

Limitations on Shorting and Hedging Strategies. We may employ certain hedging techniques directed primarily toward general market risks. Hedging against a decline in the value of a portfolio position does not eliminate fluctuations in the values of portfolio positions or prevent losses if the values of such positions decline, but establishes other positions designed to gain from those same developments, thus moderating the decline in the overall portfolio value. Such hedge transactions, however, also limit the opportunity for gain if the value of the portfolio position should increase. In addition, the degree of correlation between price movements of the instruments used in a hedging strategy and price movements in the portfolio position being hedged may vary. Insufficient correlation between hedged and hedging positions may not only result in failing to protect against risks sought to be hedged but may increase the magnitude of overall loss in the event of losses in the hedging positions.

For a variety of reasons, we may not seek or be able to establish a sufficiently accurate correlation between such hedging instruments and the portfolio holdings being hedged. Moreover, we may not necessarily endeavor to hedge a portfolio whatsoever. In the event hedging is utilized, it will be employed, in general, solely as a technique to limit certain market risks. As a general matter, a portfolio will still be exposed to basic issuer risk and other risks attendant to its investment strategy and to positions, which risks will not be generally hedged.

Item 9 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of them or the integrity of their management.

ACA has no legal or disciplinary events to disclose.

Item 10 – Other Financial Industry Activities and Affiliations

A. ACA and its management persons are not registered as broker-dealers or representatives of a broker-dealer and do not have any applications pending to register as broker-dealers or as representatives of a broker-dealer.

B. ACA and its management persons are not registered, nor have an application pending to register, as a futures commission merchant, commodity pool operator, commodity trading advisor, or an associated person of the foregoing entities.

C. As described previously in **Item 6 – Performance Based Fees and Side-By-Side Management**, ACA serves as general partner of the Fund. ACA and the Fund are under common control of Thomas F. Paolozzi III, the President and Chief Compliance Officer of the Firm. ACA provides investment advice to the Fund and offers advice to Clients on the advisability of investing in the Fund.

The nature of the conflict of interest resulting from this arrangement is further elaborated in **Item 6 – Performance Based Fees and Side-By-Side Management**, as well as the steps taken by the Firm to address those conflicts.

D. ACA does not recommend or select other investment advisors for its Clients, nor does it have any other business relationships with other investment advisors.

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

A. ACA has adopted a Code of Ethics that sets forth high ethical standards of business conduct we require of our employees, including compliance with applicable federal securities laws. The Firm's Code of Ethics also includes policies and procedures for the review of quarterly securities transactions reports as well as initial and annual securities holdings reports that must be submitted by the Firm's covered persons. The Code of Ethics also includes oversight, enforcement and recordkeeping provisions. A copy of ACA's Code of Ethics is available to our Clients or any prospective Client upon request to Thomas F. Paolozzi III at our principal office address.

B. ACA recommends to Clients that they buy or sell securities in which the Firm has some financial interest. Specifically, as described previously in **Item 6 – Performance Based Fees and Side-By-Side Management**, ACA acts as the general partner to the Fund and offers advice to its Clients on the advisability of investing in The Fund. As this represents a conflict of interest, the Firm's Code of Ethics places limitations upon the timing of trades in the Fund relative to those in Client accounts and requires ongoing review of trades to ensure compliance with these procedures.

C. ACA buys or sells for its related persons securities that it also recommends to Clients. The Firm places such securities on its "Restricted List" and prohibits the purchase or sale of such securities by the Fund on the same trading day as any transaction in that security is effected for any other Client accounts. A record of all trades placed in Client accounts, including the Fund, is reviewed quarterly to ensure adherence to these procedures.

D. See paragraph C above.

Item 12 – Brokerage Practices

ACA requires that Clients direct the Firm to place all trades through TDAI. We have evaluated TDAI and believe that TDAI will provide our Clients with a blend of execution services, commission costs and professionalism that will assist us in obtaining best execution for transactions. While we have a reasonable belief that TDAI can obtain best execution and competitive prices, we will not be independently seeking best execution price capability through other broker dealers. ACA reserves the right to decline acceptance of any Client account that directs the use of a broker dealer other than TDAI.

While there are numerous benefits to Clients relative to our exclusive use of TDAI as a broker-dealer, there is also an incentive to select TDAI based upon our interests rather than our Clients' interests.

A. The Custodian and Broker We Use

ACA does not maintain custody of your assets that we manage, although we may be deemed to have custody of your assets for regulatory purposes if you give us authority to withdraw assets from your account (see **Item 15 – Custody**). Your assets must be maintained in an account at a "qualified custodian," generally a broker-dealer or bank. Except for an alternative investment position held in some Client IRA accounts which are custodied at Millennium Trust Company, we require that our Clients use TDAI as the qualified custodian. We are independently owned and operated and are not affiliated with TDAI. TDAI will hold your assets in a brokerage account and buy and sell securities when we instruct them to. While we require that you use TDAI as custodian/broker, you will decide whether to do so and will open your account with TDAI by entering into an account agreement directly with them. We do not open the account for you, although we will assist you in doing so. If you do not wish to place your assets with TDAI, then we reserve the right to decline acceptance of your account. Not all advisors require their clients to use a broker-dealer or custodian selected by the advisor. Even though your account is maintained at TDAI, we can still use other brokers to execute trades for your account as described below (see *"Your Brokerage and Custody Costs"*), although we do not actively seek to do so.

The Fund's assets are maintained at Northern Trust Securities, Inc.

How We Select Brokers/Custodians

We seek to use a custodian/broker who will hold your assets and execute transactions on terms that are, overall, most advantageous when compared to other available providers and their services. We consider a wide range of factors, including, among others:

- Combination of transaction execution services and asset custody services,
- Capability to execute, clear, and settle trades (buy and sell securities for your account),
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.),
- Breadth of available investment products (stocks, bonds, mutual funds, exchange-traded funds, etc.),
- Availability of investment research and tools that assist us in making investment decisions
- Quality of services,
- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.),
- Reputation, financial strength and stability,
- Prior service to us and our other clients, and

- Availability of other products and services that benefit us, as discussed below (see “*Products and Services Available to Us from TD Ameritrade Institutional (TDAI)*”).

Your Brokerage and Custody Costs

You are not charged separately for custody costs or brokerage costs on trades executed by TDAI. As described in **Item 4 – Advisory Business**, ACA sponsors a wrap fee program which provides the Client with investment advisory and brokerage execution and custody services for one all-inclusive fee.

We have determined that having TDAI execute trades is consistent with our duty to seek “best execution” of your trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above (see “*How We Select Brokers/Custodians*”).

Products and Services Available to Us from TD Ameritrade Institutional (TDAI)

As described above, ACA has an arrangement with TDAI through which TDAI provides us with TDAI’s “platform” services. The platform services include, among others, brokerage, custodial, administrative support, record keeping and related services that are intended to support intermediaries like us in conducting business and in serving the best interests of our Clients but that may also benefit us.

As part of the arrangement, TDAI makes available to us, at no additional charge to us, certain research and brokerage services, including research services obtained by TDAI directly from independent research companies, as selected by us (within specified parameters). These research and brokerage services presently include services such as mutual fund research and are used by us to manage accounts for which we have investment discretion.

We may also receive additional services which may include software and technology. Without this arrangement, we might be compelled to purchase the same or similar services at our own expense.

Because of receiving such services for no additional cost, we may have an incentive to continue to use or expand the use of TDAI’s services. We examined the potential conflict of interest when we chose to enter the relationship with TDAI and have determined that the relationship is in the best interests of our Clients and satisfies our Client obligations, including our duty to seek best execution. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker dealer’s services, including the value of research provided, execution capability, commission rates, and responsiveness. ACA and TDAI are not affiliates.

Since all our Client accounts use TDAI for custodial and brokerage services, there are no allocation issues related to benefits received because of our relationship with TDAI.

Although ACA may from time to time receive client referrals from TDAI, any such client referrals are not a factor in our continued selection and recommendation of TDAI as broker-dealer.

B. Aggregated Trades

ACA may block trades where possible and when advantageous to Clients. This blocking of trades permits the trading of aggregate blocks of securities composed of assets from multiple Client accounts. Block trading allows the Firm to execute equity trades in a more timely, equitable manner. No Client will be

avored over any other Client. Each Client that participates in an aggregated order will participate at the average share price for all Firm transactions in a given security on a given business day.

ACA does not block trades of the Fund with those of other Client accounts.

Item 13 – Review of Accounts

A. Account reviews are conducted on an ongoing basis by Thomas F. Paolozzi III, the President of the Firm. All Clients are advised that it remains their responsibility to advise ACA of any changes in their investment objectives and/or financial situation. All Clients are encouraged to review their investment objectives and account performance with us on an annual basis.

B. Accounts are reviewed following material deposits or withdrawals. Accounts may also be reviewed in conjunction with the purchase or sale of a position across all Client accounts.

C. Clients receive written reports as follows: Clients are provided with transaction confirmation notices and monthly account statements directly from the custodian. Clients also receive a written quarterly report from ACA summarizing account activity and performance. Clients are urged to compare the statements from TDAI with the quarterly reports received from us.

Item 14 – Client Referrals and Other Compensation

A. ACA receives an economic benefit from TDAI in the form of the support products and services it makes available to us and other independent investment advisors whose Clients maintain their accounts at TDAI. These products and services, how they benefit us, and the related conflicts of interest are described in **Item 12 – Brokerage Practices**. The availability to us of TDAI's products and services is not based on us giving investment advice, such as buying securities for our Clients.

B. ACA does not compensate any outside party for Client referrals.

Item 15 – Custody

Under government regulations, ACA is deemed to have custody of your assets if, for example, you authorize us to instruct TDAI to deduct our advisory fees directly from your account or if you grant us authority to move your money to another person's account. Our Clients grant us authority to debit fees directly from their accounts. We do not have the authority to move money between non-like accounts without our Clients' written authorization. All Clients receive account statements from their custodian, TDAI, monthly, which they should carefully review. ACA also sends quarterly performance reports to Clients, as described in **Item 13 – Review of Accounts**. These reports contain a legend that urges Clients to compare the information contained in our report to the statements they receive directly from the custodian.

ACA also acts as both general partner and investment adviser to the Fund, and is deemed to have custody of the assets of the Fund. As required, the Fund is audited annually by a Public Company Accounting Oversight Board (PCAOB) registered and inspected accounting firm, and the audited financial statements

are delivered to all investors of the Fund within one hundred twenty (120) days of the end of the Fund's fiscal year (the Fund's fiscal year end is March 31 of each year).

Item 16 – Investment Discretion

ACA requests that it be provided with written authority to determine which securities and the amounts of securities that are bought or sold. Any limitations that the Client desires to place on this discretionary authority must be agreed in writing. Clients may change/amend these limitations as required.

This written authority is granted in the advisory agreement signed by Clients and executed by Thomas F. Paolozzi III on behalf of ACA upon commencement of the advisory relationship.

Item 17 – Voting Client Securities

ACA does not vote Client proxies. Therefore, although we may provide investment advice relative to Client investment assets, our Clients maintain exclusive responsibility for (1) directing the way proxies solicited by issuers of securities beneficially owned by the Client shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other events pertaining to the Client's investment assets. The Client shall correspondingly instruct the custodian of the assets that all proxies and shareholder communications relating to the Client's investment assets should be sent directly to the Client from the issuer. Clients may contact us with any questions about a solicitation.

Item 18 – Financial Information

- A. ACA does not require or solicit prepayment of fees more than six (6) months in advance.
- B. ACA has discretionary authority over Client accounts. There are no financial conditions that are likely to impair our ability to meet contractual commitments to Clients.
- C. ACA has never been the subject of a bankruptcy petition at any time.
- D. ACA has no disciplinary events to disclose.
- E. ACA has no relationship or arrangement with any issuer of securities other than already disclosed in **Item 10 – Other Financial Industry Activities and Affiliations**.

ALEXANDER
CAPITAL ADVISORS, LLC

125 Elm Street
New Canaan, CT 06840

(203) 966-7707
<https://alexandercapitaladvisors.com>

Wrap Fee Program Brochure
(Part 2A of Form ADV)
December 9, 2024

This wrap fee program brochure provides information about the qualifications and business practices of Alexander Capital Advisors, LLC (“ACA” or the “Firm”). If you have any questions about the contents of this brochure, please contact us at (203) 966-7707, or email Thomas F. Paolozzi III, at tfp@alexcapadv.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (the “SEC”), or by any state securities authority.

Additional information about ACA is available on the SEC’s website at www.adviserinfo.sec.gov.

Registration with the SEC as an investment adviser does not imply that ACA or any of its associated persons possesses a particular level of skill or training in the investment advisory business or any other business.

Item 2 – Summary of Material Changes

Since its last annual update to the wrap fee program brochure, dated March 26, 2024, ACA has withdrawn from registration as an investment adviser with the State of Connecticut, and has registered with the SEC.

Item 3 – Table of Contents

Item 2 – Summary of Material Changes	2
Item 3 – Table of Contents	3
Item 4 – Services, Fees and Compensation	4
Item 5 – Account Requirements and Types of Clients.....	5
Item 6 – Portfolio Manager Selection and Evaluation.....	5
Item 7 – Client Information Provided to Portfolio Manager	7
Item 8 – Client Contact with Portfolio Manager.....	7
Item 9 – Additional Information	7

Item 4 – Services, Fees and Compensation

ACA is the sponsor and investment manager of the Alexander Capital Advisors, LLC Wrap-Fee Program (hereinafter the "Program"). A "wrap-fee" program is one that provides the Client with advisory and brokerage execution services for one all-inclusive fee. Except as described below, a Program Client is not charged separate fees for the respective components of the total service. To participate in the Program, our Clients must direct the use of TD Ameritrade Institutional (TDAI) to act as broker and custodian for Program account securities transactions.

ACA provides discretionary investment management services to individuals, high net worth individuals, trusts, estates, and corporations and other business entities ("Clients") on a wrap-fee basis, pursuant to the terms and conditions of its wrap-fee program. We do not provide financial planning or insurance planning services. If specifically requested by a Client, we may provide limited consultation services to on investment and non-investment related matters. Any such consultation services, to the extent rendered, will be rendered exclusively on an unsolicited basis, for which we shall not receive any separate or additional fee.

ACA provides continuous advice to each Client regarding investment of Client funds based on the individual needs of the Client. Through personal discussions in which goals and objectives based on a Client's circumstances are established, we develop a Client's suitability and risk tolerance levels, and create and manage a portfolio based on such. We will manage advisory accounts on a discretionary basis only. Account supervision is guided by the stated objectives of the Client (i.e., conservative total return, moderate total return, or aggressive total return).

ACA will create a portfolio consisting of one or all the following: individual equities, bonds, ETFs, other investment products, and no-load or load-waived mutual funds. We will allocate the Client's assets among various investments taking into consideration the financial objectives of the Client. The mutual funds will be selected based on any or all the following criteria: the fund's performance history; the industry sector in which the fund invests; the track record of the fund's manager; the fund's investment objectives; the fund's management style and philosophy; and the fund's management fee structure. Portfolio weighting between funds and market sectors will be determined by each Client's individual needs and circumstances as well as market conditions. Clients will have the opportunity to place reasonable restrictions on the types of investments which will be made on the Client's behalf. Clients will retain individual ownership of all securities.

When appropriate to the needs of the Client, ACA may recommend the use of trading (securities sold within 30 days), margin transactions or option writing. Because these investment strategies involve certain additional degrees of risk, they will only be recommended when consistent with the Client's stated tolerance for risk.

The annual fee for the Program is 1.35% of assets under management. In certain circumstances, fees may be negotiable. The wrap fee includes all advisory and brokerage costs (including transaction costs), quarterly performance reports, third party custodial fees and transfer taxes.

Each Client's written agreement with ACA establishes that Client accounts will be debited by the custodian in advance for the wrap fee (also known as "advisor's fee") on a quarterly basis as follows: January 1 for the period consisting of the first quarter, April 1 for the period consisting of the second quarter, July 1 for the period consisting of the third quarter, and October 1 for the period consisting of the fourth quarter.

These dates may vary at the discretion of the advisor. The amount of the fee will be based upon the value of the Client's account on the month end prior to the payable date.

In considering this Program, a prospective Client should be aware that the Program may cost a Client more than purchasing the services separately from other advisors or broker-dealers. The factors that should be considered by a prospective Client include the size of a Client's portfolio, the nature of the investments to be managed, commission costs, custodial expenses, if any, the anticipated level of trading activity and the amount of advisory fees for only managing the Client portfolio.

The Program's wrap fee does not include interest charges, electronic fund and wire transfer fees, The American Depository Receipt agency processing fees, and any charges, taxes or other fees mandated by any federal, state or other applicable law. The wrap fee also does not include internal management fees and fund expenses charged by mutual funds and ETFs.

ACA and its President receive compensation because of the Client's participation in the Program as described above. We offer no alternative investment advisory or wrap program; therefore, we receive no additional compensation because of our Clients' participation in this Program. There is no conflict of interest associated with recommending the Program to our Clients as it is the only Program available. Clients should understand that similar advisory services may be available from other state registered investment advisors for higher or lower fees.

Item 5 – Account Requirements and Types of Clients

ACA provides portfolio management services to individuals, high net worth individuals, pension and profit-sharing plans, trusts, estates, corporations or business entities, and a private investment fund (The Plato Fund, L.P.).

ACA requires a minimum of \$1,000,000 of assets under management, calculated by household, although this is negotiable under certain circumstances (i.e. anticipated future earning capacity, anticipated future additional assets, related accounts, account composition, etc.). We group related Client accounts (households) for the purposes of achieving the minimum size requirement.

Item 6 – Portfolio Manager Selection and Evaluation

ACA is the sole investment manager for the Program and does not consider third-party investment managers for the Program.

Thomas F. Paolozzi III, owner of Alexander Capital Advisors, LLC, is the sole portfolio manager of Client accounts and makes all investment decisions.

Advisory Business

See **Item 4 – Advisory Business.**

Performance-Based Fees and Side-By-Side Management

Performance based fee arrangements may create an incentive for an advisor to recommend investments which may be riskier or more speculative than those which would be recommended under a different fee arrangement. Such fee arrangements also create an incentive to favor higher fee-paying accounts over other accounts in the allocation of investment opportunities. As discussed below, ACA has procedures designed and implemented to ensure that all Clients are treated fairly and equally, and to prevent this conflict from influencing the allocation of investment opportunities among Clients.

In addition to managed accounts, ACA provides investment advice to a private investment limited partnership known as The Plato Fund, L.P. (the “Fund”), for which ACA acts as the General Partner. The Fund is not available through the Wrap-Fee Program.

ACA charges all Wrap-Fee Clients a percentage of assets under management. Partners in Fund are charged a management fee and a performance-based incentive fee. Given that ACA manages both types of accounts, and there is an incentive to favor those that pay a performance-based incentive fee, this conflict of interest is addressed in the firm’s Policies and Procedures/Code of Ethics. Specifically, limitations are placed upon the timing of trades in the Fund relative to those in other Client accounts, and all trades are reviewed monthly to ensure adherence to these procedures.

Methods of Analysis, Investment Strategies and Risk of Loss

ACA uses various security analysis methods as the basis for its investment strategies. This information is derived from financial newspapers and magazines, inspections of corporate activities, research materials prepared by others, corporate rating services, annual reports, prospectuses, filings with the SEC, company press releases, as well as other various independent analyses.

The investment strategies used to implement any investment advice given to Clients include, but are not limited to, long term purchases (securities held at least a year), short term purchases (securities sold within a year), and when appropriate to the needs of the Client, ACA may recommend the use of trading (securities sold within 30 days), short sales, margin transactions or option writing. Because these investment strategies involve certain additional degrees of risk, they will only be recommended when consistent with the Client’s stated tolerance for risk. Through our association with TD Ameritrade Institutional (TDAI), Clients can and sometimes do receive institutional class funds as part of their portfolio construction.

Comprehensive research, disciplined value-based strategy, absolute return focus and low portfolio volatility frame every investment decision at Alexander Capital Advisors, LLC. We search for well-managed companies and securities that are temporarily priced below their true longer-term value. Securities in our portfolio share many of the following attributes:

- Increasing cash flow and operating margins
- Attractive price to book value
- Increasing insider and management ownership
- Unique balance sheet characteristics

- Leadership changes among business lines within the company
- Known company board or management
- Business plans and strategies that consider equity and profitability

ACA concentrates on companies and ETFs with market capitalizations between \$400 million and \$4 billion.

Investing in securities involves risk of loss that Clients should be prepared to bear.

Voting Client Securities

ACA does not vote Client proxies. Therefore, although we may provide investment advice relative to Client investment assets, our Clients maintain exclusive responsibility for (1) directing the way proxies solicited by issuers of securities beneficially owned by the Client shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the Client's investment assets. The Client shall correspondingly instruct the custodian of the assets that all proxies and shareholder communications relating to the Client's investment assets should be sent directly to the Client from the issuer. Clients may contact us with any questions about a solicitation.

Item 7 – Client Information Provided to Portfolio Manager

As previously indicated, Thomas F. Paolozzi III serves as President of ACA and manager of all Client portfolios. He is therefore privy to all significant Client information which is typically provided at the inception of the Client relationship. Client investment goals and risk tolerance are confirmed annually, and Clients are urged in writing to update us promptly if there are changes to their financial condition.

Item 8 – Client Contact with Portfolio Manager

Client contact with Thomas F. Paolozzi III is not restricted in any way. Phone calls are always accepted, and face- to-face meetings are encouraged on an annual basis if possible.

Item 9 – Additional Information

A. Disciplinary Information. ACA has no legal or disciplinary events to disclose.

Other Financial Industry Activities and Affiliations

ACA and its management persons are not registered as a broker-dealer or representative of a broker-dealer and do not have any applications pending to register as a broker-dealer or as a representative of a broker-dealer.

ACA and its management persons are not registered, nor have an application pending to register, as a futures commission merchant, commodity pool operator, commodity trading advisor, or an associated person of the foregoing entities.

As described previously in **Item 6 - Portfolio Manager Selection and Evaluation**, ACA serves as General Partner to a private investment limited partnership known as The Plato Fund L.P. (the Fund). ACA and The

Plato Fund, L.P. are under common control of Thomas F. Paolozzi III, President, and Chief Compliance Officer. ACA provides investment advice to the Fund and offers advice to Clients on the advisability of investing in the Fund.

The nature of the conflict of interest resulting from this arrangement is further elaborated in **Item 6 – Portfolio Manager Selection and Evaluation**, as well as the steps taken by the Firm to address those conflicts.

ACA does not recommend or select other investment advisers for its Clients, nor does it have any other business relationships with other investment advisers.

B. Code of Ethics, Participation or Interest in Client Transactions and Personal Trading. ACA has adopted a Code of Ethics that sets forth high ethical standards of business conduct that we require of our employees, including compliance with applicable federal securities laws. Our Code of Ethics also includes policies and procedures for the review of quarterly securities transactions reports as well as initial and annual securities holdings reports that must be submitted by our covered persons. The code also includes oversight, enforcement and recordkeeping provisions. A copy of Alexander Capital Advisors, LLC's Code of Ethics is available to our advisory Clients or any prospective Client upon request to Thomas F. Paolozzi III at our principal address.

ACA recommends to Clients that they buy or sell securities in which we have some financial interest. Specifically, as described in Item 6 – Portfolio Manager Selection and Evaluation previously, ACA acts as the General Partner to a private investment limited partnership known as The Plato Fund, L.P. and offers advice to its Clients on the advisability of investing in The Plato Fund, L.P. As this represents a conflict of interest, the Firm's Code of Ethics places limitations upon the timing of trades in the Fund relative to those in Client accounts and requires ongoing review of trades to ensure compliance with these procedures.

ACA buys or sells for its related persons securities that it also recommends to Clients. The Firm places such securities on its Restricted List and prohibits the purchase or sale of Restricted Securities in The Plato Fund, L.P. on the same trading day as any transaction in that security effected for any other Client accounts. A record of all trades placed in Client accounts, including The Plato Fund, is reviewed Quarterly to ensure adherence to these procedures.

C. Review of Accounts. Account reviews are conducted on an ongoing basis by Thomas F. Paolozzi III, President. All Clients are advised that it remains their responsibility to advise us of any changes in their investment objectives and/or financial situation. All Clients are encouraged to review investment objectives and account performance with the Firm on an annual basis.

Accounts are reviewed following material deposits or withdrawals. Accounts may also be reviewed in conjunction with the purchase or sale of a position across all Client accounts.

Clients are provided with transaction confirmation notices and monthly account statements directly from the custodian. Clients also receive a quarterly report from ACA summarizing account activity and performance. Clients are urged to compare these two reports.

D. Client Referrals and Other Compensation. ACA receives an economic benefit from TD Ameritrade Institutional (TDAI) in the form of the support products and services it makes available to us and other independent investment advisors whose Clients maintain their accounts at TDAI. The availability to us of

TDAI's products and services is not based on us giving investment advice, such as buying securities for our Clients.

ACA does not compensate any outside party for Client referrals.

E. Financial Information. ACA does not require or solicit prepayment of fees more than six months in advance.

ACA has discretionary authority over Client accounts. There are no financial conditions that are likely to impair our ability to meet contractual commitments to Clients.

ACA has never been the subject of a bankruptcy petition at any time.