



Atlantis Asset Management, LLC

Plain English Firm Brochure

Part 2A of Form ADV:

Dated: December 10, 2024

This brochure provides information about the qualifications and business practices of our firm Atlantis Asset Management LLC.

If you have any questions about the contents of this brochure, please contact us at Atlantis Asset Management LLC. Please also note that if you have received this document electronically via a computer connected to the internet, you may click on the information highlighted and underlined in blue.

Contact Information

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Additional information about Atlantis Asset Management LLC also is available on the SEC's website at www.adviserinfo.sec.gov.

Atlantis Asset Management is registered with the Securities & Exchange Commission. This will only imply that Atlantis Asset Management has filled out necessary forms on the IARD system which maintains our current disclosure information in a centralized location and does not imply a certain level of skill or training.

Please also note:

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.

Material Changes

There are no material changes in this brochure from the last annual updating amendment of Atlantis Asset Management LLC on June 27, 2024. Material changes relate to Atlantis Asset Management LLC policies, practices or conflicts of interests only.

Currently, our Brochure may be requested by contacting Michael Cohn, Chief Compliance Officer at 212-945-8501 or mcohn@atlantisasset.com. Additional information about Atlantis Asset Management is also available on the SEC's web site www.adviserinfo.sec.gov.

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Advisory Business

Item 4A

Atlantis Asset Management is a Fee-Based Investment Advisor. This means that we provide equity, fixed income, risk management and many other investment advisory and portfolio management services for a fee. This fee is an agreed upon percentage of assets under management.

Our advisory business was formed in the State of New York in 2009 under the name MDC Capital, LLC and has been legally changed to Atlantis Asset Management, LLC as of May, 2012.

The majority owner of Atlantis Asset Management is MDC Wealth Management LLC and the ownership and officers of the firm is outlined in the following table:

FULL LEGAL NAME	Title or Status	Date of Title	Ownership	Control	CRD No. / SS No.
MDC WEALTH MANAGEMENT, LLC	MEMBER	4/2009	100%	Y	45-4597765
MICHAEL DAVIS COHN	MANAGING MEMBER / CHIEF COMPLIANCE OFFICER	04/2009	N/A	Y	1743568

Item 4B

We provide continuous and regular account supervision to clients. Clients may request advice on all of their portfolios and investments. Each account is being held as a separate account in the investor's (client) name at a third party custodian.

As part of our portfolio management service, we generally create a portfolio, consisting of individual stocks or bonds, exchange traded funds ("ETFs"), options, mutual funds and other public and private securities or investments. The client's individual investment strategy is tailored to their specific needs and may include some or all of the previously mentioned types of securities.

Each portfolio is initially designed to meet a particular investment goal, which we determine to be suitable to the client's circumstances. Once the appropriate portfolio has been determined,

we review the portfolio at least monthly and if necessary, rebalance the portfolio based upon the client's individual needs, stated goals and objectives.

Specialized investment services

- a) Portfolios are team managed. The investment team meets weekly to discuss strategy, portfolio holdings and buy/sell candidates. Each team member is responsible for implementing investment policy in their respective client accounts and contributing to general investment policy by staying abreast of the dynamics impacting their designated sectors, industries and companies.
- b) Frequently we employ portfolio risk management techniques using derivatives. No leverage is used in the management of portfolios unless specifically requested by a client. A simple month-to-month covered call writing strategy is periodically employed in equity portfolios. Additionally, from time to time, market exposure has been reduced by purchasing puts on a broad large cap index such as the S&P 500 or the Russell 1000 indexes. At no time is the derivative strategy employed with more than 1:1 leverage unless specifically requested by the client. The strategy is employed to reduce the volatility (standard deviation) of returns.

Item 4C

All clients may choose whether to participate in the team managed portfolios and (or) the risk management strategy.

Each client has the opportunity to place reasonable restrictions on the types of investments to be held in the portfolio.

Item 4D

Participation in wrap fee programs.

We do not offer wrap fee programs.

Item 4E

Disclosure of the amount of *client* assets we manage on a *discretionary basis* as of December 31, 2023

We manage **sixteen million two hundred thousand (\$16,200,000)** on a *discretionary basis*.

Disclosure of the amount of *client* assets we manage on a non-*discretionary basis* as of December 31, 2023

We manage **no assets (\$0.00)** on a non-*discretionary basis*.

Our Total Assets under Management (AUM) are **sixteen million two hundred thousand (\$16,200,000)**.

Fees and Compensation

Item 5A

Fees for Atlantis Asset Management's investment advisory services are billed to the client account. Client shall pay Atlantis Asset Management an annual advisory or investment management fee based on the total market value of the account and shall be computed as of the close of trading on the last business day of March, June, September, and December. The fee schedule is based on assets under management and is negotiable depending on the size of the account and the strategy employed.

\$100,000 to \$500,000	2.00% annualized
\$500,000 to \$2,000,000	1.50% annualized
\$2,000,000 to \$5,000,000	1.00% annualized
over \$5,000,000	Negotiable

The minimum account size for new households and entities is \$250,000. There is no minimum for referrals from existing clients.

Item 5B

All fees are paid in advance in 4 installments at the beginning of each quarter based on the account value at the beginning of each quarter. The investment advisory fee for the account for the following quarter will be one fourth of the annual fee and will be billed in advance and debited from the Client's account each quarter, unless otherwise agreed upon by the Client. For Clients whose accounts are externally billed for advisory fees, Atlantis Asset Management and Client mutually agree that Atlantis Asset Management shall have the right to directly debit the account for unpaid fees in excess of 30 days past due.

Item 5C

The Client pays all transaction charges at the specific rates proscribed by the custodian. These transaction charges may include markups on Fixed Income transactions, mutual fund transaction fees, ticket charges for stock trades, incoming and outgoing wire fees and ACAT fees. At this time these are the only fees charged by Atlantis Asset Management's primary third-party custodian to the client directly. Atlantis Asset Management does not benefit, in any way from these charges to the account. Atlantis Asset Management's policy is that custody of client assets is solely at the discretion of the client. The sole reason for Atlantis Asset Management choosing or recommending one custodian over another is the combination lowest price, size offered or bid, financial stability plus service. The advisory fee provided for in this agreement is based upon Client's agreement that Atlantis Asset Management may need to select outside broker-dealers for certain Fixed Income transactions (please see Item 5E), but will, as a matter of policy, seek the lowest total transaction cost (best execution policy and procedure). Atlantis Asset Management does not receive soft dollar consideration for sending trades to a certain broker-dealer or custodian.

Item 5D

As a matter of policy all fees for investment advisory services are paid in advance. Clients may, at any time, terminate advisory fee agreements in writing. A Client must notify Atlantis Asset Management by mail or by electronic communication as outlined in the fee agreement. Any fees paid in advance will be promptly refunded, and prorated from the date of notification.

Item 5E

1. Atlantis Asset Management only charges fees as a percentage of assets under management to clients. As a matter of policy, Atlantis Asset Management, nor any future supervised person(s), will receive additional compensation for securities purchased or sold from a clients account. Only one special situation, for a Fixed Income transaction, we will not only rely on the primary custodian for prices, but also check numerous other sources for better prices, in order to facilitate our “best execution” policy. If the best total price can only be transacted away from the primary custodian then we might recommend to the client, before the transaction, to execute the transaction away from the primary custodian. In that case the client must sign a disclosure statement, and will most likely pay a markup or commission to an un-related third party that is not the primary custodian. In all cases the exact price to be paid and the commission or markup will be disclosed and agreed to by the client before the transaction is initiated. We believe that this policy, while it may pose a potential conflict of interest, it is instituted to be in the best interest of the client because of the lowered price paid, or higher price received for the aforementioned Fixed Income transaction.
2. All clients will have the option to purchase any investment product recommended by Atlantis Asset Management through the custodian or broker-dealer of their choice.
3. Atlantis Asset Management does not receive more than 50% of its revenue from advisory clients as results of commissions.
4. Atlantis Asset Management nor any affiliated entity charges commissions or markups

Performance-Based Fees and Side-By-Side Management

Item 6

Atlantis Asset Management does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

Types of *Clients*

Item 7

Atlantis Asset Management Investment Management generally provides investment advice to individuals, pension and profit sharing plans, trusts, estates, charitable organizations, corporations, business entities.

We plan to have the following types of clients:

- Individuals
- Trusts, Estates or Charitable Organizations.
- Profit Sharing Plans
- Corporations or Other Business Entities
- Partnerships
- Foundations

The minimum account size for new households and entities is \$250,000. There is no minimum for referrals from existing clients.

Methods of Analysis, Investment Strategies and Risk of Loss

Item 8A

Description of the methods of analysis and investment strategies we use in formulating investment advice or managing assets.

All investing involves risk. The most basic kind of risk is the risk of loss of principal. If you buy a stock or mutual fund or invest in real estate, there is no guarantee that you will get all of your principal back. Each one of our styles of investing involves this basic risk.

Our belief is that one style or method of investing is inadequate. We have found that a combination of all four types of analysis methods can potentially outperform on a risk adjusted basis in a majority of market scenarios.

Main Investment Products:

Global All-Cap Core (Risk-Managed). This strategy will invest exclusively in Large Capitalization

companies that are determined to be best-of-breed within their respective industries. The portfolio will consist of 25-50 large publicly traded companies across the a majority of the S&P sectors. There will also be a risk-management component which will include (but not limited to) a covered-call writing strategy to mitigate risk.

Focused Dividend. This strategy will invest exclusively in Large Capitalization companies that are determined to have fully paid and raised their dividend for at least 10 years. The portfolio will consist of 25-50 large publicly traded companies. The goal is to yield at least three percent in income

Methods of Analysis:

- **Cyclical (Cycle Research)** This is the analysis of long term asset price trends.
- **Macro (Top-Down)** This analysis views global business development and demographic trends.
- **Fundamental (Bottom-Up)** This analysis dissects companies for their individual financial strength using ratio analysis.
- **Technical (Chart Analysis)** This type of analysis aims to pinpoint entry and exit points for markets, asset classes and individual stocks. Based on supply and demand.

Investment Strategies we use:

- Long-term purchase (securities held at least a year)
- Short-term purchase (securities sold within a year)
- Option writing, consisting of covered call options (No Leverage)
- Hedging Strategies including the purchase of index, etf, and single stock puts (No Leverage)

Under certain circumstances a client may request to use leverage, and we will accommodate at our discretion given an appropriate perceived risk tolerance.

Item 8B

All Asset-Classes bear risk of loss of principal. We employ many methods to mitigate investment risk. Each one strategy or method of analysis unto itself bears a risk because markets and

perceptions of markets are continually changing. Each of our investment strategies and methods of analysis are employed in concert with each other within our stated investment products in order to maintain needed investment flexibility. There is the risk that our employment of these methods will not work. Because of this all of our client's equity portions of their portfolios are invested in traditional exchange traded liquid assets. In addition all equity portfolios can be risk managed using options if the client chooses.

Fixed Income products are less liquid and are only traded dealer to dealer therefore bear more liquidity risk and scrutiny on our part. Corporate, Governments, and Municipal Securities make up all of our individual Fixed Income securities held in client portfolios.

We invest for the long term but sometimes market conditions change and we will make short term decisions. This will cause us to rebalance portfolios continually. We constantly update our assumptions for risk/reward for the major asset classes. We constantly are researching methods and techniques for reducing risk in client portfolios.

Item 8C

Equity investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry market conditions and general economic environments.

Mutual Funds: Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond (fixed income) nature or stock (equity) nature, or a mix of multiple underlying security types.

Exchange Traded Funds (ETFs): An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance. Because ETFs use "authorized participants" (APs) as agents to facilitate creations or redemptions (primary market), there is a risk that an AP decides to no longer participate for a particular ETF; however, that risk is mitigated by the fact that other APs can step in to fill the vacancy of the withdrawing AP [an ETF typically has multiple APs] and ETF transactions predominantly take place in the secondary market without need for an AP. Like other liquid securities, ETF pricing changes throughout the trading day and there can be no guarantee that an ETF is purchased at the optimal time in terms of market movements. Moreover, due to market fluctuations, ETF brokerage costs,

differing demand and characteristics of underlying securities, and other factors, the price of an ETF can be lower than the aggregate market price of its cash and component individual securities (net asset value – NAV). An ETF is subject to the same market risks as those of its underlying individual securities, and also has internal expenses that can lower investment returns.

Options are contracts to purchase a security at a given price, risking that an option may expire out of the money resulting in minimal or no value. An uncovered option is a type of options contract that is not backed by an offsetting position that would help mitigate risk. The risk for a “naked” or uncovered put is not unlimited, whereas the potential loss for an uncovered call option is limitless. Spread option positions entail buying and selling multiple options on the same underlying security, but with different strike prices or expiration dates, which helps limit the risk of other option trading strategies. Option writing also involves risks including but not limited to economic risk, market risk, sector risk, idiosyncratic risk, political/regulatory risk, inflation (purchasing power) risk and interest rate risk.

Inflation Risk, also known as Purchasing Power Risk, arises from the decline in value of securities cash flow due to inflation, which is measured in terms of purchasing power. Inflation Protection Bonds such as TIPS are the only protection offered against this risk. Floaters, the resetting of the interest rates, can help reduce inflation risk. All other bonds have fixed interest rates for the life of the bond, which exposes the investor to this risk.

Interest Rate Risk is the risk that an investment's value will change due to a change in the absolute level of interest rates, spread between two rates, shape of the yield curve, or in any other interest rate relationship. These changes can be reduced by diversifying or hedging, since the changes usually affect securities inversely.

Economic Risk is the chance that macroeconomic conditions like exchange rates, government regulation, or political stability will affect an investment, usually one in a foreign country.

Market Risk, also called systematic risk, is the possibility of an investor experiencing losses due to factors that affect the overall performance of the financial markets in which they are involved. This type of risk can be hedged against, but cannot be eliminated through diversification. Sources of market risk include recessions, political turmoil, changes in interest rates, natural disasters and terrorist attacks.

Political Risk, also known as geopolitical risk, is risk an investment's returns could suffer as a result of political changes or instability in a country. This becomes more of a factor as the time horizon of an investment gets longer. Instability affecting investment returns could stem from a change in government, legislative bodies, other foreign policy makers or military control.

Regulatory Risk is the risk that a change in laws and/or regulations will materially impact a security, business, sector or market. These changes can increase the costs of operating a business, reduce the attractiveness of an investment, or change the competitive landscape, and are made by either the government or a regulatory body.

Liquidity Risk stems from the lack of marketability of an investment that cannot be bought or sold quickly enough to prevent or minimize a loss. It is typically reflected in unusually wide bid-ask spreads or large price movements. Typically, the smaller the size of the security or its issuer, the larger the liquidity risk.

Credit Risk traditionally refers to the risk that a lender may not receive the owed principal and interest, which results in an interruption of cash flows and increased costs for collection. Credit risk is the probable risk of loss resulting from a borrower's failure to repay a loan or meet contractual obligations. While impossible to know exactly who will default on obligations, with proper assessment and credit risk management, the severity of loss can be lessened. A lender's or investor's reward for assuming credit risk include the interest payments from the borrower or issuer of a debt obligation.

Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Disciplinary Information

Item 9 A/B/C

There are no criminal or civil actions to report.

There are no administrative proceedings to report.

There are no self-regulatory organization proceedings to report.

Other Financial Industry Activities and Affiliations

Item 10A

Neither Atlantis Asset Management nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer.

Item 10B

Neither Atlantis Asset Management nor its representatives are registered as or have pending applications to become either a Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities. –

Item 10C

At this time we provide stock selection services to another investment adviser for compensation Greystone Financial (CRD# 306595) which will take as much as 6 hours per week

Item 10D

Atlantis Asset Management manages all client assets “in house” and therefore does not refer clients to other investment advisers. Atlantis will also recommend that investments be made in certain hedge funds, tangible assets, private equity, and venture capital as part of a clients total asset allocation. We receive no compensation for recommending these types of investments. We do reserve the right to include these assets as part of our total asset under management for an individual and also the firm as a whole. Atlantis also will oversee, and closely monitor assets managed by a third party manager that is previously chosen by the client. Therefore Atlantis Asset Management will provide advice to clients on assets not held at the primary third-party custodian. We do not believe that this type of business relationship poses any conflict of interest to us or to our clients.

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

Item 11A

Atlantis Asset Management, its principals, and employees adhere to the Code of Ethics and Standards of Professional Conduct which is modeled after the CFA Institute Code of Ethics Standards of Professional Conduct.

Our document is available in either printed or electronic format to all current and prospective clients at their request.

Item 11B

Atlantis Asset Management, as a matter of policy, will not purchase or recommend any security in which we, or a related person, has any material financial interest.

Item 11C/D

1. Pursuant to the Code of Ethics and other Atlantis Asset Management policies and procedures with regard to confidentiality, and avoidance of potential conflicts of interest, all transactions executed at Atlantis, including those on behalf of its principals, related persons, and employees, are reviewed daily to prevent the misuse of material non-public information and other violations of law and (or) conflicts of interest. From

time to time, principals, related persons, and employees of Atlantis Asset Management, may have positions, or may engage in transactions, in the same securities as those purchased or sold for advisory clients. All transactions for principals or employees of Atlantis Asset Management or Greystone Financial within the same day as those for clients will be executed at an average price identical or worse than that paid by or to clients. Atlantis Asset Management believes this policy, if administered diligently, does not pose any unaddressed conflict of interest.

2. Greystone Financial currently employs Atlantis' portfolio manager to help with portfolio construction, who as previously disclosed, requires on average 5-6 hours per week. For clients there is a potential for conflict of interest in that less time is spent on portfolio construction and monitoring. In order to mitigate this potential conflict all portfolios across firms are managed with the exact same strategies unless directed otherwise by the client.

Brokerage Practices

Item 12A

1. Research and Other Soft Dollar Benefits.

Atlantis Asset Management receives no payment for order flow or any Soft Dollar benefits

2. Brokerage for *Client* Referrals.

Atlantis Asset Management dispenses no brokerage for client referrals, nor does Atlantis Asset Management receive any compensation whatsoever for directing order flow. In general, these policies and procedures are intended to eliminate, to the extent possible, any adverse effect on clients of any such potential conflicts of interest.

3. Directed Brokerage.

- a) Atlantis Asset Management, as a matter of policy, will not direct brokerage to an affiliated broker dealer. For Fixed Income transactions the directed brokerage is to effect our policy and procedure of best execution as described in Item 5E and further in 10C. In this case we also are able to aggregate orders and thus transactions so that all clients participating will receive identical prices and total transaction costs.
- b) We will permit clients to direct trades of their choosing to a broker-dealer of

their choice. In that case, before the account is opened, the client must initial the clause allowing such in the Atlantis Asset Management Investment Management Agreement, that the client has executed at the opening of the account. In addition, the client must sign a Prime Brokerage agreement that states this will most likely result in a greater cost to the client for such directed transactions.

In the case of all assets held at an outside (other than primary) custodian, all clients by choosing this method, will not receive the same price as other clients trading in the same security. The price may be better or worse, and the transaction charge will also be different than other clients of Atlantis Asset Management trading in the same security. In addition, in all cases, clients at the primary custodian will be executed first then the outside custodians because the trades must be phoned in and entered manually.

Item 12B

Aggregation of Orders

Whenever possible orders for securities transacted in the same security on the same day are aggregated into a block order to achieve an average price that all participating clients receive. Every effort is made to aggregate all orders in this manner. This will be the case in all circumstances except where accounts are held at an, other than, primary third-party custodian. In this case the costs to transact trades in this manner will most likely be higher.

Review of Accounts

Item 13A

All accounts are reviewed at least quarterly, and some monthly depending on investment strategy, by a Senior Portfolio Manager. Michael Cohn is currently designated as Senior Portfolio Manager.

Item 13B

There is no specific sequence of non-periodic review. All reviews include portfolio structure, asset allocation and stock selection and consider the clients' stated investment objectives and Atlantis Asset Management's standards of risk, and diversification.

Factors that may trigger more frequent reviews include material market events or changes in a client's personal situation.

Item 13C

All clients are entitled to receive individual mailed and (or) electronic notification copies of trade confirmations for each transaction effected in their portfolios. Otherwise all clients receive a listing of all executed trades quarterly in the custodian's statement. Simple performance and valuations and detailed performance reviews can be provided on a periodic or on an "as requested" basis. Atlantis Asset Management expects to make available to clients the use of the Advent Portfolio Reporting System, which is provided through an arrangement with a third-party custodian. All information contained within these reports contains information supplied by third parties.

Clients also may request to be notified of pending portfolio changes, sector allocations and the macro considerations behind such changes.

Client Referrals and Other Compensation

Item 14A

The firm markets directly for new clients. Frequently, existing clients introduce prospects, but receive no compensation for such referrals. Atlantis Asset Management does not compensate individuals for providing services to clients.

Item 14B

The firm does not compensate non-advisory personnel (solicitors/promoters) for client referrals.

Custody

Item 15

All funds and securities are held at a Third Party Custodian. If a client requests another than periodic report from the custodian, the report will be generated manually by the custodian. Clients will, monthly, receive account statements from our third-party custodian, and, if requested, from a third party portfolio reporting system. It is imperative that clients should carefully review all such documents and statements, and compare them for accuracy.

Investment Discretion

Item 16

Discretionary Authority for Trading

Atlantis Asset Management accepts investment discretion for client assets. **All accounts are required to execute an investment management agreement granting Atlantis Asset Management the authority to act as a discretionary investment manager. All clients are also required to execute an account agreement with the third-party custodian which also grants the right to act as a discretionary investment manager.** Atlantis Asset Management will accept reasonable limitations on its authority through client guideline restrictions, provided that the restrictions are essentially consistent with the Atlantis Asset Management investment process.

Voting Client Securities

Item 17A/B

Our current policy is to not vote client securities. We direct the custodian to deliver all proxies directly to the client. It is at the client's discretion whether to vote their securities. The client will receive proxy voting materials directly from the custodian. The client may, at any time, request that Atlantis Asset Management give advice as to a particular voting course of action.

Financial Information

Item 18A

Atlantis Asset Management neither requires nor solicits prepayment of more than \$500 in fees per client, six months or more in advance and therefore does not need to include a balance sheet with this brochure.

Item 18B

Neither Atlantis Asset Management nor its management has any financial condition that is likely to reasonably impair Atlantis Asset Management's ability to meet contractual commitments to clients.

Item 18C

If we have been the subject of a bankruptcy petition at any time during the past ten years, we must disclose this fact, the date the petition was first brought, and the current status.

Atlantis Asset Management has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.

Requirements for State-Registered Advisers

Item 19A

EDUCATION AND BUSINESS STANDARDS: All advisors employed by Atlantis must have over 5 years of professional equity and (or) fixed income investing and (or) customer service experience.

Item 19B

Michael D. Cohn –

Born: October 28, 1962

Education: Boston University School of Management, Finance 1981-1985

Business Affiliations:

Active:	Atlantis Asset Management LLC – Managing Member, Chief Investment Officer	05/2009 – date
	Greystone Financial Group – Senior Portfolio Advisor	07/2020 - date
Prior:	Global Arena Investment Management - Managing Member/Chief Investment Officer	05/2005 – 03/2012

Equities Trading Corp./Global Arena Capital Corp. - Managing Director	05/2008 – 03/2012
Clark Dodge & Company, Inc. - Director	03/2007 – 05/2008
Du Pasquier Asset Management – Vice President	07/2004 – 04/2005
Raymar Capital LLC - Managing Member	08/1997 – 05/2004

Jeffrey Brian Pereira -

Born: September 21, 1977

Education: Bryant College, Rhode Island, B.S. Finance, 2000

Business Affiliations:

Active:	Atlantis Asset Management LLC – Member	05/2012 – date
Prior:	Capital Management Group, LLC- Managing Member	09/2005 – date
	Morgan Stanley Dean Witter	09/2000 – 08/2005

Duncan G. Burke -

Born: May 2, 1943

Education: Dartmouth College, New Hampshire, B.A. Economics, 1965
Columbia University, New York, MBA, Finance, 1971

Business Affiliations:

Active:	Atlantis Asset Management LLC – Member	10/2012 – date
Prior:	Global Arena Investment Management - Managing Director/CFA	04/2009 – 10/2012
	Westminster Securities	11/2002 – 04/2009

Elias Tsoukantas -

Born: July 21, 1987

Education: Iona College, Bachelor of Arts in Business Finance 2010

Business Affiliations:

Active: **Atlantis Asset Management LLC –** 5/2012 – date
Vice President

Prior: **Global Arena Investment Management -**
Investment Associate 05/2009 – 03/2012

Item 19C

Atlantis Asset Management is not compensated for advisory services with *performance-based fees*.

Item 19D 1&2

No management person at Atlantis Asset Management or Atlantis Asset Management has been found liable in an arbitration claim or been found liable in a civil, self-regulatory organization, or administrative proceeding that is material to the client's evaluation of the firm or its management.

Item 19E

Neither Atlantis Asset Management, nor its management persons, has any relationship or arrangement with issuers of securities.