



# WFP

Wrap Fee Program  
Brochure

## Form ADV Part 2A Appendix 1: Wrap Fee Program Brochure

### Item 1 - Cover Page

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This wrap fee program brochure provides information about the qualifications and business practices of Fortis Capital Advisors, LLC ("Fortis" or "Firm"). If you have any questions about the contents of this brochure, please contact us at [compliance@fortiscapitaladvisors.com](mailto:compliance@fortiscapitaladvisors.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Registration with the SEC does not imply a certain level of skill or training.

Additional information about Fortis is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Fortis' CRD number is: 309709.

Brochure Date: October 24, 2024

## Item 2 - Material Changes

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

**Below is a summary of material changes in this Brochure since the last filing date of March 31, 2023:**

### **Item 1 - Cover Page**

The Firm's main address has changed from Reno, NV to Prairie Village, KS.

### **Item 4, Section A - What services do you offer?**

Removed reference to Fortis' assets under management value, which is not required in this brochure but is found in the Form ADV, Part 2A. Additionally removed some redundant sections that are covered elsewhere in this Brochure.

### **Item 4, Section C - Are there any additional fees I must pay?**

The Firm added a clear list of the types of fees that are not included in the wrap fee. We also removed contradictory language regarding changes made to the investments inside a client's account increasing the cost that the client would pay.

### **Item 4, Section D - Do you receive additional compensation?**

Changed response to this question from "yes" to "no". Neither Fortis nor your Advisor receive any additional compensation for offering accounts in a wrap program.

### **Item 6, Section A - How do you select and review portfolio managers?**

Removed language regarding fees paid, which are addressed in Item 4. Also removed a bulk of this section, as the same topics are addressed in the newly-added ADV Inclusions Item 4.B, 4.C, and 4.D to follow.

### **Item 6, ADV Item 4.B - What services do you offer?**

Added this section

### **Item 6, ADV Item 4.C - Do you customize your services?**

Added this section

### **Item 6, ADV Item 4.D - Do you have a program that wraps brokerage and advisory fees into one fee?**

Added this section.

### **Item 6, ADV Item 8, Section A (2) - Actively Managed Strategies**

Added language to better define how these strategies are deployed.

**Item 6 (C) - Conflicts of Interest**

Removed this section since it's not required and conflicts of interest are explained throughout this Brochure.

**Item 9, ADV Item 10, Section C (f) - Accountant or accounting firm**

Further disclosure added to clarify how Fortis will address this conflict of interest.

**Item 9, ADV Item 10, Section C (h) - Insurance Companies**

Momentum I, LLC, owned by Robert Hagg, was added to the list of insurance companies owned by related persons of Fortis.

**Item 9, ADV Item 10, Section C (m) - Other names**

Updated list of Doing Business As (DBA) names of Advisors' entities providing services on behalf of the firm.

**Item 9, ADV Item 10, Section E - Registered representatives of a Broker-Dealer**

Some Fortis Advisors have become dual-registered with unaffiliated broker-dealers, so disclosure language was added and the response was changed to the affirmative.

**Item 9, ADV Item 11, Section A - Can you briefly describe your code of ethics?**

Rewrite of the answer to better describe Fortis' expectation of its Advisors and Employees.

**Item 9, ADV Item 11, Section B - Do you or a related person recommend to clients, or buy or sell for client accounts, securities in which you or a related person has a material financial interest?**

Added reference to Fortis Advisors who have financial interest in and provide advice to mutual funds through an unaffiliated RIA, Timber Point Capital Management.

**Item 9, ADV Item 12 - Brokerage Practices**

Removed entire section, as not required.

**Item 9, ADV Item 14, Section A (b) - Other Compensation Fortis or its related persons receive from funds**

Added reference to Fortis Advisors who have financial interest in and provide advice to mutual funds through an unaffiliated RIA, Timber Point Capital Management.

**Item 9, ADV Item 14, Section B - Do you compensate anyone who is outside your firm's supervision for client referrals?**

Revision of this disclosure to better reflect the phrasing and requirements for promoters per the current marketing rules.

## Item 3 - Table of Contents

[Form ADV Part 2A Appendix 1: Wrap Fee Program Brochure](#)

[Item 1 - Cover Page](#)

[Item 2 - Material Changes](#)

[Item 3 - Table of Contents](#)

[Item 4 - Services, Fees, and Compensation](#)

[Item 5 - Account Requirements and Types of Clients](#)

[Item 6 - Portfolio Manager Selection and Evaluation](#)

[Item 7 - Client Information Provided to Portfolio Managers](#)

[Item 8 - Client Contact with Portfolio Managers](#)

[Item 9 - Additional Information](#)

## Item 4 - Services, Fees, and Compensation

A	<p><b>What services do you offer?</b></p>	<p>Fortis is a registered investment adviser who offers investment advisory services throughout the United States. Fortis was formed in 2020 as a Delaware limited liability company and is owned by Robert M. Hagg, Donatella Malitsky, and Roman Moldavsky. We also offer other investment advisory services not discussed in this Brochure. You may request a copy of Fortis' Form ADV Part 2A if you wish to learn more information about other advisory services offered by Fortis.</p> <p>Fortis participates in and sponsors a wrap fee program for certain investment advisory clients. This wrap fee program allows Fortis to manage client accounts for a single fee that includes portfolio management service and brokerage costs.</p> <p>Portfolio Management Services includes giving advice regarding asset allocation and the selection of investments. Clients are required to complete an investment profile statement or other risk tolerance/suitability questionnaire(s) and all investments are made based on the client's financial situation and profile information. Portfolio Management Services will be provided on a discretionary basis, wherein the client gives Fortis full authority to both select the appropriate investment strategy and the discretion to select sub-adviser(s) for the client's account. 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.</p> <p>The annual wrap fee for the Portfolio Management Services is charged as a percentage of assets under management and will not exceed 2.50% of the value of the portfolio. Details of the investment advisory fee charged are more fully described in the advisory agreement entered into with each client. These fees are negotiable solely at Fortis' discretion and the final fee is detailed in the Investment Advisory Agreement. Clients will be billed in advance at the beginning of each calendar quarter, based upon the value (market value or fair market value in the absence of market value), of the client's portfolio at the end of the previous quarter. The initial fee for the first calendar month in which a client participates in the Program shall be calculated on-pro-rata basis beginning the day initial assets are deposited in the Program, and is debited the following month along with the fees for the next calendar month. Fees are subsequently calculated at the beginning of each calendar month, based on the fair market value of your Account on the last business day of the prior calendar month.</p> <p>A client has the right to terminate the portfolio management agreement without penalty within five (5) business days after entering into such agreement. In addition, the investment management agreement may be canceled at any time, by either party, for any reason upon ten business (10) days' prior written notice. If an account is terminated during a calendar quarter, fees will be adjusted pro rata based upon the</p>
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	<p>number of calendar days in the calendar quarter that the advisory agreement was effective. Fortis will send a check to the client for any investment advisory fees refunded at the end of the quarter in which the account was terminated. When requested, Fortis may attempt to credit a client's account any refund owed.</p> <p>Client information that is collected by Fortis includes: personal identification information, risk tolerance, sophistication level, and income level.</p> <p>Types of Investment - Investment advice may be offered on any investments held by a client at the start of the advisory relationship. Recommendations for new investments will typically be limited to domestic and foreign equity securities, warrants, corporate debt securities, commercial paper, certificates of deposit, municipal and United States government securities, mutual funds, variable annuities, options, futures and various limited partnerships investing in real estate and oil and gas.</p> <p>Client Tailored Services and Client Imposed Restrictions - This Program will accommodate and adjust for various account sizes, account type, risk tolerance and objectives. Clients may request their investment in the program be tailored to their specific situation and we will seek to accommodate those requests. There is no guarantee that we will be able to accommodate all requests. Generally, clients are permitted to impose reasonable restrictions on investing in certain securities or types of securities in their advisory accounts, provided, however, that some restrictions may not be accommodated when utilizing Exchange Traded Funds, mutual funds or with respect to certain third-party products or services made available through Fortis. In addition, a restriction request may not be honored if it is fundamentally inconsistent with Fortis' investment philosophy, runs counter to the client's stated investment objectives, or would prevent Fortis from properly servicing client accounts.</p> <p>Fortis will periodically review with clients their financial circumstances, investment objectives and risk profile. In order for Fortis to provide effective advisory services, it is critical that clients provide accurate and complete information to Fortis and inform Fortis anytime such information needs to be updated or anytime there is a change in their financial circumstances, investment objectives and/or risk profile.</p> <p>Class Action Settlements - Although Fortis has discretion over client accounts, it will not be responsible for handling client claims in class action lawsuits or similar settlements involving securities owned by the client. Clients will receive the paperwork for such claims directly from their account custodians. Each client should verify with their custodian or other account administrator whether such claims are being made on the client's behalf by the custodian or if the client is expected to file such claims directly.</p>
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<p><b>B.</b></p>	<p><b>What contributes to the costs of this program?</b></p>	<p>The fee that you pay in WFP described in this Brochure covers investment advice you receive from your investment advisor representative (“Advisor”), portfolio management services, and trading and execution costs. However, the costs of this program may be higher or lower than if you were to purchase such services separately. There are several factors that bear upon the relative cost of the program. Factors that influence the cost of this program are use of solicitor’s fees, Advisor’s fee, investment management fees, size of account, brokerage fees and investment product fees.</p> <p>Clients pay a fee based upon the value of the household assets under the firm’s management. For a typical balanced equity and fixed income portfolio, Fortis charges an annual fee based on the below fee schedule, which is paid quarterly, in advance at the beginning of each quarter, using the value as of the last day of the prior quarter to calculate the fee. For example, if your annual fee is 1.00%, each quarter we will multiply the value of your account on the last day of the prior quarter by 1.00%, then multiply by the number of days in that quarter and divide by 365 to calculate our fee. If assets in excess of \$500,000 are deposited into or withdrawn from an account after the inception of a billing period, the fee payable with respect to such assets is prorated based on the number of days remaining in the billing period. Any adjustments in fees related to the withdrawal of assets in an account will be credited against the next billing period’s investment advisory fees. Additionally, to the extent there is cash in your account, it will be included in the value for the purpose of calculating fees only if the cash is part of an investment strategy. This annual fee applies to all of Fortis’ wrap fee clients. Fortis may agree to charge a lesser fee in its sole discretion. Fees are negotiable, based on the nature of the account.</p>
<p><b>C.</b></p>	<p><b>Are there any additional fees I must pay?</b></p>	<p>Yes, there are additional fees you should be aware of. The fees not included in the wrap program are as follows:</p> <ul style="list-style-type: none"> <li>• transaction fees deducted by the custodian(s) of held away assets,</li> <li>• fees and expenses of exchange traded funds (ETFs) and open or closed end mutual funds, which are deducted prior to the calculation of the net asset value of the applicable fund,</li> <li>• markups and markdowns, bid-ask spreads, selling concessions and other fees in connection with principal transactions,</li> <li>• Non-publicly traded securities custody fees</li> <li>• Account activity and miscellaneous fees (margin interest, electronic funds and wire transfer fees and other account activity fees, transfer taxes, odd-lot differentials, certificate delivery fees, reorganization fees, fees required by law, and any other similar costs or charges)</li> </ul> <p>For certain clients participating in WFP, Fortis may, in its discretion, absorb the following types of transaction costs as part of its advisory fees: expenses related to the use of margin, wire transfer fees, fees charged by regulatory agencies, and any transaction fees for securities trades executed by a broker-dealer other than the</p>

		<p>client's custodian.</p> <p>There is no difference between how Fortis manages wrap fee accounts and how Fortis manages other accounts and no difference in the fees clients will pay. Regardless of whether the client participates in the wrap fee program, the client will receive statements from the account custodian showing the transactions in the account and the associated costs of those transactions. Wrap fee clients will execute a separate agreement acknowledging that Fortis is paying the transaction fees stated above.</p> <p>Because of the nature of a wrap fee program, the wrap fee program client may pay more or less than if the client had compensated Fortis outside of the wrap fee program. For example, if a client's account is rarely traded, the transaction fees the client would have paid would be minimal, thus limiting the benefits of "wrapping" management fees and transaction fees.</p>
<b>D</b>	<b>Do you receive additional compensation?</b>	<p>No. Fortis receives the same compensation for the participation of clients in the wrap fee program as for non-wrap clients. Fortis is compensated 0.15% as a platform fee, which is charged universally to all clients. If a Fortis model portfolio is used within this Program, Fortis is compensated with an additional 0.30% for managing the portfolio internally. Compensation received may be more than what would have been received if the client paid separately for investment advice, brokerage, and other services, depending on the volume of trading in the account. Therefore, Fortis has a financial incentive to recommend the wrap fee program to clients.</p> <p>Transaction fees are paid to broker-dealers, mutual funds and ETFs and stock market exchanges. The remainder of the wrap fee is the management fee payable to your Advisor for acting as portfolio manager. Net fees received by Fortis after paying transaction and other costs vary depending upon the level of trading in a client's account. The more transactions in the account, the greater the amount of transaction fees, and therefore the less compensation to Fortis. Accordingly, Fortis may have a financial incentive to minimize trading activity in the account. This creates a conflict of interest between the Advisor and its wrap clients. Fortis attempts to mitigate this conflict by requiring its employees to acknowledge their fiduciary duty to place client interests ahead of their own and by periodically comparing wrap program client performance against clients who are not in the wrap program. Further Fortis and its principals believe that the Company has an incentive to protect client assets and guard the best interests of its clients. Recommending the appropriate risk adjusted investments that match each client's specific investment objectives is the most important way Fortis can ensure its continued success. Fortis maintains a long-term view in growing its business. Fortis greatly values developing long-term relationships with its clients and does not consider short term benefits from savings trading costs. Fortis believes that it is important to offer its clients a clear and transparent view of the total cost of advisory services it provides to them.</p>



		Fortis will receive no additional compensation for offering the wrap fee program.
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## Item 5 - Account Requirements and Types of Clients

Fortis provides WFP to individuals (including high net worth individuals), pension and profit sharing plans, trusts, estates, charitable organizations, Section 401(k) retirement plans, corporations and other types of business entities.

Fortis provides investment management services for a fee calculated as a percentage of the market value of the assets under management subject to a minimum annual fee of \$10,000, but may be waived or reduced at the discretion of Fortis. Clients with smaller account balances who are charged the minimum annual fee may pay a significantly higher fee percentage than larger-balanced accounts. Clients are advised that they may pay a higher or lower fee if they were to engage another adviser. Prior to engaging Fortis to provide investment management services, the client is required to enter into an investment advisory agreement.

In general, Fortis requires a minimum household relationship size of \$750,000. However in its sole discretion, Fortis may waive such minimum size requirements

## Item 6 - Portfolio Manager Selection and Evaluation

<b>A</b>	<b>How do you select and review portfolio managers?</b>	The wrap fee program offered by Fortis is sponsored by the firm, and Fortis is the only portfolio manager. All client accounts managed by Fortis, including wrap fee program clients, are managed with similar processes, although account recommendations may differ.
<b>B.</b>	<b>Do any of your related persons act as a manager for this program?</b>	No.
<b>C.</b>	<b>Do any of your supervised persons act as portfolio managers for this program?</b>	Yes. Various Advisors of Fortis may offer WFP to their client base, assuming that the clients meet the minimum standards indicated above.

ADV Part 2 Inclusions - Item 4 Advisory Business		
	<p><b>Item 4.B</b> <b>What services do you offer</b></p>	<p>Portfolio Management Services. Fortis provides ongoing portfolio management services to individuals, families, businesses and other investment advisers. When providing portfolio management services, the Firm not only makes recommendations related to investments, but also implements these recommendations and provides ongoing monitoring and management of each account. Each portfolio is tailored to the individual needs of a particular client (whether an individual, a family or a business) through an assessment conducted prior to an engagement. Clients may impose restrictions related to the level of discretion granted, the types of investments used, etc. Clients that decide to engage Fortis on a non-discretionary investment basis must be willing to accept that Fortis cannot affect any account transactions without obtaining prior consent to any such transaction(s) from the client. Thus, in the event of a market correction during which the client is unavailable, Fortis will be unable to effect any account transactions (as it would for its discretionary clients) without first obtaining the client's consent. Terms of an actual engagement, including description of service, limitations and restrictions, fees, etc., are all detailed before any engagement begins in a written client agreement.</p> <p>Financial Planning and Consulting Services. Fortis provides financial planning and/or consulting services (including investment and non-investment related matters, including estate planning, insurance planning, etc.) on a fixed fee or hourly fee basis. Prior to engaging Fortis to provide planning or consulting services, clients are required to enter into a Financial Planning and Consulting Agreement with Fortis setting forth the terms and conditions of the engagement (including termination), describing the scope of the services to be provided, and the portion of the fee that is due from the client prior to Fortis commencing services. The client always retains absolute discretion over all such implementation decisions and always has the right whether to accept or reject any recommendation from Fortis. Please Note: It remains the client's responsibility to promptly notify Fortis if there is ever any change in their financial situation or investment objectives for the purpose of reviewing, evaluating or revising Fortis' previous recommendations and/or services.</p> <p>As indicated above, Fortis may provide financial planning and related consulting services regarding non-investment related matters, such as estate planning, tax planning, insurance, etc. Neither Fortis nor its representatives serve as an attorney or accountant, and no portion of its services should be construed as legal or accounting advice. Accordingly, Fortis does not prepare estate planning documents or tax returns. To the extent requested by a client, Fortis may recommend the services of legal or tax professionals. Clients are reminded that they always have the right to decide whether to engage the services of any such recommended professional.</p>

		<p>Implementation of Financial Planning Recommendations. The client retains absolute discretion over all such implementation decisions and always has the right whether to accept or reject any recommendation made by Fortis or its representatives or any affiliated entities. Clients may be offered insurance products through Fortis' affiliate Fortis Brokerage Services, Inc., a New York licensed insurance agency. In the event clients purchase any offered insurance products, commissions will be paid to the above insurance agencies and the licensed representative, which is a conflict of interest. Fortis will exercise its fiduciary duty in regard to any sale of such insurance products and clients are reminded that they always have the right to decide whether to act on any such recommendations and to purchase any insurance products from anyone they so choose. Such recommendations will only be made in the clients best interest.</p> <p>Tax Planning and Preparation. Clients may be offered tax planning and preparation services through Fortis' affiliated entity, Tutum Strategies, LLC, or through an entity associated with an Advisor. In the event that the Client engages any of these entities for their services, the advisor and/or Fortis will benefit from that engagement, which causes a conflict of interest. The Client retains absolute discretion over all such engagement and always has the right to accept or reject any recommendation made by Fortis or its representatives or any affiliated entities. In addition, these services may or may not be bundled along with the asset management pricing or financial plan pricing. Please discuss with your Advisor regarding services provided.</p> <p>Client Obligations. In performing its services, Fortis shall not be required to verify any information received from the client or from the client's other professionals, and is expressly authorized to rely thereon. Moreover, each client is advised that it remains their responsibility to promptly notify Fortis if there is ever any change in their financial situation or investment objectives for the purpose of reviewing, evaluating or revising Fortis' previous recommendations and/or services.</p> <p>Fortis shall provide investment services specific to the needs of each client. Prior to providing investment services, an investment adviser representative will ascertain each client's investment objective(s). Thereafter, Fortis shall allocate and/or recommend that the client allocate investment assets consistent with the designated investment objective(s). The client may, at any time, impose reasonable restrictions, in writing, on Fortis' services.</p> <p>Educational Workshops. Fortis provides educational workshops for those desiring information on personal finance and investing. Topics may include issues related to general financial planning, educational funding, estate planning, retirement strategies, insurance planning and various other current economic or investment topics.</p>
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	<p><b>Item 4.C</b>  <b>Do you customize your services?</b></p>	<p>Yes. We believe in providing customized investment advice to clients, and each Fortis' investment advisor representative ("Advisor") retains the authority to implement his or her own investment and financial planning styles. Prior to making an investment recommendation or implementing an investment strategy, we work with you to understand your financial needs and risk tolerance.</p> <p>For certain clients, Fortis uses model portfolios together with a specific set of recommendations for each client based on their personal restrictions, needs, and targets. If we use these model portfolios, the client will not be able to impose restrictions on investing in certain securities or types of securities in accordance with their values or beliefs unless the model portfolios are designed to accommodate such values or beliefs. You will be responsible for notifying us of any updates regarding your financial situation, investment objectives, or risk tolerance and whether you wish to impose or modify any existing investment restrictions.</p>
	<p><b>Item 4.D</b>  <b>Do you have a program that wraps brokerage and advisory fees into one fee?</b></p>	<p>Yes. A wrap fee program is an investment program in which the client pays one stated fee that includes management fees, transaction costs, and other administrative fees. Clients should refer to the sponsor's Wrap Fee Program Brochure and consult with their Advisor for any additional information or questions they may have with respect to the specific wrap fee program. Wrap fee programs may cost a client more or less than purchasing such services separately through one or more non-wrap account(s), depending on the volume of trading and the size of a client's account(s). In general, a wrap fee program can be comparatively less expensive for actively traded accounts; conversely, non-wrap fee programs can be comparatively less expensive for accounts in which there is minimal trading activity.</p> <p>Fortis sponsors one wrap fee program: the Portfolio Manager's Wrap Fee Program ("PMW"). To learn more about our wrap fee programs you may request a copy of the PMW Wrap Fee Program Brochure. If you receive services through a wrap fee program, you will only pay fees based on assets under management and you will not pay a separate commission, ticket charge, or custodian fee, for the execution of transactions in your account(s). Fortis and certain service providers, including (if applicable) the platform provider, the custodian, and portfolio manager, will receive a portion of the fee as compensation for services.</p>
	<p><b>ADV Part 2 Inclusions - Item 6</b>  <b>Performance Based Fees and Side-by-side Management</b></p>	

	<b>Do you charge clients performance based fees or engage in side-by-side management?</b>	Fortis does not charge you an additional fee based on the performance of your accounts (performance-based fees) or engage in side-by-side management. Performance-based fees are fees that are based on a share of capital gains or capital appreciation of a client's account. Side-by-side management refers to the practice of managing accounts that are charged performance-based fees while at the same time managing accounts that are not charged performance-based fees. Fortis' fees are calculated as described above and are not charged on the basis of a share of the capital gains upon, or capital appreciation of, the funds in a client's account.
	<b>ADV Part 2 Inclusions - Item 8 Methods of Analysis, Investment Strategies, and Risk of Loss</b>	
	<b>Item 8.A Methods of Analysis and Investment Strategies</b>	<p>The investment advice you receive is based on the experience and investment style of your Advisor. Therefore, it is important to ask your Advisor about their experience, services, investment style and review the <u>Form ADV Part 2B - Brochure Supplement</u> which provides additional background information about your Advisor.</p> <p>An analysis of your current financial situation, risk tolerance, and future needs will be used to help determine the best investment vehicles to meet your investment objectives. The replacement of an investment vehicle may be triggered by performance, a change in management, market outlook or a client's personal financial situation.</p> <p>Your Advisor may create his or her own unique portfolios for clients and there are no "standard" portfolios. We customize portfolios in this way to meet a client's individual needs. It will be difficult for you to evaluate the past performance of a portfolio being recommended because your portfolio is likely to be different from that of another client's portfolio.</p> <p>There are model portfolios available for some of our strategies and prospective and existing clients may review these to help them understand a strategy.</p> <p>Portfolio strategies are typically combined and blended in an effort to meet the client's investment objectives. Strategies will also be changed in an effort to improve them. Below is a description of some of the investment strategies we commonly use to manage client portfolios.</p> <p><b><i>Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.</i></b></p>
1.	<b>Passively Managed Strategies</b>	Our passively managed portfolios give investors a diversified portfolio targeted to goals, like their estimated date of retirement. Use of index funds or passively managed asset class funds reduces the risks associated with actively managed and tactically portfolios. Passively managed strategies seek to track the returns of various asset classes or indexes available within the publicly traded markets. The

		<p>goal is to match the return of the targeted asset class or index instead of trying to outperform it or reduce the risk present in that given asset class or index. We attempt to meet client investment objectives and manage risks through asset allocation.</p> <p>Risk may be managed by the asset allocation and security selection of the portfolio. Please see material risks for more information.</p>
2.	<b>Actively Managed Strategies</b>	<p>Active management seeks to exploit market inefficiencies by purchasing securities (stocks, bonds or other investments) that are undervalued or by short selling securities that are overvalued. Most of the actively managed portfolios at Fortis do not use shorting.</p> <p>Active portfolio managers may use a variety of factors and strategies to construct their portfolio(s). These include quantitative measures such as price–earnings ratios and price/earnings-to-growth (PEG) ratios, sector investments that attempt to anticipate long-term macroeconomic trends (such as a focus on energy or housing stocks), technical analysis such as price movement, and purchasing stocks of companies that are temporarily out-of-favor or selling at a discount to their intrinsic value. Some actively managed funds also pursue strategies such as risk arbitrage, short positions, option writing, and asset allocation. Generally, multiple securities and/or investments are used to diversify a portfolio. The goal is to improve the probability of a positive return.</p> <p>When used, options strategies typically include buying puts to hedge equity risk, writing covered calls for income generation, and buying calls as an equity substitute. Option strategies can significantly increase risk and this may result in substantial losses. If you select to have options be a part of your portfolio, you should consult your Advisor for clarification on whether they are being used to increase or decrease risk in your portfolio.</p> <p>Actively managed strategies vary greatly from one another so it is important to discuss and understand the investment methodology being used. Risks may be managed through asset allocation, security selection and in some strategies, trading of securities. Actively managed strategies can be deployed in the form of a separately managed account or a single investment product (examples include: mutual fund, ETF, non-traded fund, and private funds). Please see material risks for more information.</p>
3.	<b>Tactically Managed Strategies</b>	<p>Tactically Managed Strategies seek to take advantage of short term and/ or longer term market trends. Tactical investing involves taking long or short-term positions in a range of securities. The manager then tactically trades and allocates to these securities in an effort to manage risk and produce a positive return. Technical, quantitative and to a lesser degree fundamental analysis is often an important consideration in tactical strategies as it can be helpful in determining optimal entry and exit points.</p>

		<p>Tactically Managed Strategies are generally more complex and involve different risks than standard buy-and-hold investment strategies. Unlike Passively Managed Strategies and many Actively Managed Strategies, the performance of the portfolio is primarily driven by the Trading of Securities in the portfolio or strategy and not the long term holding of assets or securities.</p> <p>Tactically Managed Strategies vary greatly from one another so it is important to discuss and understand the investment methodology being used. Risks may be managed through Asset Allocation, Security Selection and Trading of Securities. Please see material risks for more information.</p>
4.	<b>Blended Strategies</b>	<p>Blended Strategies involve blending of Passively Managed Strategies, Actively Managed Strategies and Tactically Managed Strategies in the construction of your portfolio. Please see the above descriptions of Passively Managed, Actively Managed and Tactically Managed Strategies to understand more about these portfolios.</p> <p>Blended strategies vary greatly from one another so it is important to discuss and understand the investment methodologies being used. Risks may be managed through Asset Allocation, Security Selection and Trading of Securities. Please see material risks for more information.</p>
5.	<b>ESG Strategies</b>	<p>ESG investing is the practice of incorporating environmental, social and/or governance (ESG) considerations into the portfolio construction and monitoring process. ESG is a term that is often used synonymously with sustainable investing, socially responsible investing, mission-related investing, or impact investing and screening. “Environment” focuses on themes including but not limited to climate impact and greenhouse gas emissions, energy efficiency, air and water pollution, water scarcity, biodiversity, sustainability practices, and site restoration issues. “Social” focuses on themes including but not limited to human rights, local community impact and employment, child labor, working conditions, health and safety, and anti-corruption issues. “Governance” focuses on themes including but not limited to the alignment of stakeholders’ interests, executive compensation, board independence and composition, and other shareholder rights issues. There are multiple approaches to ESG investing that may involve the exclusion, integration, and/or engagement of particular companies, countries, municipalities, factors, trends or other investment opportunities meeting certain criteria.</p> <p>Fortis integrates ESG factors, including ESG risks and opportunities, into its investment process. Fortis believes environmental, social and governance factors inherently impact a company’s brand equity, employee satisfaction, competitive position, financial performance and ultimately long-term shareholder value. Fortis employs an ESG scoring system to compare ESG related risks and opportunities across our Qualified List. Fortis supplements its primary bottom-up research with input from a third party ESG research and ratings services to help ensure it has</p>

		<p>identified the most salient ESG factors and analyzed them.</p> <p>Clients utilizing responsible investing strategies and environment, social responsibility and corporate governance (ESG) factors may underperform strategies which do not utilize responsible investing and ESG considerations. Responsible investing and ESG strategies may operate by either excluding the investments of certain issuers or by selecting investments based on their compliance with factors such as ESG. These strategies may exclude certain sectors or industries from a client's portfolio, potentially negatively affecting the client's investment performance. A client's strategy may forgo some market opportunities available to portfolios that do not use an ESG criteria. Stocks of companies with ESG practices may shift into and out of favor with stock market investors depending on market and economic conditions. The client's or strategy's performance may at times be better or worse than performance of accounts or strategies that do not use an ESG criteria.</p>
	<b>ADV Part 2 Inclusions - Item 17</b> <b>Voting Client Securities</b>	
	<b>How do you handle the voting of proxies?</b>	<p>Fortis does not vote on client proxies. Clients maintain exclusive responsibility for: (1) directing the manner in which 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.</p> <p>Clients will receive their proxies or other solicitations directly from their custodian. Clients may contact Fortis to discuss any questions they may have with a particular solicitation.</p>

## Item 7 - Client Information Provided to Portfolio Managers

The wrap fee program offered by Fortis is sponsored by the Firm, and Fortis is the only portfolio manager. Therefore, under no circumstances will information be provided to any other portfolio managers.

## Item 8 - Client Contact with Portfolio Managers

Clients may contact their Advisor at Fortis, the only portfolio manager, at any time.



## Item 9 - Additional Information

ADV Part 2 Inclusions - Item 9		Disciplinary Information
	Has your firm or any management been subject to any legal or disciplinary actions?	No. Fortis and its management persons have no reportable legal or disciplinary history.
ADV Part 2 Inclusions - Item 10		Other Financial Industry Activities and Affiliations
A.	Are any of your management persons a registered representative of a broker-dealer?	No.
B.	Are any of your management persons registered, or have an application pending to register, as a futures commission merchant, commodity pool operator or a commodity trading advisor?	No.
C.	Does your firm or management persons have any relationship or arrangement that is material to your advisory business?	<b>Yes. Please see Item 10C 1-13 below.</b> In addition, you should be aware that certain Advisors are engaged in other business activities which are disclosed in your Advisor's <u>Form ADV Part 2B: Brochure Supplement</u> . Some activities present a conflict of interest. Your Advisor is prohibited from engaging in any practice that could jeopardize or disadvantage a client or a client account(s). Accordingly, each representative is further required to acknowledge and adhere to the policies and procedures mandated within the firm's Code of Ethics ( <b>please see Item 11 for further information regarding the Code of Ethics</b> ).
a.	Broker-Dealer	No.
b.	Investment Company	No.
c.	Another Investment Adviser	Yes. Fortis has retained Belpointe Asset Management, LLC to oversee our compliance, investment management, trading, and back office operations. Chief Compliance Officer, Belena Vincetti, is the Chief Compliance Officer of Fortis and of Belpointe Asset Management, LLC, another SEC-registered RIA firm. This may create a conflict where Fortis has an incentive to maintain its relationship with Belpointe Asset Management, LLC.

		Robert Hagg, CEO of Fortis is an owner of CreativeOne Wealth, LLC. CreativeOne Wealth, LLC is a registered investment advisor.
<b>d.</b>	<b>Futures commission merchant, commodity pool operator, or commodity trading advisor</b>	No.
<b>e.</b>	<b>Bank or Thrift</b>	No.
<b>f.</b>	<b>Accountant or accounting firm</b>	Yes. Tutum Strategies, LLC ("Tutum"). Roman Moldavsky is one of the owners of Tutum. Since Mr. Moldavsky has a financial interest in both Fortis and Tutum, there is a financial incentive for Fortis to recommend you select Tutum for your accounting and tax services. This creates a conflict of interest. Fortis addresses this conflict of interest by fully disclosing it in this Brochure, by advising clients that they are free to elect a firm other than Tutum for accounting and/or tax services, and by only recommending Tutum when believed to be appropriate for a particular client. Fortis does not receive compensation from Tutum for referring clients.
<b>g.</b>	<b>Lawyer or law firm</b>	No.
<b>h.</b>	<b>Insurance company or agency</b>	<p>Yes. Fortis Brokerage Services, Inc. is partially owned by Donatella Malitsky and Roman Moldavsky. Certain clients of Fortis will be offered fixed insurance products through Fortis Brokerage Services. Fortis and its owners receive profits and agents are compensated through payment of commissions and have a financial incentive to recommend Fortis Brokerage Services, Inc. While Fortis and our Advisors must endeavor at all times to act as fiduciaries and put the interests of the clients first, clients should be aware that this practice presents a conflict of interest because individuals providing investment advice on behalf of the firm who are also insurance agents have an incentive to recommend products to clients for the purpose of generating commissions, rather than solely based on client needs. Clients are under no obligation, contractually or otherwise, to purchase insurance products through any individual affiliated with Fortis Brokerage Services.</p> <p>Fortis Lux Insurance Agency, LLC is owned in part by Roman Moldavsky. Clients of Fortis will not be offered insurance products through Fortis Lux Insurance.</p>

		Momentum I, LLC is owned by Robert Hagg and provides both insurance products and insurance consulting services. Clients of Fortis will not be offered insurance products or consulting services through Momentum I, LLC.
i.	<b>Pension Consultant</b>	No.
j.	<b>Real Estate Broker</b>	No.
k.	<b>Sponsor or syndicator of limited partnerships</b>	No.
l.	<b>Mortgage Broker</b>	No.
m.	<b>Other names</b>	<p>Our firm offers services through our network of investment adviser representatives, which are referred to in this Brochure as Advisors. Advisors will typically have their own legal business entities whose trade names and logos are used for marketing purposes and appear on certain marketing materials or client statements. The Client should understand that the businesses are legal entities of the Advisor and not of our firm. The Advisors are under the supervision of our firm, and the advisory services of the Advisor are provided through our firm. Fortis has the arrangement described above with the following business entities or trade names that are owned and operated by Advisors::</p> <p style="text-align: center;"> Archer Wealth Planning  AWS Wealth Management  ClearPath Financial  Generations Wealth Partners  Gratus Wealth Management  Isaac Financial  Joshpe Financial  Network 1 Financial Private Wealth  Next Horizon Advisors, LLC  PFS Advisors, LLC  Rapps &amp; Associates  Serenity Wealth Management  SJ Boyle Wealth Planning, LLC  Timber Point Capital Management  Truvium Capital Partners, LLC  Turman Financial Group, LLC </p>
D.	<b>Do you recommend or select other investment advisers for your clients and do you receive</b>	Yes. From time to time Fortis will recommend other investment advisers. In certain cases, Fortis will act as a solicitor for other unaffiliated investment advisers. In those instances Fortis and its

	<b>compensation directly or indirectly from those advisers?</b>	representatives receive a portion of the fees you are charged directly from the unaffiliated adviser. This does not change the fee that you, the client, pays.
<b>E.</b>	<b>Registered representatives of a Broker-Dealer</b>	<p>Certain Advisors are also registered representatives of an unaffiliated securities broker-dealer. If your Advisor is registered with a securities broker-dealer, you can choose to work with that individual in his or her separate capacity as a registered representative of a securities broker-dealer.</p> <p>When acting in a separate capacity as a registered representative of a securities broker-dealer, your Advisor will sell, for commissions, general securities products such as stocks, bonds, mutual funds, ETFs, variable annuities and variable life products to you. As such, your Advisor will suggest that you implement investment advice by purchasing securities products through a commission-based brokerage account in addition to or in lieu of a fee-based investment-advisory account. This receipt of commissions creates an incentive to recommend those products for which your Advisor will receive a commission in his or her separate capacity as a registered representative of a securities broker-dealer. Consequently, the objectivity of their advice rendered is biased and creates a conflict of interest due to the receipt of commissions and other standard brokerage compensation. You are under no obligation to use the services of your Advisor in this separate capacity and can select any broker-dealer you wish to implement securities transactions.</p>
<b>B.</b>	<b>ADV Part 2 Inclusions - Item 11</b>	<b>Code of Ethics, Participation or Interest in Client Transactions and Personal Trading</b>
<b>a.</b>	<b>Can you briefly describe your code of ethics?</b>	<p>The Code of Ethics ("Code") adopted by Fortis is designed to comply with Rule 204A-1 under the Investment Advisers Act of 1940 ("Advisers Act").</p> <p>This Code establishes rules of conduct for all employees of Fortis and is based upon the principle that Fortis and its employees, including Advisors owe a fiduciary duty to Fortis clients to conduct their affairs, in such a manner as to avoid (i) serving their own personal interests ahead of clients, (ii) taking inappropriate advantage of their position with the Firm and (iii) any actual or potential conflicts of interest or any abuse of their position of trust and responsibility.</p> <p>Pursuant to Section 206 of the Advisers Act, both Fortis and its</p>

		employees are prohibited from engaging in fraudulent, deceptive or manipulative conduct. Compliance with this section involves more than acting with honesty and good faith alone. It means that Fortis and its employees have an affirmative duty of utmost good faith to act solely in the best interest of its clients.
	<b>Can I get a copy of your Code of Ethics?</b>	Yes, a copy of FAC's Code of Ethics is available upon request. You may make the request through your Advisor or by emailing <a href="mailto:compliance@fortiscapitaladvisors.com">compliance@fortiscapitaladvisors.com</a> .
<b>b.</b>	<b>Do you or a related person recommend to clients, or buy or sell for client accounts, securities in which you or a related person has a material financial interest?</b>	A portion of the investment product fees paid to Timber Point Global Allocation Fund (ticker: CGHIX) and Timber Point Alternative Income Fund (ticker: AIIFX), (collectively referred to as "Timber Point Funds") is paid to related portfolio managers, David Cleary and Patrick Mullin, and their firm, Timber Point Capital Management ("TPCM") for the investment advisory services provided to the fund. The Timber Point Funds have a net expense ratio of 2.56% (CGHIX) and 2.60% (AIIFX). David Cleary, Patrick Mullin, and TPCM receive 0.90% (CGHIX) and 0.80% (AIIFX) for management of the Timber Point Funds.
<b>c.</b>	<b>Do you or a related person invest in the same securities that you or a related person recommends to clients?</b>	<p>Yes. Your Advisor, the people we supervise, or our affiliates may take positions in the same securities as you. As a result, there will be times when a conflict of interest arises, and it is possible for an investment decision to benefit them more than you. To manage these conflicts we have adopted the following principles governing the personal investment activities of the people we supervise:</p> <ul style="list-style-type: none"> <li>• The client's interests will be placed first at all times.</li> <li>• All personal securities transactions will be conducted in such a manner as to avoid any actual or potential conflict of interest.</li> <li>• No access person may take inappropriate advantage of his or her positions.</li> </ul>
<b>d.</b>	<b>Do people at your firm recommend securities to clients, or buy or sell securities for client accounts, at or about the same time that he or she buys or sells the same securities for his or her own account?</b>	Yes, your Advisor is allowed to take positions in the same securities as you and as a regular course of business your positions may be bought and sold alongside your Advisor. We have imposed policy restrictions on all our personnel with respect to transactions in their own accounts and accounts over which they have control or a beneficial interest. Trading restrictions prohibit unacceptable trading practices such as front running, crossing trades with customers, and insider trading. Our Code of Ethics requires that we comply with applicable Federal

		<p>securities laws and that we report violations of the Code of Ethics. People we supervise must report their personal transactions and holdings periodically and get preclearance before buying a security in an initial public offering or private offering.</p> <p>When possible, people we supervise must trade alongside you and receive identical pricing. When this is not possible (example: trading at various custodians) the people we supervise must first buy for your accounts and then him/herself. When selling, a supervised person must sell his/her shares after a Client's shares are sold. Even though Fortis believes that this places the Client in a favorable trading position, this practice may result in Clients receiving worse pricing than access persons due to changes in the market.</p>
	<b>ADV Part 2 Inclusions - Item 13</b>	<b>Review of Accounts</b>
<b>a.</b>	<b>Do you periodically review my accounts?</b>	<p>Yes. For those clients to whom Fortis provides investment supervisory services, account reviews are conducted on an ongoing basis by Fortis' principals and/or Advisors. All investment supervisory clients are advised that it remains their responsibility to advise Fortis of any changes in their investment objectives and/or financial situation. All clients are requested to review financial planning issues (to the extent applicable), investment objectives and account performance with Fortis on an annual basis.</p>
<b>b.</b>	<b>Do you review my accounts on other than a periodic basis?</b>	<p>Review into asset allocation and security selection can be triggered by a number of factors. This may include (but is not limited to) factors such as economic conditions, market conditions, security related factors and a change in a client's financial/investment needs or goals. You may call at any time during normal business hours to speak directly with your Advisor about your account(s), financial situation, or investment needs. You may trigger a review at any time by requesting a review of your account. No formal instruction is provided on how to review client accounts. Your Advisor is permitted to use their discretion on how and when to review your account. You should consult your Advisor on the frequency and method of their reviews.</p>
<b>c.</b>	<b>What is the content and frequency of regular reports you provide me?</b>	<p>Your Advisor may provide you access to a web portal that is generally updated and reconciled on a daily basis. This site reports the holdings, balances, activity, fees and performance of your Account. At times these updates will be delayed because of technical difficulties that are common with portfolio accounting and data reconciliation.</p>

		<p>The web portal is available at <a href="http://www.fortiscapitaladvisors.com">www.fortiscapitaladvisors.com</a>. Fortis' reporting is only available electronically through this portal. Please contact your Advisor if you wish to have access to the web portal. We urge you to compare the electronic reports you receive from us with the reports you receive from your custodian to ensure accuracy.</p> <p>For retirement plan clients the type of reports and frequency is customized for each plan.</p> <p>Statements from custodians report at least quarterly describing all activity in the client's account during the preceding month/quarter, including all transactions made on behalf of the account, all contributions and withdrawals made by the client, and all fees and expenses charged to the account. It also includes the value of the account at both the beginning and end of the period.</p>
ADV Part 2 Inclusions - Item 14		Client Referrals and Other Compensation
<b>A.</b>	<b>Are you compensated by anyone other than clients for the advice that you provide to clients?</b>	Yes.
<b>a.</b>	<b>Recommendations to unaffiliated Advisors</b>	Fortis may recommend clients to certain unaffiliated investment advisers. In such instances, Fortis acts as a solicitor/promoter and receives a portion of the fee paid to the unaffiliated investment adviser. This does not raise the fee paid by the client and the client receives all required disclosure forms disclosing the terms of the solicitor/promoter relationship at the time the solicitation is made.
<b>b.</b>	<b>Other compensation Fortis or its Related Persons receive from funds</b>	A portion of the investment product fees paid to Timber Point Global Allocation Fund (ticker: CGHIX) and Timber Point Alternative Income Fund (ticker: AIIFX), (collectively referred to as "Timber Point Funds") is paid to related portfolio managers, David Cleary and Patrick Mullin, and their firm, Timber Point Capital Management ("TPCM") for the investment advisory services provided to the fund. The Timber Point Funds have a net expense ratio of 2.56% (CGHIX) and 2.60% (AIIFX). David Cleary, Patrick Mullin, and TPCM receive 0.90% (CGHIX) and 0.80% (AIIFX) for management of the Timber Point Funds.
<b>B.</b>	<b>Do you compensate anyone who is outside your firm's supervision for client referrals?</b>	Yes. In order to receive a cash referral fee from our firm, Promoters must comply with the requirements of the jurisdictions in which they operate. If you become a client, the Promoter that

		<p>referred you to Fortis will receive a percentage of the advisory fee you pay our firm for as long as you are a Fortis client, or until such time as our agreement with the Promoter expires. You will not pay additional fees because of this referral arrangement. Referral fees paid to a Promoter are contingent upon you entering into an advisory agreement with our firm. Any such referral fee is paid solely from Fortis' advisory fee, and shall not result in any additional charge to the client. Therefore, a Promoter has a financial incentive to recommend our firm to you for advisory services. This creates a conflict of interest; however, you are not obligated to retain our firm for advisory services. Comparable services and/or lower fees may be available through other firms.</p>
ADV Part 2 Inclusions - Item 18		Financial Information
a.	Will you require or solicit prepayment of more than \$1,200 in fees from me, six months or more in advance?	No. Fortis does not solicit fees of more than \$1,200 per client, six months or more in advance.
b.	Are you facing any financial condition that is reasonably likely to impair your ability to meet contractual commitments to me?	No.
c.	Have you been the subject of a bankruptcy petition at any time during the past ten years?	No.