

# DISCLOSURE BROCHURE

Part 2A of Form ADV: Firm Brochure

*Bryan Perry's Private Clients*

a division of

**MINT**

ASSET MANAGEMENT

Firm IARD/CRD #: 315568

**Mint Asset Management LLC**

REGISTERED INVESTMENT ADVISOR

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New York, NY 10006

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This Disclosure Brochure provides information about the qualifications and business practices of Mint Asset Management LLC, which should be considered before becoming a client. You are welcome to contact us if you have any questions about the contents of this brochure - our contact information is listed to the right. Additional information about Mint Asset Management LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

The information contained in this Disclosure Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any State Securities Administrator. Furthermore, the term "registered investment advisor" is not intended to imply that Mint Asset Management LLC has attained a certain level of skill or training.

BROCHURE  
DATED

**1  
OCTOBER  
2024**

## ITEM 2

**MATERIAL CHANGES**

The following is a summary of changes made to this Disclosure Brochure (Form ADV Part 2A) since the last filing dated July 30, 2024:

- ❖ Item1: Cover Page has been updated to reflect the Firm's new address.

## TABLE OF CONTENTS

ITEM 1	Cover Page	1
ITEM 2	Material Changes	2
ITEM 3	Table of Contents	3
ITEM 4	Advisory Business	4
ITEM 5	Fees & Compensation	6
ITEM 6	Performance-Based Fees & Side-By-Side Management	8
ITEM 7	Types of Clients	8
ITEM 8	Methods of Analysis, Investment Strategies & Risk of Loss	9
ITEM 9	Disciplinary Information	13
ITEM 10	Other Financial Industry Activities & Affiliations	13
ITEM 11	Code of Ethics, Participation or Interest in Client Transactions & Personal Trading	13
ITEM 12	Brokerage Practices	15
ITEM 13	Review of Accounts	16
ITEM 14	Client Referrals & Other Compensation	17
ITEM 15	Custody	18
ITEM 16	Investment Discretion	18
ITEM 17	Voting Client Securities	19
ITEM 18	Financial Information	19
	Brochure Supplements	

**ADVISORY BUSINESS****Who We Are**

Mint Asset Management LLC<sup>1</sup> (hereinafter referred to as “Mint”, “the Company”, “we”, “us” and “our”), is a Delaware Limited Liability Company, and registered investment advisor<sup>2</sup> since February 2022. The Company is committed to helping you, our client, achieve your financial goals. Mint provides investment advisory services through two divisions, each of which offers different investment management strategies. Although neither division is a separate legal entity, their investment management strategies are managed autonomously by an investment advisor representative of Mint who will serve as your primary advisor and relationship manager.

This Brochure provides information about the advisory services offered by the **Bryan Perry’s Private Clients** division of Mint. Information about Mint’s other division is provided in a separate brochure and is available upon request. While different investment management strategies are provided through each separately branded division, back-office support, such as marketing, operations, and compliance, is performed on a company-wide basis.

**Owners**

The following persons are principal owners and/or control persons of Mint Asset Management, LLC:

Name	Title	CRD#
Steven Fishman	Managing Member, Chief Compliance Officer	2428781
Jeff Greenberg Publishing, Inc.	Member	N/A
Jeffrey G. Greenberg	Chief Marketing Officer	7402940

**Mission**

We strive to help you achieve your monetary goals for today’s needs and for tomorrow’s expectations by providing comprehensive money management solutions.

**Assets Under Management**

As of June 30, 2024, Mint’s assets under management on a company-wide basis totaled:

Discretionary Accounts .....	\$43,864,045
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<sup>1</sup> Mint Asset Management LLC and its investment adviser representatives are a **fiduciaries**, as defined within the meaning of the Employer Retirement Income Security Act of 1974 (“ERISA”) and/or as defined under the Internal Revenue Code of 1986 (the “Code”) for any asset management services provided to a client who is: (i) a plan participant or beneficiary of a retirement plan subject to ERISA or as described under the Code; or, (ii) the beneficial owner of an Individual Retirement Account (“IRA”).

<sup>2</sup> The term “registered investment advisor” is not intended to imply that Mint Asset Management LLC has attained a certain level of skill or training. It is used strictly to reference the fact that we are “registered” as a licensed “investment advisor” the United States Securities & Exchange Commission (the “SEC”) - and “Notice Filed” with State Regulatory Agencies that have limited regulatory jurisdiction over our business practices.

## What We Do

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**We manage wealth.** We provide investment management solutions designed to maximize your wealth, meet your income needs, and minimize risk. We will do our best to keep you focused on where you want to go, offer advice on how to get there, and remind you of the importance of maintaining a disciplined investment approach to realize your investment goals. Our services include:

### Portfolio Management Services

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Striving to achieve the best return on your investment capital, **Bryan Perry's Private Clients** focuses its portfolio management services on designing and managing a portfolio tailored to your investment goals, risk tolerance, and income needs using a mix of investment strategies and asset classes, including but not limited to equity ("stock") positions, fixed income securities (bonds, U.S. Treasuries, and mortgage backed securities), options, investment company ("mutual fund") products, exchange traded funds ("ETFs"), Real Estate Investment Trusts ("REITs"), cash, cash equivalents, other securities and investment instruments, and third-party money managers and programs.

### Inverse & Leveraged Investments

We may utilize inverse mutual funds and/or ETFs that are designed to perform in an inverse (opposite) relationship to certain market indices (at a rate of one or more times the inverse result of the corresponding index). In addition, we may also use leveraged (enhanced) mutual funds or ETFs that provide an enhanced relationship to certain market indices (at a rate of more than one times the actual result of the corresponding index). These strategies involve a higher level of inherent risk, and therefore, you may direct us, in writing, not to employ any or all such investment strategies. See Item 8, "Methods of Analysis, Investment Strategies & Risk of Loss" for a more detailed description of the risks associated with using inverse/enhanced investments.

### Third-Party Money Managers

We may use the services of a third-party money manager or program ("TPM") to manage all or a portion of your investment portfolio. Factors that we take into consideration when selecting a TPM include, but are not limited to, the following: the TPM's performance, methods of analysis, fees, your financial needs, investment goals, risk tolerance, and investment objectives. We will monitor the TPM's performance to ensure its management and investment style remains aligned with your investment goals and objectives. The TPM will actively manage your portfolio on a discretionary basis. We will assume discretionary authority to hire and fire the TPM and/or reallocate your assets to other TPM's where we deem such action appropriate.

### Referral Services

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In situations where we determine that a TPM's investment advisory services are more suitable for your needs than ours, we will recommend that you directly engage the TPM to provide ongoing investment advisory services. You are under no obligation to accept our recommendation, but should you do so, you will be required to enter into an investment advisory agreement with the TPM. When your relationship is established with the TPM, we step away and have no further interaction with you in an advisory capacity, unless otherwise agreed to in writing. As compensation for the referral, we receive a fee from the TPM which is based on a portion (up to 20%) of your advisory fee collected by the TPM. The TPM's fee schedule and referral fees shared with us are detailed in the TPM's Disclosure Brochure (Form ADV Part 2) and other required disclosure documents that we will provide to you when we make the recommendation.

Information regarding our management fee structure is disclosed under “Portfolio Management Fee” in Item 5, “Fees & Compensation” and further description of our investment strategies under Item 8, “Methods of Analysis, Investment Strategies & Risk of Loss”.

## ITEM 5

**FEES & COMPENSATION****Portfolio Management Fee**

Portfolio Management services are primarily provided on an asset-based fee arrangement. The management fee will be calculated based on the aggregate market value of your portfolio account(s) on the last business day of the previous quarter (i.e., March 31<sup>st</sup>, June 30<sup>th</sup>, September 30<sup>th</sup>, and December 31<sup>st</sup>) multiplied by one-fourth the corresponding annual fee rate for each portion of your portfolio assets that fall within each tier.

We retain discretion to negotiate, waive, or reduce the management fee within each tier on a client-by-client basis depending on the size, complexity, and nature of the portfolio managed. In addition, as your portfolio value exceeds each tier level, either through additional deposits or asset growth, a fee break will occur. The tier breaks are as follows:

Portfolio Value	Annual Fee Rate <small>Not to Exceed</small>
Up to \$500,000 .....	1.50%
Next \$500,000 .....	1.25%
Next \$500,000 .....	1.00%
Next \$1,000,000 .....	0.75%
Next \$2,500,000 .....	0.50%
Over \$5,000,000 .....	0.35%

For any portion of your account managed by a TPM, this management fee schedule and the “Protocols for Portfolio Management” listed below may not apply.

If the TPM’s fee schedule and protocols apply, the TPM will disclose their fee schedule for management services in their Disclosure Brochure (the money manager’s ADV Part 2A: Firm Brochure), which we will provide you prior to engaging the TPM to manage your account. The money manager will bill your account for management services based on their fee schedule and split a portion of that management fee with us as agreed. Our portion of the management fee received from the TPM will generally range between 0.50% and 1.25% of the portfolio’s market value.

If our fee schedule and protocols apply, we will bill your account accordingly and share a portion of the management fee with the TPM. The TPM’s portion of the management fee will generally range between 0.25 and 1.00% of the portfolio’s market value. For example, if your account value was \$250,000 at the end of quarter, our quarterly fee would be \$937.50 (\$250,000 multiplied by 1.50% divided by four). If we engaged a TPM to manage the account based on our fee schedule at an agreed upon annual fee of 0.25% of the account value, the TPM’s share of the quarterly fee would be \$156.25 (\$250,000 multiplied by 0.25% divided by four) and our share would be \$781.25 (\$937.50 minus \$156.25).

The management fee split between the Company and TPM will not result in you paying a higher management fee. Additional Details regarding the fee split arrangement will be provided to you prior to engaging the TPM to manage your account.

The TPM's Disclosure Brochure contains all pertinent disclosures relating to their management services, the fee structure for such services, and termination provisions - you are encouraged to carefully review their document.

Please note that the fee schedules among TPMs will vary and may be higher or lower than our fee schedule. Therefore, client accounts managed by a TPM may pay a higher or lower fee than those managed solely by us.

### **Protocols for Portfolio Management**

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The following protocols establish how we handle our Portfolio Management accounts and what you should expect when it comes to: (i) managing your account; (ii) your bill for investment services; (iii) deposits and withdrawals of funds; and (iv) other fees charged to your account(s).

#### **Discretion**

We will establish discretionary trading authority on all management accounts to execute securities transactions without your prior consent or advice.

You may, at any time, impose restrictions, **in writing**, on our discretionary authority (i.e., limit the types/amounts of particular securities purchased for your account, etc.).

#### **Billing**

Your account will be billed quarterly (i.e., March 31<sup>st</sup>, June 30<sup>th</sup>, September 30<sup>th</sup>, and December 31<sup>st</sup>) in advance based on the aggregate, fair market value of your portfolio (i.e., investments/securities, cash, and cash equivalents) and where it falls within our tiered fee schedule.

For managed accounts opened between billing periods, our fee will be pro-rated from inception through the end of the quarterly billing period.

Management fees will be deducted first from any money market funds or cash balances. If such assets are insufficient to satisfy payment of such fees, a portion of the account assets will be liquidated to cover the fees.

Unless otherwise agreed to in writing, we will combine the account values of family members living in the same household to determine the applicable management fee. For example, we will combine the value of your managed account(s) with the values of managed accounts held by your spouse or partner and dependent children. Combining account values may increase the managed assets total, which could result in a reduced management fee based on the breakpoints in our tiered fee schedule.

Other than the management fees listed in Item 5 (Fees & Compensation), we do not charge you any additional fees.

#### **Deposits and Withdrawals**

Assets deposited by you into your portfolio management account between billing cycles will not result in additional management fees being billed to your account. We do not want to discourage you from investing additional capital for your future.,

We do not make partial refunds of our quarterly fee for withdrawals you make during a calendar quarter.

### Fee Exclusions

The above fees for all of our Portfolio Management services are exclusive of any charges imposed by the custodial firm who has custody of your account; including, but not limited to: (i) any Exchange/SEC fees; (ii) certain transfer taxes; (iii) service or account charges, such as, postage/handling fees, electronic fund and wire transfer fees, auction fees, debit balances, margin interest, certain odd-lot differentials and mutual fund short-term redemption fees; and (iv) brokerage and execution costs associated with securities held in your managed account. There can also be other fees charged to your account that are unaffiliated with our management services.

In addition, all fees paid to us for Portfolio Management services are separate from any fees and expenses charged on mutual fund shares by the Investment Company or by the investment advisor managing the mutual fund portfolios. These expenses generally include management fees and various fund expense, such as 12b-1 fees. Redemption fees, account fees, purchase fees, contingent deferred sales charges, and other sales load charges may occur but are the exception within managed accounts at institutional custodians. A complete explanation of these expenses charged by the mutual funds and ETFs is contained in each mutual fund's or ETF's prospectus. You are encouraged to carefully read the fund prospectus.

For more information on the custodial firm that we will recommend to custody your portfolio accounts, see Item 12, "Brokerage Practices".

### Termination of Portfolio Management Services

To terminate our Portfolio Management services, either party (you or us), by written notification to the other party, may terminate the Investment Advisory Agreement at any time. Such written notification should include the date the termination will go into effect along with any final instructions on the account (e.g., liquidate the account, finalize all transactions and/or cease all investment activity).

In the event termination does not fall on the last day of a calendar quarter, you shall be entitled to a pro-rated refund of the prepaid quarterly management fee based on the number of days remaining in the quarter after the termination notice goes into effect. If your portfolio account is managed by a TPM, your portfolio account may be billed in advance or in arrears and shall adhere to the termination policies set forth in the TPM's ADV Part 2A: Firm Brochure. Once the termination of investment advisory services has been implemented, neither party has any obligation to the other - we no longer earn management fees or give investment advice and you become responsible for making your own investment decisions.

#### ITEM 6

### PERFORMANCE-BASED FEES & SIDE-BY-SIDE MANAGEMENT

We do not charge fees based on a share of capital gains or the capital appreciation of the assets held in your accounts.

#### ITEM 7

### TYPES OF CLIENTS

We primarily offer financial services to individuals and their families. We may also advise a foundation or endowment, a charitable organization, a corporation and/or small business, a



trust, a guardianship, an estate, or any other type of entity to which we choose to give investment advice.

We generally require a minimum initial investment of \$500,000 to open a managed account; however, we retain the right to waive or reduce this minimum if we feel circumstances are warranted.

## ITEM 8

## METHODS OF ANALYSIS, INVESTMENT STRATEGIES & RISK OF LOSS

Bryan Perry's Private Clients' portfolio management services are designed to build long-term wealth while maintaining risk tolerance levels acceptable to you. We combine your financial needs and investment objectives, time horizon, and risk tolerance to yield an effective investment strategy and portfolio allocation. Your portfolio is then tailored to these unique investment parameters using a diversified mix of asset classes such as stocks, fixed income securities, options, mutual funds, ETFs, REITs, cash, cash equivalents, other securities and investment instruments, and third-party money managers.

### Methods of Analysis

In analyzing securities to develop an efficient asset allocation portfolio, we will use a combination of analysis techniques to gather information and to guide us in our management decisions.

#### Fundamental Analysis

Fundamental analysis considers: efficiency ratios, growth rates, enterprise value, economic conditions, earnings, cash flow, book value projections, industry outlook, politics (as it relates to investments), historical data, price-earnings ratios, dividends, general level of interest rates, company management, debt ratios and tax benefits.

**RISKS** - Fundamental analysis places greater value on the long-term financial structure and health of a company, which may have little to no bearing on what is actually happening in the market place. Investing in companies with sound financial data/strength and a history of healthy returns can be a good long-term investment to hold in your portfolio; however, such fundamental data does not always correlate to the trading value of the stock on the exchanges. In the short-term, the stock can decrease in value as investors trade in other market sectors.

#### Technical Analysis

Technical analysis utilizes current and historical pricing information to help us identify trends in the broader domestic and foreign equity and fixed income markets, and in the underlying assets themselves. This may involve the use of various technical indicators, such as moving averages and trend-lines, among others.

**RISKS** - Technical analysis is charting the historical market data of a stock, taking into consideration current market conditions, to forecast the direction of a future stock price rather than using fundamental tools for evaluating a company's financial strength. Technical analysis focuses on the price movement of a security trading in the marketplace. This is an ideal tool for short-term investing to identify ideal market entry/exit points. However, no market indicator is absolutely reliable, and your investment portfolio can underperform in the short-term should the market indicators be incorrect.

**Fundamental analysis** provides us with a broad long-term view of a security that begins with determining a company's value and the strength of its financials while **technical analysis** is short-term, focusing on the statistics generated by market activity.

## Investment Strategies

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We strive for higher equity growth and income than the S&P with a target of having lower beta, income assets with attractive yields and a defensive strategy focused on protecting assets during market downturns. **Bryan Perry's Private Clients'** investment strategies are as follows:

### Tactical Growth Portfolio

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**Primary Goal:** Our tactical growth strategy is designed to focus on maximize returns while striving to manage risks by investing in leading companies in their respective fields with growth potential, offering innovative products and services to a rapidly expanding marketplace. We focus on identifying companies with sustainable competitive advantages, strong management teams, and a proven track record of delivering consistent growth. By investing in such companies, we believe we can generate superior returns over the long term.

#### Investment Process:

- ❖ Active management of high-growth stocks and high-beta ETFs that are characterized by higher risk/reward ratios.
- ❖ Market hedges through the use of cash or -1X inverse index ETFs.
- ❖ We may elect to maintain up to a 100% cash position of total assets, depending on market conditions.
- ❖ Managing a diversified-by-sector portfolio consisting of large-cap, mid-cap and small-cap equities targeting inefficiently priced high-growth companies with significant potential for long-term price appreciation.
- ❖ As higher-multiple stocks carry a higher degree of volatility, a larger emphasis is placed on technical analysis in the course of portfolio management.
- ❖ Identify sector rotation sensitive to ETF fund flows whereby stock and ETF selection is validated by fundamental quantitative sales and earnings momentum analysis, technical overlays.
- ❖ Length of trades are based on directional trading discipline that depends on various technical indicators and analysis.

### Growth and Income Portfolio

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**Primary Goal:** By investing in a variety of growth and income-oriented assets, this growth and income strategy aims to offer investors a balance of growth potential and income. By doing this, we aspire to offer investors a consistent flow of income while also diversifying into long-term capital appreciation investments through growth-oriented securities.

#### Investment Process:

- ❖ An allocation of large-cap equities and ETFs combined with a covered-call option strategy to enhance portfolio yield.
- ❖ The portfolio may invest in both growth and value stocks.
- ❖ Identify sector rotation sensitive to ETF fund flow whereby stock and ETF selection is validated by fundamental quantitative sales and earnings momentum analysis and technical overlays.
- ❖ Market hedges in the form of cash, Treasury ETFs, Treasury STRIPS and -1x inverse index ETFs.
- ❖ We may elect to maintain up to a 100% cash position of total assets, depending on market conditions.

- ❖ Actively managed to maintain the highest potential for maximizing short-term overbought technical conditions within individual stocks and ETFs to execute out-of-the-money call options with a focus on 30 to 90-day expiration dates.
- ❖ Pursue cost and tax-efficient execution of the buying and selling of portfolio holdings to qualify and maximize long-term capital gains treatment.
- ❖ Strive to diversify holdings centered around risk management.

### **Conservative Model Portfolio**

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**Primary Goal:** The goal for a conservative investment strategy is to create a diversified portfolio that balances income and growth while also managing risk. The emphasis is on generating income through dividends, interest, and other sources, while also seeking some capital appreciation over the long term. This strategy strives to provide investors with a steady stream of income. Covered call option strategies may be employed to enhance income. Overall, this strategy aims to provide a stable return on investment while managing risk through diversification and income generation.

**Investment Process:** We will focus on a mix of different asset classes, such as:

- ❖ Treasuries and government agency notes and bonds: These could make up a portion of the portfolio to provide a low-risk foundation and preserve capital.
- ❖ Investment grade short duration corporate bonds: These could be included to add some yield potential and diversification.
- ❖ Government insured money markets: These could be included for liquidity and short-term cash management.
- ❖ investment grade preferred stocks: This asset class could be included for its high dividend yield and potential for capital appreciation.
- ❖ Real Estate Investment Trusts (REITs): These could be included to provide exposure to the real estate market and generate additional income.
- ❖ Dividend stocks that are hedged via a covered call option strategy: These could be included to provide further diversification and the potential for additional income through a covered call option strategy.

### **Income Portfolio**

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**Primary Goal:** To provide current income, with capital appreciation as a secondary objective to investors with a higher risk tolerance for income generation that exceeds that of short-term conventional investment grade fixed income assets.

**Investment Process:** The strategy seeks to achieve its investment objectives by utilizing a dynamic asset allocation strategy deployed among multiple fixed and non-fixed income sectors in the global markets, including corporate debt, mortgage-related and other asset-backed securities, government and sovereign debt, floating-rate income-producing securities, REITs and common stocks.

### **Other Investment Strategies**

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In addition, we may use long term purchases, short term purchases, trading, short sales, margin transactions, options, and alternative assets when managing your assets.

Long-term purchases are investments held at least a year.

Short-term purchases are investments sold within a year.

Trading involves holding securities for less than 30 days.

**You should be aware that frequent trading can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.**

Short sales involve selling securities that the investor does not own and delivering the borrowed securities to the purchaser, with an obligation to replace the borrowed securities at a later date. The securities are borrowed from a third party, typically a broker-dealer. If the price of the securities declines between the date of sale and date of repurchase, the investor will profit to the extent that the decline in price exceeds the investor's transaction and borrowing expenses. The investor will incur a loss if the price of the securities rises.

Margin transactions involve the use current holdings as collateral to buy additional securities.

Options are contracts that give the owner the right to buy or sell a security at a specific price and period of time. When an investor sells (writes) an option, the investor must deliver to the buyer a specified number of shares if the buyer exercises the option. The seller pays the buyer a premium (the market price of the option at a particular time) in exchange for writing the option. When buying an option, the investor has the right to purchase or sell a security at a specified price until the expiration date of the option.

## Managing Risk

The biggest risk to you is the risk that the value of your investment portfolio will decrease due to moves in the market. This risk is referred to as the **market risk** factor, also known as variability or volatility risk. Other important risk factors:

- ❖ **Interest Rate Risk** - Interest rate risk affects the value of bonds more than stocks. Essentially, when the interest rate on a bond begins to rise, the value (bond price) begins to drop; and vice versa, when interest rates on a bond fall, the bond value rises.
- ❖ **Equity Risk** - Equity risk is the risk that the value of your stocks will depreciate due to stock market dynamics causing one to lose money.
- ❖ **Currency Risk** - Currency risk is the risk that arises from the change in price of one currency against that of another. Investment values in international securities can be affected by changes in exchange rates.
- ❖ **Inflation Risk** - The reduction of purchasing power of investments over time.
- ❖ **Commodity Risk** - Commodity risk refers to the uncertainties of future market values and the size of future income caused by the fluctuation in the prices of commodities (i.e., grains, metals, food, electricity, etc.).
- ❖ **Margin Risk** - Margin transactions may result in losses greater than the amount deposited in the investor's margin account. This may require additional funds to be deposited or securities to be sold at a disadvantage to the investor.
- ❖ **Options Risk** - Options on securities may be subject to greater fluctuations in value than an investment in the underlying securities. Purchasing and writing put and call options are highly specialized activities and entail greater than ordinary investment risks.
- ❖ **Leveraged Funds** - Leveraged mutual funds and ETFs seek to provide leveraged returns at multiples of the underlying benchmark or index they track. Leveraged funds generally seek to provide a multiple of the daily return of an index or other benchmark for a single day excluding fees and other expenses. In addition to using leverage, these funds often use derivative products such as options, futures contracts, and swaps to accomplish their objectives. The use of leverage and derivative instruments can cause leveraged funds to be volatile and subject to extreme price movements.
- ❖ **Inverse Funds** - Inverse mutual funds and ETFs seek to provide the opposite of the performance of the index or benchmark they track. Their objective is to profit from, or hedge exposure to, downward moving markets. Some inverse funds also use leverage when seeking to achieve a return that is a multiple of the opposite performance of the underlying index or benchmark. These funds may also use derivative instruments to accomplish their investment objectives. Inverse funds are volatile and provide the potential for significant losses.

The risk factors we have cited here are not intended to be an exhaustive list but are the most common risks your portfolio will encounter. Other risks that we have not defined could be political, over-concentration, and liquidity to name a few. However, notwithstanding these risk factors, the most important thing for you to understand is that regardless of how we analyze securities or the investment strategy and methodology we use to guide us in the management of your investment portfolio, **investing in a security involves a risk of loss that you should be willing and prepared to bear. Furthermore, past market performance is no guarantee that you will see equal or better future returns on your investment.**

## ITEM 9

**DISCIPLINARY INFORMATION**

Although Mint Asset Management is not subject to the regulatory oversight of FINRA, the following event is being disclosed to comply with the Company's duty of full and fair disclosure to its clients. In 1999, the NASD (now FINRA) alleged that Mr. Fishman operated a broker-dealer without an introducing broker-dealer financial operations principal (FINOP) and failed to maintain written supervisory procedures that addressed the receipt of client checks, thus resulting in a violation of SEC net capital rules. Without admitting or denying the allegations, Mr. Fishman consented to the NASD Letter of Acceptance, Waiver, and Consent and agreed to a \$5,000 fine, a six-month suspension from associating with any broker-dealer as a general securities principal (i.e., function in a supervisory capacity), and to requalify by examination as a general securities principal. Mr. Fishman has since paid the fine and successfully passed the Series 24 (general securities principal exam). No further action was taken by FINRA and Mr. Fishman has since been operating in good standing with securities regulators.

## ITEM 10

**OTHER FINANCIAL INDUSTRY ACTIVITIES & AFFILIATIONS****Financial Industry Activities**

One of our supervised persons, Bryan Perry, writes investment newsletters in his individual capacity as an independent contractor for Eagle Financial Publishing, an investment news publisher. Newsletters authored by Mr. Perry are published on a regular basis and provide subscribers with access to various investment strategies and recommendations. The ideas, thoughts and opinions reflected in the newsletters are his own and do not purport to meet the investment objectives or financial needs of specific individuals or accounts. From time to time, strategies and recommendations discussed in the newsletters will be implemented in our personal accounts and client accounts managed by Mint. Therefore, to prevent our supervised persons from misusing and misappropriating any information that they become aware of prior to the publication of the newsletters, we have adopted a trading policy that, among other things, allows our Chief Compliance Officer to restrict trading in certain investments prior to and/or following the publication of a newsletter.

Other than the activity disclosed above, none of our supervised persons are licensed, or are related to, another financial industry participant.

## ITEM 11

**CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS & PERSONAL TRADING****Code of Ethics**

As a fiduciary, the Company has an affirmative duty to render continuous, unbiased investment advice, and at all times act in your best interest. To maintain this ethical responsibility, we have adopted a Code of Ethics that establishes the fundamental principles of conduct and

professionalism expected by all personnel in discharging their duties. This Code is a value-laden guide committing such persons to uphold the highest ethical standards, rooted in the most elementary maxim. Our Code of Ethics is designed to deter inappropriate behavior and heighten awareness as to what is right, fair, just and good by promoting:

- ❖ Honest and ethical conduct.
- ❖ Full, fair and accurate disclosure.
- ❖ Compliance with applicable rules and regulations.
- ❖ Reporting of any violation of the Code.
- ❖ Accountability.

To help you understand our ethical culture and standards, how we control sensitive information and what steps have been taken to prevent personnel from abusing their inside position, a copy of our Code of Ethics is available for review upon request.

## Client Transactions

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We have a fiduciary duty to ensure that your welfare is not subordinated to any interests of ours or of our personnel. The following disclosures are internal guidelines we have adopted to assist us in protecting all of our clientele.

### Participation or Interest

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It is against our policies for any owners, officers, directors and employees to invest with you or with a group of clients, or to advise you or a group of clients to invest in a private business interest or other non-marketable investment unless prior approval has been granted by our Chief Compliance Officer, and such investment is not in violation of any SEC and/or State rules and regulations.

### Insider Trading Policy

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We comply with the Insider Trading and Securities Fraud Enforcement Act of 1988. We do not share any non-public information with anyone who does not need to know and have established internal controls to guard your personal information.

## Personal Trading

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Employees of ours are permitted to personally invest their own monies in securities, which may also be, from time to time, recommended to you. Sometimes, such investment purchases are independent of, and not connected in any way to, the investment decisions made on your behalf. However, there may be instances where investment purchases for you may also be made, at or about the same time, in an employee's account. This practice can create a conflict of interest as our employees may benefit from the sale and purchase of those securities. In these situations, we have implemented the following guidelines in order to ensure our fiduciary integrity:

1. No employee acting as an Investment Advisor Representative ("IAR"), or who has discretion over your account, shall buy or sell securities for their personal portfolio(s) where their decision is substantially derived, in whole or in part, by reason of his or her employment, unless the information is also available to the investing public on reasonable inquiry. No employee of ours shall prefer his or her own interest to that of yours or any other advisory client.
2. Our Chief Compliance Officer, or a designated supervisor, reviews securities holdings for all our access employees on a regular basis.
3. We require that all employees act in accordance with all applicable Federal and State regulations governing registered investment advisory practices.



4. Bunched orders (See “Aggregating Trade Orders” below under Item 12, “**Brokerage Practices**”) may include employee accounts. In such cases, priority and advantage will be given to satisfy your order first regardless of the situation.
5. Any individual not in observance of the above may be subject to termination.

Personal trading activities are monitored by our Chief Compliance Officer to ensure that such activities do not impact upon your security or create conflicts of interest.

## ITEM 12

**BROKERAGE PRACTICES****Custodial Services**

The Company typically recommends the custodial services of Charles Schwab & Company, Inc. (“Schwab”) and Interactive Brokers, LLC (“Interactive Brokers”), both of which are registered broker-dealers and members of FINRA and SIPC. Schwab and Interactive Brokers offer us services, which include custody of securities, trade execution, clearance and settlement of transactions.

Our recommendation for you to custody your assets with Schwab or Interactive Brokers has no direct correlation to the services we receive from the Custodians and the investment advice we offer you, although **we do receive economic benefits for which we do not have to pay** through our relationship with the Custodians that are typically not available to Schwab and Interactive Brokers retail clients. This creates an incentive for us to recommend Schwab and Interactive Brokers based on the economic benefits we receive rather than on your interest in receiving most favorable execution. These economic benefits include the following products and services provided without cost or at a discount:

- ❖ Receipt of duplicate client statements and confirmations;
- ❖ Research related products and tools and consulting services;
- ❖ Access to a dedicated trading desk;
- ❖ Access to batch trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to accounts);
- ❖ The ability to have advisory fees deducted directly from accounts;
- ❖ Access to an electronic communications network for order entry and account information; and,

We are not a subsidiary of, or an affiliated entity of, Schwab or Interactive Brokers. We have sole responsibility for investment advice rendered, and our advisory services are provided separately and independently from Schwab and Interactive Brokers.

**Direction of Transactions and Commission Rates (Best Execution)**

We have a fiduciary duty to put your interests before our own. The advisory support services we receive from these custodians creates an economic benefit to us and a potential conflict of interest to you; in that, our recommendation to custody your account(s) with Schwab or Interactive Brokers may have been influenced by these arrangements/services. This is not the case; we have selected Schwab and Interactive Brokers as our custodian of choice based on:

1. Their competitive transaction charges, trading platform, and on-line services for account administration and operational support.
2. Their general reputation, trading capabilities, investment inventory, their financial strength, and our personal experience in working with Schwab and Interactive Brokers staff.

Since we do not recommend, suggest, or make available a selection of custodians other than Schwab and Interactive Brokers, best execution may not always be achieved. Therefore, you do not have to accept our recommendation to use Schwab or Interactive Brokers as your custodian. However, if you direct us to use another custodian, we may not be able to provide you complete institutional services and such service may cost you more in transaction fees.

### Selection of Third-Party Money Managers

We may select various TPM's to manage your portfolio accounts. We will assist you in determining which is most likely to provide the most effective financial growth based on your stated investment objectives and risk tolerance level. Where applicable, the brokerage practices of the TPM will be disclosed in their ADV Part 2A: Firm Brochure, which we will provide you prior to engaging the money manager to manage your account. As disclosed in Item 5, "Fees & Compensation", your management fee will be shared between us and the TPM. Because our fee sharing arrangements vary with each TPM, this creates an incentive for us to recommend TPMs that provide us with a higher portion of your management fee. We mitigate this conflict of interest by fully disclosing to you the details of the fee-sharing arrangement and by selecting TPMs based on how well their investment strategies align with your investment objectives. In addition, prior to engagement and on a periodic basis, we review each TPM to ensure they are properly registered and have the reputation, experience, and credentials to provide investment management services.

While we have exercised our best efforts in evaluating the investment performance and cost of services offered by these TPMs, we make no representation that the TPM to which you are referred has the best investment performance or the lowest portfolio management costs. The selection of TPMs will be limited to those with whom we have entered into service agreements. Therefore, it is possible that you could contract for similar services elsewhere or separately with higher performance at a lower cost. You are under no obligation to accept our recommendation to use a TPM to manage your portfolio.

### Aggregating Trade Orders

Our objective in order execution is to act fairly, impartially, and to take all reasonable steps to obtain the best possible results (known as "best execution") for our clients. Therefore, we typically bunch (aggregate) orders for a block trade when: (i) the bunching of orders is done for the purpose of achieving best execution; and, (ii) no client is systematically advantaged or disadvantaged by bunching the orders.

In consideration of these objectives, we will take into account the unique execution factors of the buy/sell order before bunching accounts for a block trade. A few of those factors are:

- ❖ **Security Trading Volume** - Bunching orders in a block trade can secure price parity and continuity for our clients during heavy trading activity.
- ❖ **Number of Clients** - The fewer the number of client accounts involved in the bunched order may not yield better pricing or order execution; it may be more advantageous to perform an individual market order for each client. In addition, preparing individual market orders, for the small number accounts involved, may be quicker to complete than preparing a bunch order.
- ❖ **Financial Instruments** - The type of security involved as well as the complexity of order can affect our ability to achieve best execution.



## Portfolio Management Reviews

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Your investment strategies and investments are monitored and reviewed on an ongoing basis by our Managing Member, Steven Fishman, and Portfolio Manager, Bryan Perry. The general economy, market conditions, and/or changes in tax law can trigger more frequent reviews. Cash needs will be adjusted as necessary. Material changes in your personal/financial situation and/or investment objectives will require additional review and evaluation for us to properly advise you on revisions to previous recommendations and/or services. However, it is your responsibility to communicate these changes for us to make the appropriate corrections to your management account(s).

You will receive statements, at least quarterly, from the custodian where your account(s) are held in custody that identifies your current investment holdings, the cost of each of those investments, and their current market values. In addition to receiving account statements from the custodian, we may provide you with a monthly or quarterly written report summarizing your portfolio. You are encouraged to carefully review and compare your account statements with reports that we may send to you. It is important for you to review these documents for accurate reporting and to determine whether we are meeting your investment expectations.

## Third-Party Money Manager Reviews

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If agreed to in writing, our Managing Member, Steven Fishman, will monitor and evaluate the performance of the TPM managing your account on a regular basis. We understand your goals and tolerance for risk may change over time; therefore, even though we may not be involved with the day-to-day management of your assets maintained with a TPM, we will supervise your portfolio and will make recommendations to you regarding the TPMs as market factors and your personal goals dictate.

### ITEM 14

## CLIENT REFERRALS & OTHER COMPENSATION

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### Referral Compensation

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Please see sub-section titled “Selection of Third-Party Money Managers” under Item 12, “Brokerage Practices”, for the conflicts of interest related to referral and fee sharing compensation arrangements with TPMs.

We may directly compensate persons/firms for client referrals, provided those persons are qualified and have entered a solicitation agreement with us. Under such arrangements, if a solicitor referred you to us, the solicitor will provide complete information on our relationship and the compensation that solicitor will receive should you choose to open an account. In no case will the fee that you pay be higher than it would be if you had dealt directly with us. In addition, we will adhere to each State’s rules and regulations where the Solicitor resides prior to entering into any solicitation agreement with that person/firm.

### Other Compensation (Indirect Benefit)

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The Company receives an indirect economic benefit from Schwab and Interactive Brokers (See “Custodial Services” above under Item 12, “Brokerage Practices” for more detailed information on what these services and products could be.).

### Retirement Transfer Compensation

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When it comes to your retirement account, you have four options to consider when transitioning employment from one employer to another, or for when you are seeking full retirement:

- ❖ Leave the account assets in the former employer's plan, if permitted;
- ❖ Transfer the assets to the new employer's plan, if one is available and transfers are permitted;
- ❖ Transfer the account assets to an Individual Retirement Account (an "IRA"); or,
- ❖ Cash out the retirement account assets (There will be tax consequences and/or IRS penalties depending on your age.).

Should you approach us to advise you on which option would be the best for your particular situation, we have an economic incentive to recommend you transfer your retirement account to a managed IRA account with us where we would earn a management fee on the assets. This can create a potential conflict of interest; the objectivity of the advice we render can be subjective and a cost to you. Therefore, if we recommend you transfer your retirement account to an IRA account, you are under no obligation to engage us to manage your assets. You are free to take your account anywhere.

## ITEM 15

**CUSTODY****Management Fee Deduction**

We do not take possession of or maintain custody of your funds or securities but will simply monitor the holdings within your portfolio and trade your account based on your stated investment objectives and guidelines. Physical possession and custody of your funds and/or securities are maintained with a qualified custodian as indicated above in Item 12, "Brokerage Practices."

We do however, meet the definition of custody since you have authorized us to deduct our advisory fees directly from your account. Therefore, to comply with the custody requirements for investment advisers under SEC Rule 206(4)-2, and to protect you as well as to protect our advisory practice, we have implemented the following regulatory safeguards:

- ❖ Your funds and securities will be maintained with a qualified custodian (Schwab or Interactive Brokers) in a separate account in your name.
- ❖ Authorization to withdraw our management fees directly from your account will be approved by you prior to engaging in any portfolio management services.

In addition, the custodian is required by law to send you, at least quarterly, brokerage statements summarizing the specific investments currently held in your account, the value of your portfolio, and account transactions. You are encouraged to compare and review the financial data contained in our reports and fee invoices to the account statement received from the custodian to verify the accuracy of our reporting and billing. The account custodian does not verify the accuracy of the portfolio management fee calculation.

## ITEM 16

**INVESTMENT DISCRETION**

We provide investment management services on a discretionary basis. If you engage us for such services, you may place limitations, in writing, on our discretionary authority to the extent that the limitations do not adversely affect our ability to properly manage your account. Prior to us exercising discretionary authority in your account, you will be required to execute an investment advisory agreement or limited power of attorney, granting us full authority to supervise and direct the investments in your account. Although we have this authority, you retain all rights of ownership of the account and may revoke this authority at any time.

ITEM 17

**VOTING CLIENT SECURITIES**

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**We do not vote client proxies.** You understand and agree that you retain the right to vote all proxies solicited for securities held in your managed accounts. The custodian of your managed accounts will mail you all proxy solicitations. Any proxy solicitations inadvertently received by us will be immediately forwarded to you for your evaluation and decision.

However, if you have specific questions regarding an action being solicited by the proxy that you do not understand or you want clarification, you may contact us and we will explain the particulars. Keep in mind we will not advise you in a direction to vote; the ultimate decision on how you vote is your responsibility and left to you to decide.

ITEM 18

**FINANCIAL INFORMATION**

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We are not required to include financial information in our Disclosure Brochure since we will not take physical custody of client funds or securities or bill client accounts six (6) months or more in advance for more than \$500.

We are not aware of any current financial conditions that are likely to impair our ability to meet our contractual commitments to you. In addition, the Company has not, nor have any of our officers and directors, been the subject of a bankruptcy petition at any time during the past ten years.

**END OF DISCLOSURE BROCHURE**

**FORM ADV: PART 2B**  
BROCHURE SUPPLEMENT

**MINT**

ASSET MANAGEMENT

**CONTACT INFORMATION**

165 Broadway, 23<sup>rd</sup> Floor  
New York, NY 10006

Tel: 908.777.1717

[www.mintassetmanagement.com](http://www.mintassetmanagement.com)

BROCHURE SUPPLEMENT  
DATED

**1**  
**OCTOBER**  
**2024**

This Brochure Supplement provides information about Bryan A. Perry that is an accompaniment to the Disclosure Brochure for our firm, Mint Asset Management, LLC. You should have received both of these together as a complete disclosure packet. If you did not receive our Disclosure Brochure or if you should have questions about this Brochure Supplement for Mr. Perry, you are welcome to contact us - our contact information is listed to the left.

Additional information about Mint Asset Management, LLC and Bryan A. Perry is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**Bryan A. Perry**

CRD#: 1232078

Year of Birth: 1959

**ITEM 2 - EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE**

**Education**

1982 - Virginia Tech: Bachelor of Arts in Political Science

**Licenses**

FINRA Exams: Series 65 - Uniform Investment Advisor Law Examination

**Business Background**

01/2023 - Present.....Mint Asset Management LLC  
Position: Portfolio Manager

03/2015 - Present.....Eagle Financial Publications  
Position: Independent Contractor

09/2007 - Present.....Kona Body Care, LLC  
Position: Managing Member

07/1999 - Present.....Alexander Perry Corporation  
Position: President

01/2016 - 01/2023 .....Navellier & Associates, Inc.  
Position: Sr. Director Private Client Services

**ITEM 3 - DISCIPLINARY INFORMATION**

Mr. Perry has reportable disclosure events, the details of which on FINRA's BrokerCheck website at <https://brokercheck.finra.org> or the SEC IAPD website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**ITEM 4 - OTHER BUSINESS ACTIVITIES**

In addition to his role with Mint Asset Management LLC, Mr. Perry is a (i) Managing Member with Kona Body Care, LLC, a personal care products manufacturer; (ii) President with Alexander Perry Corporation, a freelance editor for various media outlets; and (iii) Independent Contractor with Eagle Financial Publications ("EFP"), an investment news publisher. These businesses provide a substantial source of Mr. Perry's income and involve a substantial amount of his time.

In his role with EFP, Mr. Perry authors a newsletter that includes investment strategies and recommendations. The advice provided is impersonal, not tailored to the investment needs of any individual. Since the investments discussed in his newsletters may be held in our personal accounts and client accounts managed by Mint, we have adopted a trading policy to prevent unethical trading behavior. For more information, please see Form ADV Part 2A, Item 10, "Other Financial Industry Activities & Affiliations."

Mr. Perry may spend up to 60% of his time engaged in these other business activities. His responsibility to these other business activities may occasionally create a time management conflict that you should consider. However, Mr. Perry feels his responsibilities relating to these business activities will not distract from his duty to monitor your investment portfolio.

**ITEM 5 - ADDITIONAL COMPENSATION**

Mr. Perry does not receive any economic benefit, incentives, sales awards, prizes or bonuses that are based on the number or amount of sales, client referrals, or from opening new accounts.

**ITEM 6 - SUPERVISION**

**Steven Fishman**

Managing Member & Chief Compliance Officer

Tel: 908.777.1717

Mr. Fishman is responsible for the regulatory oversight of our advisory practice - ensuring our business activities are compliant with all federal and state regulations and that we are operating in compliance with our written policies and procedures.

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**FORM ADV: PART 2B**  
BROCHURE SUPPLEMENT

**MINT**

ASSET MANAGEMENT

**CONTACT INFORMATION**

165 Broadway, 23<sup>rd</sup> Floor  
New York, NY 10006

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[www.mintassetmanagement.com](http://www.mintassetmanagement.com)

BROCHURE SUPPLEMENT  
DATED

**1**  
**OCTOBER**  
**2024**

This Brochure Supplement provides information about Steven Fishman that is an accompaniment to the Disclosure Brochure for our firm, Mint Asset Management, LLC. You should have received both of these together as a complete disclosure packet. If you did not receive our Disclosure Brochure or if you should have questions about this Brochure Supplement for Mr. Fishman, you are welcome to contact us - our contact information is listed to the left.

Additional information about Mint Asset Management, LLC and Steven Fishman is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**Steven Fishman**

CRD#: 2428781

Year of Birth: 1968

**ITEM 2 - EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE**

**Education**

1994 - City University of NY - College of Staten Island: Bachelor of Science in Finance

**Licenses**

FINRA Exams: Series 65 - Uniform Investment Advisor Law Examination

**Business Background**

03/2020 - Present.....Mint Asset Management LLC

**Position:** Managing Member & Chief Compliance Officer

01/2012 - Present.....Savvy Investor LLC

**Position:** Partner

11/2011 - Present.....Green Earth Merchants LLC

**Position:** General Partner

04/2008 - Present.....Danimax LLC

**Position:** General Partner

**ITEM 3 - DISCIPLINARY INFORMATION**

Mr. Fishman has not been the subject of any legal or disciplinary action by any court, regulatory agency, or self-regulatory organization in the past ten years.

**ITEM 4 - OTHER BUSINESS ACTIVITIES**

In addition to his role with Mint Asset Management LLC, Mr. Fishman is a (i) Partner with Savvy Investor LLC, a marketing consulting firm for publishing companies and financial institutions; (ii) General Partner with Green Earth Merchants LLC, a credit card processing company; and (iii) General Partner with Danimax LLC, the holding company for Savvy Investor LLC and Green Earth Merchants LLC. These businesses provide a substantial source of Mr. Fishman's income and involve a substantial amount of his time.

**Potential Time Management Conflict**

Mr. Fishman may spend approximately 25 hours per month engaged in these other business activities. His responsibility to these other business activities may occasionally create a time management conflict that you should consider. However, Mr. Fishman feels his responsibilities relating to these business activities will not distract from his duty to monitor your investment portfolio.

**ITEM 5 - ADDITIONAL COMPENSATION**

Mr. Fishman does not receive any economic benefit, incentives, sales awards, prizes or bonuses that are based on the number or amount of sales, client referrals, or from opening new accounts.

**ITEM 6 - SUPERVISION**

**Steven Fishman**

Managing Member & Chief Compliance Officer

Tel: 908.777.1717

Mr. Fishman is responsible for the regulatory oversight of our advisory practice - ensuring our business activities are compliant with all federal and state regulations and that we are operating in compliance with our written policies and procedures. His other duties include, but are not limited to, meeting periodically with all employees to impress upon them their fundamental principles of conduct and professionalism in following our Code of Ethics and confirming they are acting in our clients' best interests in discharging their duties.

**MINT**

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