

March 28, 2024

Ducenta Squared Asset Management (“DSAM,” “we,” “us,” or “our firm”) is an investment adviser registered with the Securities and Exchange Commission. Brokerage and investment advisory services and fees differ; it is important for the retail investor to understand the differences. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://www.investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing.

### **What investment services and advice can you provide me?**

We offer investment advisory services to retail investors directly and through wrap platforms sponsored by third parties. These services utilize a variety of investment strategies that principally include fixed income securities and other instruments. As a component of our firm’s standard services, we proactively review client portfolios for consistency with strategy and monitor investments on an ongoing basis. We do not offer other services, such as financial planning, tax, or estate planning. The investment advisory services we offer retail investors consist of discretionary separate account management; we do not offer non-discretionary investment advisory services to retail investors. The discretionary authority you provided to us is broad and not subject to material limitations. This permits us to conduct buy and sell transactions in your account without your prior approval of each transaction - we execute the investment strategy you have contracted us to perform, within your investment objective and risk tolerances set forth in the client agreement. Any discretionary authority you provided to us is revocable by you at any time by written notice. We offer investment advisory services only with regards to fixed income investment strategies and products approved by the applicable financial advisor for its platform. Our firm’s minimum account size for retail investors is \$250,000 and for private wealth strategies the minimums vary from \$300,000 for Core and Core Plus to \$500,000 for High Yield, although the firm may make exceptions to minimum account sizes on a case-by-case basis. Each client is responsible for establishing and maintaining an appropriate account with a qualified custodian. For more detailed information and disclosures pertaining to the firm’s investment advisory services, refer to Items 4 and 7 of the firm’s Form ADV, Part 2A, which is available through the Investment Adviser Public Disclosure site, [adviserinfo.sec.gov](https://adviserinfo.sec.gov), or through an email request to [clientrelations@ducentasquared.com](mailto:clientrelations@ducentasquared.com).

***Conversation Starters: Given my financial situation, should I choose an investment advisory service? Why or why not? How will you choose investments to recommend to me? What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?***

### **What fees will I pay?**

DSAM assesses asset-based fees for retail investors’ separately managed accounts. These fees are negotiable, vary depending on the investment strategy, the product type, the size of a specific client account, and the nature and level of services we provide. These fees generally can range up to 0.55% (55 basis points) of assets under management in the client account. These fees are assessed quarterly (payable in advance or arrears) and are based upon the aggregate fair value of the client’s portfolio in accordance with the client agreement.

For clients managed through wrap platforms, additional fees charged by platform sponsors apply. Such sponsor fees typically encompass fees for additional services, such as custody, and are separate from the fee charged by DSAM. Clients may also incur charges imposed by third parties, such as investment management fees, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, transaction charges imposed by the broker-dealer executing securities transactions for the client’s account, other fees and taxes on brokerage accounts and securities transactions, and fees and expenses imposed directly by any funds held in or for the client’s account.

We currently manage accounts that pay a performance fee. Conflicts of interest arise from our firm’s management of accounts that are assessed performance fees and accounts that are not assessed performance fees (such as asset-based fees or fixed fees) in that the firm may have an incentive to allocate limited investment opportunities to clients that pay higher fees or take greater risk in an attempt to generate higher returns. We have adopted order aggregation and trade allocation policies and procedures designed to treat all clients fairly and equitably and to prevent these conflicts from influencing the allocation of investment opportunities among clients. During periods of unusual market conditions, we may deviate from our firm’s normal trade allocation practices.

**You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.**

*For more detailed information and disclosures pertaining to the firm’s fees and costs, refer to Item 5 of the firm’s Form ADV, Part 2A, which is available through the Investment Adviser Public Disclosure site, [adviserinfo.sec.gov](https://adviserinfo.sec.gov), or through an email request to [clientrelations@ducentasquared.com](mailto:clientrelations@ducentasquared.com).*

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***Conversation Starters: Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?***

**What are your legal obligations to me when acting as my investment adviser?  
How else does your firm make money and what conflicts of interest do you have?**

*When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here are some examples to help you understand what this means.*

DSAM has a conflict of interest regarding advice given on adding new assets or transferring assets into accounts managed by our firm in that we receive compensation based upon the total value of assets in your account. Please also note the above disclosure pertaining to side-by-side management of accounts assessed asset-based fees and accounts assessed performance fees. Our firm's CEO has an interest in a proprietary institutional account managed by a related person. This proprietary account's investment strategy is currently limited to investments in securities issued by the United States Treasury, agency and non-agency mortgage-backed securities, and interests in collateralized loan obligations. While the markets for the securities have significant breadth, it is possible that we may buy and sell the same securities for client accounts and such proprietary account; however, if an investment opportunity is offered to the proprietary account and any other client account, the proprietary account will not participate in such investment.

***Conversation Starter: How might your conflicts of interest affect me, and how will you address them?***

*For more detailed information and disclosures pertaining to the firm's conflicts of interest, refer to the firm's Form ADV, Part 2A, which is available through the Investment Adviser Public Disclosure site, [adviserinfo.sec.gov](http://adviserinfo.sec.gov), or through an email request to [clientrelations@ducentasquared.com](mailto:clientrelations@ducentasquared.com).*

**How do your financial professionals make money?**

DSAM's key personnel, including all portfolio managers, have entered into employment agreements with DSAM pursuant to which they receive a salary. They are also eligible for an annual cash bonus based on several factors, including the firm's overall profitability. Additionally, DSAM's key personnel receive normal and customary employee benefits generally available to all salaried employees. Each of DSAM's key personnel own an equity interest in DSAM, thereby benefiting from increases in the net income of DSAM. Conflicts of interest arise from these compensation arrangements in that key personnel have an incentive to recommend DSAM products and services over products and services from unaffiliated entities, even though such other products and services may be offered at a similar or lower cost.

**Do you or your financial professionals have legal or disciplinary history?**

No, free and simple tools are available to research firms and financial professionals at [Investor.gov](http://Investor.gov)/CRS, which also provides educational materials about broker-dealers, investment advisers, and investing.

***Conversation Starter: As a financial professional, do you have any disciplinary history? For what type of conduct?***

*Additional information about our investment advisory services, including a copy of this Form CRS, can be found through the Investment Adviser Public Disclosure site, [adviserinfo.sec.gov](http://adviserinfo.sec.gov), or through an email request to [clientrelations@ducentasquared.com](mailto:clientrelations@ducentasquared.com). To request up-to-date information and a copy of this Form CRS, you may call DSAM at (213) 687-9170.*

***Conversation Starters: Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?***