

INFORMATION BROCHURE  
ADVISORS ACT RULE 204-3  
ON

DIAMANT ASSET MANAGEMENT, INC.

440 MAIN STREET  
RIDGEFIELD, CONNECTICUT 06877

www.portfolioadvisor.com  
203-661-6410

Dated 04/01/2024

PART II OF FORM ADV  
INVESTMENT ADVISOR REGISTRATION  
ON FILE WITH THE  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON D.C.

AS PER ADVISORS ACT RULE 204-3

Item 1 – Cover Page

This Brochure provides information about the qualifications and business practices of Diamant Asset Management, Inc. If you have any questions about the contents of this Brochure, please contact us at 203-661-6410. 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.

Diamant Asset Management, Inc. is a registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser. Additional information about Diamant Asset Management, Inc. also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 – Material Changes

On July 28, 2010, the United State Securities and Exchange Commission published “Amendments to Form ADV” which amends the disclosure document that we provide to clients as required by SEC Rules. This Brochure dated 04/01/2024 is a similar document to our previous brochure dated 03/20/2024, which was prepared according to the SEC’s requirements and rules.

This section discusses only specific material changes that are made to the Brochure and provides clients with a summary of such changes. This update reflects the resignation of an employee.

The date of our last annual update of this brochure was 3/20/2024.

In the past we have offered or delivered information about our qualifications and business practices to clients on at least an annual basis. Pursuant to SEC Rules, we will ensure that you receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of our business’ fiscal year. We may further provide other ongoing disclosure information about material changes as necessary.

We will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

Currently, our Brochure may be requested by contacting Herbert Diamant at 203-661-6410. Additional information about Diamant Asset Management, Inc. is also available via the SEC’s web site [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The SEC’s web site also provides information about any persons affiliated with Diamant Asset Management, Inc. who are registered, or are required to be registered, as investment adviser representatives of Diamant Asset Management, Inc.

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#### Item 4 – Advisory Business

Diamant Asset Management, Inc. (“Investment Manager”) provides investment advisory and supervisory services on a discretionary basis for a broad base of clients, including individuals, families, trusts, and retirement plans. Services may include defining investment objectives, asset allocation among types of securities, and portfolio management of equity and income oriented accounts.

In providing its services, the sole standard of care imposed upon Investment Manager shall be to act with the care, skill, prudence, and diligence under the circumstances then prevailing that a prudent investment advisor acting in a like capacity and familiar with such matters would use in the conduct of a like character with like aims. In addition, Investment Manager assumes no responsibility for the accuracy of information furnished to Investment Manager by a client or a client's agent. With respect to investing in mutual funds, the client in effect will be paying two management fees, one to Investment Manager and one to the mutual fund advisor.

Investment Manager was granted registration on December 10<sup>th</sup> 1986, as an investment advisor pursuant to Section 203 of the Investment Advisers Act of 1940. Herbert Diamant is the principal shareholder of Investment Manager. Mr. Diamant has been engaged in the business of providing investment services to investment clientele since 1978. Prior investment services were rendered through Diamant Investment Corporation, which was an affiliated broker-dealer. That firm no longer exists as a registered broker-dealer.

For more than forty-five years, the Diamant family continues to be actively involved in the investment business as the sole owners of both Diamant Asset Management, Inc. and Diamant Investment Corporation. The Diamant’s remain committed to providing senior level, long term investment advice and personal client attention. We avoid continuous turnover of key personnel to enable continuity of our relationships.

A client's account is handled by a senior portfolio manager who is an experienced professional. Although we require a minimum of 7 years of investment experience before becoming a portfolio manager, Herbert Diamant has 46 years of experience, and Sheila Morgan has over 18 years of experience. The combined investment experience and seasoning of our portfolio managers has occurred through many economic and market conditions. To provide its hallmark of high quality and hands on service to its clients, Investment Manager restricts portfolio management to a limited number of sizable accounts. As of December 31, 2023, assets under management were \$210,747,823, all of which was held in discretionary accounts.

#### Item 5 – Fees and Compensation

The specific manner in which fees are charged by Investment Manager is established in a client’s written agreement with Investment Manager. Fees are billed on a quarterly basis in arrears. Advisory fees will not be prorated for each capital contribution and withdrawal made during the applicable

calendar quarter. The amount of the portfolio management fee is negotiable. Accounts initiated or terminated during a quarterly period will be charged a prorated fee. Upon termination of any account, any earned, unpaid fees will be due and payable. Advisory fees will be determined as of the close of business on the date at the end of each calendar quarter and will be charged within a two week period following the end of the quarter. Low balance clients paying the minimum fee may end up with high effective fee rates and lower cost alternatives may be available. Advisory fees will be allocated proportionally between the accounts based on portfolio valuations. Management of the account will commence upon receipt of assets into the account. Clients authorize Investment Manager to directly debit fees from client accounts.

The annual fee schedule is based on a percentage of the market value and type of assets placed under management. Fees are calculated by separating the equity and fixed income bond segments of the overall portfolio. The Equities fee schedule is applied to the equities segment of the overall portfolio, and the Fixed Income Bonds fee schedule is applied to the fixed income bond segment of the overall portfolio. Cash equivalents are categorized as part of the fixed income bond portfolio.

The total advisory fee charged is the combination of the two segments. The total advisory fee as a percentage of assets will be lower with the inclusion of a fixed income bond segment versus all assets being held in the equity segment.

Equities fee schedule:

<u>Market Value of Portfolio</u>	<u>Annual Fee Rate</u>
\$ 0 to \$1,000,000	1.50%
\$1,000,001 to \$2,500,000	1.25%
\$2,500,001 to \$5,000,000	1.00%
More than \$5,000,000	0.75%

Fixed Income Bonds fee schedule:

<u>Market Value of Portfolio</u>	<u>Annual Fee Rate</u>
\$ 0 to \$1,000,000	0.75%
\$1,000,001 to \$10,000,000	0.50%
More than \$10,000,000	0.375%

Minimum quarterly fee of \$2,000.00

Investment Manager's fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, and other third parties, such as custodial fees, transfer charges, wire transfer fees, and other similar fees and charges on brokerage accounts and securities transactions. Mutual funds and

exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus.

Such charges, fees and commissions are exclusive of and in addition to Investment Manager's fee, and Investment Manager shall not receive any portion of these commissions, fees, and costs.

Item 12 further describes the factors that Investment Manager considers in selecting or recommending a broker-dealer for client transactions and determining the reasonableness of their compensation.

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

Performance based fee arrangements (fees based on a share of capital gains on or capital appreciation of the assets of a client) may create an incentive for an advisor to recommend investments which may be riskier or more speculative than those which would be recommended under a different fee arrangement. As we believe this process is contrary to providing conservative investment guidance, Investment Manager does not charge any performance-based fees.

Side-By-Side Management typically permits an institutional manager to run a hedge fund alongside an investment fund in order to provide higher compensation to the manager. Investment Manager does not engage in this type of business, preferring to focus its efforts serving the needs of individual investors.

## Item 7 – Types of Clients

Investment Manager provides portfolio management services to individuals, high net worth individuals, individual retirement plans, corporate pension and profit-sharing plans, trusts, estates, and foundations.

We typically provide investment advice and management to high net worth individuals and families. Therefore, our focus is on the investment issues relating to individual accounts.

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

The Investment Manager's method of security analysis is mainly fundamental in nature, reviewing information such as sales, profits, strength of balance sheet, product mix, and management. Investment Manager may also use technical charting to confirm decisions.

Our own research and judgment is used to select specific securities for portfolios. The main sources of information include annual reports, filings with the Securities and Exchange Commission, research material prepared by others, financial newspapers and magazines, and corporate rating services. Investment Manager uses Argus Research for macroeconomic research, company specific research,

and for discussions and consultations with their analysts regarding specific stock and industry sector ideas. Investment Manager also relies on information provided from Bloomberg Professional services and data products.

Investment Manager's investment strategy is to tailor each investment portfolio to meet the specific needs of the client. Investment Manager evaluates and designs a portfolio that meets specific objectives. Based on these goals, appropriate securities are selected. Tax impacts are always considered, whether building portfolios or selling holdings. Most importantly, we constantly oversee the portfolio to meet long term investment goals. We buy and hold securities for the long term, and believe very strongly in the preservation of capital through our conservative investing in quality securities.

Our preference is to discuss major investment decisions with our clients. Discussions or correspondence are used to keep clients apprised on how their investments are meeting their objectives. Communication is especially important when designing investment plans and objectives, or with substantial shifts in portfolio strategy.

The investment time horizon of Investment Manager is long term in nature. The investment experience of Investment Manager leads to an investment strategy of a buy and hold approach, selecting quality equity securities that will grow over time, along with secure income securities. Investment Manager's primary strategy does not involve frequent trading of securities, margin, or the use of option strategies in an attempt to amplify returns.

To position portfolios for a long term capital appreciation, Investment Manager buys and sells equity securities primarily listed on a national exchange such as the New York Stock Exchange and the NASDAQ. Our portfolios typically include high quality, domestic, blue chip type stocks, but may include international stocks. Depending on the client's investment objectives, some portfolios may include more aggressive investments in mid-cap and/or small cap stocks. Portfolios may include investments in ETF's (exchange traded funds) to gain access to a particular market or industry sector.

To meet income needs, portfolios of high net worth individual investors may include quality municipal bonds. Portfolios of tax exempt entities (such as retirement accounts) and low tax bracket individuals, may include secure corporate bonds to satisfy income needs. Investment Manager generally avoids investing in below investment grade municipal bonds or corporate bonds, as it focuses on the goal of capital preservation and stable income over the objective of maximizing return. Publicly traded limited partnerships and real estate investment trusts may also be used as income vehicles.

Our client investment portfolios are allocated by selected asset classes, which may include equities, bonds, and cash equivalents. Stock portfolios are further diversified between industry groups and stock selections. Bond holdings are diversified into multiple securities to avoid concentration with one municipality. We believe this investment strategy and style typically does not involve significant or unusual risks. Our experience is that our buy and hold philosophy, combined with a long term time horizon, mitigates material risks. Nonetheless, investing in securities involves risk of loss that clients should be prepared to bear.

## Item 9 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Investment Manager or the integrity of Investment Manager's management. At all times which are material to this disclosure, neither Investment Manager or its personnel has been disciplined.

## Item 10 – Other Financial Industry Activities and Affiliations

Investment Manager has no other financial industry activities or affiliations.

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

Investment Manager's corporate Code of Ethics (Code) establishes standards of conduct that are expected of supervised persons and reflect Investment Manager's fiduciary duties to its clientele. This Code reflects Investment Manager's commitment to high ethical practices and the sharing of responsibility for maintaining those practices among employees. Fundamental to the personnel policies and practices that implement the Code is Investment Manager's insistence that business be conducted in an environment of mutual respect. Many of these policies are based upon laws and regulations, others upon widely held philosophical and ethical principles. Violation of these policies may result in discipline, including termination.

Investment Manager has the responsibility to render professional, continuous, and unbiased investment advice. As a fiduciary, Investment Manager owes its clients a duty of honesty, good faith, and fair dealing. Further, Investment Manager must act at all times in the client's best interests, and must either avoid or disclose conflicts of interest. All employees personal securities transactions shall be conducted in such a manner as to be consistent with the Code, to avoid any actual or potential conflict of interest, or any abuse of an employee's position of trust and responsibility. As a hallmark of Investment Manager's business is confidentiality, information concerning the identity of security holdings and financial circumstances of clients is and must remain confidential.

Each employee shares the responsibility to comply not only with the plain language of these policies and applicable laws, but to embrace the spirit and purposes of these policies in their business and interpersonal conduct. Investment Manager's reputation is built on principles of honesty, integrity, and professionalism, and its ability to prosper in the future is dependent on all employees embracing these principles. All supervised persons at Investment Manager must acknowledge the terms of the Code of Ethics annually, or as amended. Investment Manager will provide a copy of its Code of Ethics to any client, or prospective client, upon written request.



Investment Manager does not recommend, buy, or sell securities in which the advisor has a material financial interest.

Advisory personnel (which includes company officers, employees, directors, stockholders, or members of their families) may at times have a position in the same securities that clients own and may make purchases or sales of these securities from time to time in the open market. Personal trading by Advisory personnel are to be conducted in an ethical manner that complies with industry regulations. The fact that such persons acquire, or not acquire securities themselves or for any other client is not to be considered in determining the advisability of acquiring or not acquiring similar securities for the portfolio account of any client.

All personal securities transactions by Employees must avoid a conflict with the interests of a client. Personal securities trading that may conflict with the interests of any client is strictly prohibited. Clients of Investment Manager have priority on purchases and sales before placing orders for advisory personnel. Advisory personnel must follow Investment Manager's Client Priority Rule detailed in its written supervisory procedures when conducting personal securities trading. When entering the same side trades from a customer and advisory personnel, the customer trade shall be entered ahead of the advisory personnel trade, except where the market is liquid enough where entering simultaneous trades would not impact market depth or ability to execute the customer trade. All advisory personnel are subject to specific procedures, including pre-clearance of transactions and detailed trade reporting and compliance review.

## Item 12 – Brokerage Practices

Investment Manager suggests transactions be placed with Fidelity Brokerage Services LLC., which is not affiliated with Investment Manager. Clients are not required to designate this broker-dealer. Substantially all of Investment Manager's clients have authorized Investment Manager to use this broker-dealer to hold securities and handle security transactions. If a Client has selected a directed broker other than Fidelity Brokerage Services LLC., Client agrees the advisor will not be required to effect any transaction through that directed broker if Investment Manager believes that to do so may result in a breach of its duties as a fiduciary. Client understands that by instructing Investment Manager to execute all transactions on behalf of the Account through that directed broker, a disparity may exist between the commissions borne by the Account and the commissions borne by Investment Manager's other client's that do not direct Investment Manager to use a particular broker-dealer. Client also understands that by instructing Investment Manager to execute all transactions on behalf of the Account through such directed broker, Client may not necessarily obtain commission rates and execution as favorable as those that would be obtained if Investment Manager were able to place transactions with Fidelity Brokerage Services LLC.

Each portfolio is individually managed. Decisions to buy and sell are made for each account separately. This process does not create conditions for aggregating the purchase or sale of securities for various client accounts. If the opportunity arises when customers are buying or selling the same security, and market conditions are such that in our judgment the aggregating of the order does not harm the best execution of the transaction, the shares may be aggregated. As the transaction cost is a

small amount of the transaction, the decision to aggregate, or not aggregate orders, does not materially impact the trade cost to the client.

Investment Manager has an arrangement with National Financial Services LLC, and Fidelity Brokerage Services LLC (together with all affiliates, "Fidelity") through which Fidelity provides Investment Manager with Fidelity's "platform" services. The platform services include, among others, brokerage, custodial, administrative support, record keeping and related services that are intended to support intermediaries like Investment Manager in conducting business and in serving the best interests of their clients but that may benefit Investment Manager.

Fidelity charges brokerage commissions and transaction fees for effecting certain securities transactions (i.e., transactions fees are charged for certain no-load mutual funds, commissions are charged for individual equity and debt securities transactions). Fidelity enables Investment Manager to obtain many no-load mutual funds without transaction charges and other no-load funds at nominal transaction charges. Fidelity's commission rates are generally considered discounted from customary retail commission rates. However, the commissions and transaction fees charged by Fidelity may be higher or lower than those charged by other custodians and broker-dealers.

As part of the arrangement, Fidelity also makes available to Investment Manager, at no additional charge to Investment Manager, certain research and brokerage services, including research services obtained by Fidelity directly from independent research companies, as selected by Investment Manager (within specified parameters). These research and brokerage services presently include services on the Fidelity platform as detailed above, typical services to effect purchases and sales of securities, business building solutions ranging from marketing support to client management tools, retirement programs to help meet asset accumulation and income distribution needs of clients, a dedicated relationship manager for consultation and support of day-to-day business needs, a data feed of securities activity, and combined technology integration, training and support. These research and brokerage services are used by Investment Manager to manage accounts for which Investment Manager has investment discretion.

As a result of receiving such services for no additional cost, Investment Manager may have an incentive to continue to use or expand the use of Fidelity's services. Investment Manager examined this potential conflict of interest when it chose to enter into the relationship with Fidelity and has determined that the relationship is in the best interests of Investment Manager's clients and satisfies its client obligations, including its duty to seek best execution. A client may pay a commission that is higher than another qualified broker-dealer might charge to effect the same transaction where the Investment Manager determines in good faith that the commission is reasonable in relation to the value of the brokerage and research services received. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including the value of research provided, execution capability, commission rates, and responsiveness. Accordingly, although Investment Manager will seek competitive rates, to the benefit of all clients, it may not necessarily obtain the lowest possible commission rates for specific client account transactions. Although the investment research products and services that may be obtained by Investment Manager will generally be used to service all of Investment Manager's clients, a brokerage commission paid by a specific

client may be used to pay for research that is not used in managing that specific client's account. Investment Manager and Fidelity are not affiliates, and no broker-dealer affiliated with Investment Manager is involved the relationship between Investment Manager and Fidelity.

### Item 13 – Review of Accounts

Reviews of an investment advisory account are triggered by the calendar year. A full review occurs every six months. Minor reviews are performed when changes in price or income occur on securities.

There is one reviewer of the portfolio. This person is either a principal or an investment advisory representative of Investment Manager. The reviewer may rely on assistance from Investment Manager's portfolio managers in an account review. The President performs reviews of all accounts. It is Investment Manager's intent to seek approximately one hundred accounts. The reviewer is instructed to monitor investment performance in relation to each client's goals and objectives. If, as a result of a review performed when changes of price or income occurred, the reviewer concludes that a change in investment is warranted, the reviewer may take the action needed to implement the change in investment.

The nature and frequency of regular reports to clients on their accounts is a quarterly portfolio analysis and review. These market valuation reports are sent separately from Customer Statements sent by a broker-dealer, which detail the account activity and the custody and safekeeping of positions for the period. For information on custody, see Item 15.

### Item 14 – Client Referrals and Other Compensation

We encourage referrals of potential clients from our existing client base, based on the presumption Investment Manager may be able to provide needed assistance with their financial affairs. No economic benefit or compensation is paid directly or indirectly to any person, for any referral of business.

### Item 15 - Custody

Investment Manager does not actually hold any securities. It is engaged in the investment advisory business and maintains regulatory compliance pursuant to the Investment Advisors Act of 1940. Investment Manager is deemed to have custody under the Investment Advisers Act of 1940 because its principal, Herbert Diamant, is a trustee of various client trust accounts.

## Item 16 – Investment Discretion

Investment Manager receives discretionary authority from the client at the outset of an advisory relationship to select the identity and amount of securities to be bought or sold. Investment discretion is part of the investment advisory contract signed by the client. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account.

When selecting securities and determining amounts, Investment Manager observes the investment policies, limitations and restrictions of the clients for which it advises. Investment guidelines and restrictions must be provided to Investment Manager in writing.

## Item 17 – Voting Client Securities

It is the policy of Investment Manager that when it exercises voting authority over client proxies, the proxies are voted in the best interests of the clients. We shall exercise the duties of care and loyalty when voting proxies. The duty of care requires us to monitor corporate events and to vote the proxies. This duty of care does not mean that failure to vote on every proxy would necessarily violate our fiduciary obligations. To satisfy its duty of loyalty, Investment Manager must cast the proxy votes in a manner consistent with the best interest of its client and must not subrogate client interests to Investment Manager's own interest. Upon receipt of a written request directly from a client, we shall provide records of proxy voting information with respect to the particular client's holdings. On receipt of a written request from a client, we shall provide a copy of our voting policies and procedures.

## Item 18 – Financial Information

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about Investment Manager's financial condition. Investment Manager has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.

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## Item 1 – Cover Page

Herbert Diamant

DIAMANT ASSET MANAGEMENT, INC.

440 Main Street  
Ridgefield, Connecticut 06877  
203-661-6410

Brochure Supplement

Dated 04/01/2024

This Brochure Supplement provides information about Herbert Diamant that supplements the Diamant Asset Management, Inc. Brochure. You should have received a copy of that Brochure. Please contact Herbert Diamant if you did not receive Diamant Asset Management, Inc.'s Brochure or if you have any questions about the contents of this supplement. Additional information about Herbert Diamant is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 – Educational Background and Business Experience

Herbert Diamant: Born 1957. Graduated from Georgetown University BSBA with Finance and Marketing dual majors, and an Economics minor. Business background: Officer and Senior Portfolio Manager of the registered investment advisory firm of Diamant Asset Management, Inc. Officer, General Securities Principal, Financial and Operations Principal, Limited Representative Equity Trader, Municipal Securities Principal, and General Securities Registered Representative of self-clearing, general securities broker/dealer firm of Diamant Investment Corporation for thirty-nine years from 1978 to 2017.

## Item 3 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this item.

## Item 4 – Other Business Activities

Herbert Diamant is solely engaged in the investment related business of Diamant Asset Management, Inc. There are no other business activities to report.

Item 5 – Additional Compensation

There are no arrangements for additional compensation or economic benefit to Herbert Diamant from any person who is not a client.

Item 6 – Supervision

Diamant Asset Management Inc. and its employees follow both a written Code of Ethics and written General Office Supervisory Procedures. These manuals provide procedures and methods to ensure the firm maintains compliance with laws, regulations, and the proper practices of an investment advisor. The Firm has purposely limited the number of employees and has maintained itself as a small company. Given its small size, one or two individuals must provide appropriate supervision, inspection, and other responsibilities which at larger firms may be provided by larger staffs. Despite its limited personnel, the Firm follows procedures to operate a regulatory compliant business.

Herbert Diamant has the experience to hold several positions at Diamant Asset Management Inc. His roles include Senior Portfolio Manager and Chief Compliance officer. The Chief Compliance Officer is responsible for monitoring the advice the supervised person provides to clients. In this case, Sheila Morgan monitors the advice of Herbert Diamant. Mr. Diamant can be reached at 203-661-6410.

The sole shareholder and owner of Diamant Asset Management Inc. is Herbert Diamant. As such, he has a vested interest in ensuring the advice rendered is in line with stated procedures. To continue the long-term client relationships he enjoys, his focus is therefore aligned with customers to make sure client investment needs continue to be met over time.

## Item 1 – Cover Page

Sheila Morgan

DIAMANT ASSET MANAGEMENT, INC.

440 Main Street  
Ridgefield, Connecticut 06877  
203-661-6410

Brochure Supplement

Dated 04/01/2024

This Brochure Supplement provides information about Sheila Morgan that supplements the Diamant Asset Management, Inc. Brochure. You should have received a copy of that Brochure. Please contact Herbert Diamant if you did not receive Diamant Asset Management, Inc.'s Brochure or if you have any questions about the contents of this supplement. Additional information about Sheila Morgan is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 – Educational Background and Business Experience

Sheila Morgan: Born 1979. Graduated from the University of Connecticut in 2004 with dual degrees in Economics and Political Science, with a minor in history. Business background: Portfolio Manager of the registered investment advisory firm of Diamant Asset Management, Inc. Financial Consultant for Charles Schwab & Co., for two years. Worked for ten years in the High Net Worth space for U.S. Trust, Bank of America Private Wealth Management, and Northern Trust Global Advisors, Inc. Held the Series 7 and 66 securities licenses. Holds the Accredited Asset Management Specialist, AAMS® designation from the College of Financial Planning.

## Item 3 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this item.

## Item 4 – Other Business Activities

Sheila Morgan is solely engaged in the investment related business of Diamant Asset Management, Inc. There are no other business activities to report.

## Item 5 – Additional Compensation

There are no arrangements for additional compensation or economic benefit to Sheila Morgan from any person who is not a client.



Item 6 – Supervision

Diamant Asset Management Inc. and its employees follow both a written Code of Ethics and written General Office Supervisory Procedures. These manuals provide procedures and methods to insure the firm maintains compliance with laws, regulations, and the proper practices of an investment advisor. The Firm has purposely limited the number of employees and has maintained itself as a small company. Given its small size, one or two individuals must provide appropriate supervision, inspection, and other responsibilities which at larger firms may be provided by larger staffs. Despite its limited personnel, the Firm follows procedures to operate a regulatory business which is compliant.

Sheila Morgan has sufficient experience in investment management to be a Portfolio Manager to clients. The Chief Compliance Officer is responsible for monitoring the advice the supervised person provides to clients. In this case, Herbert Diamant acts as Chief Compliance Officer and monitors the advice of Sheila Morgan. Mr. Diamant can be reached at 203-661-6410.