

Firm Brochure

(Part 2A of Form ADV)

SASSER INVESTMENT MANAGEMENT, INC.

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This brochure provides information about the qualifications and business practices of SASSER INVESTMENT MANAGEMENT, INC. ("SIM" or the "Company"). If you have any questions about the contents of this brochure, please contact us at: 510-835-0960, or by email at: info@sasserinvestments.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission, or by any state securities authority.

Additional information about SASSER INVESTMENT MANAGEMENT, INC. is available on the SEC's website at www.adviserinfo.sec.gov

March 30, 2024

Material Changes

Annual Update

The Material Changes section of this brochure will be updated annually when material changes occur since the previous release of the Firm Brochure.

Material Changes since the Last Update

The U.S. Securities and Exchange Commission issued a final rule in July 2010 requiring advisers to provide a Firm Brochure in narrative “plain English” format. The new final rule specifies mandatory sections and organization.

Full Brochure Available

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at: 510-835-0960 or by email at: info@sasserinvestments.com.

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Advisory Business

Firm Description

SASSER INVESTMENT MANAGEMENT, INC., (“SIM” or the “Company”) was founded in 1996.

SASSER INVESTMENT MANAGEMENT, INC. provides personalized, confidential investment advisory and management services to individuals, pension and profit-sharing plans, trusts, estates, charitable organizations and small businesses. Advice is provided through consultation with the client and may include determination of financial objectives, identification of financial problems, cash flow management, tax planning, insurance review, investment management, education funding, retirement planning, and estate planning. The financial and other pertinent data obtained from the client determines appropriate investment guidelines, risk tolerance and other factors that will assist in ascertaining the suitability of client accounts.

SASSER INVESTMENT MANAGEMENT, INC. is strictly a fee-only investment management firm. The firm does not sell annuities, insurance, stocks, bonds, mutual funds, limited partnerships, or other commissioned products. The firm is not affiliated with entities that sell financial products or securities. No commissions in any form are accepted. No finder’s fees are accepted.

SASSER INVESTMENT MANAGEMENT, INC. directly or indirectly compensates for some client referrals. Sasser Investment Management, Inc. has and may in the future enter into agreements with individuals to solicit prospective clients or refer prospective clients to its investment management services. Under the agreement, the individual may identify client candidates, initiate contact with individuals or other representatives of investment funds, introduce interested parties to the financial services offered by Sasser Investment Management, Inc. and arrange initial meetings between prospective clients.

In return for the services provided, Sasser Investment Management, Inc. may compensate individuals by paying a fixed fee or a percentage of advisory fees collected from referred clients. Clients are not charged any additional advisory fees attributable to the existence of any arrangement pursuant to which Sasser Investment Management, Inc. has agreed to compensate persons for soliciting or referring clients to the company.

Any solicitor, at the time of any solicitation activities for which compensation is paid, or to be paid by SIM, will provide the client with a current copy of SIM’s written disclosure statement required by Rule 204-3 (“brochure rule”). Solicitor will also provide to the client prior to, or at the time of, entering any written or oral investment advisory contract with such client, a signed and dated acknowledgement of receipt of SIM’s written disclosure statement and Solicitor’s written disclosure document.

SASSER INVESTMENT MANAGEMENT, INC. does not act as a custodian of client assets. The client always maintains asset control. As the investment manager, SASSER INVESTMENT MANAGEMENT, INC. places trades for clients under a limited power of attorney and may have the authority to disburse funds from client accounts following the client's instructions. Funds may only be disbursed directly to the client.

Periodic reviews are communicated to provide reminders of the specific courses of action that are taken. More frequent reviews occur but are not necessarily communicated to the client unless immediate changes are recommended.

Meetings with clients and prospective clients, which may be by telephone or video conference, are free of charge and hourly or time-based fees are never charged for financial planning or advisory services. Meetings are considered as either an exploratory interview to determine the extent to which investment management may be beneficial to the client, or to determine that existing investment advisory guidelines are appropriate for clients and their investment objectives and whether changes are required to a client's investment policies and guidelines.

Principal Owners

Bradley D. Sasser and Thomas J. Lonzo are the sole stockholders of Sasser Investment Management, Inc.

Types of Advisory Services

SASSER INVESTMENT MANAGEMENT, INC. provides investment supervisory services, also known as asset management services. The company provides asset management of client funds through diversification of portfolios utilizing domestic as well as foreign securities. Securities may include equity, fixed income and real estate investments depending on the client's stated objectives. Investments are, or may be, determined based on the client's investment objectives, risk tolerance, net worth, tax guidance, liquidity needs and other suitability factors. Accounts are managed on an individual basis and restrictions and guidelines imposed by clients affect the composition and performance of portfolios. For these reasons, performance of portfolios with the same investment objective may differ and clients should not expect the performance of their portfolio to be identical to the performance of the average client portfolio.

On an occasional basis, SASSER INVESTMENT MANAGEMENT, INC. furnishes general advice to clients on matters not involving securities, such as financial planning matters, taxation issues, and trust services that often include estate planning, however the Company does not offer financial planning services.

As of December 31, 2023, SASSER INVESTMENT MANAGEMENT, INC. manages approximately \$100 million in assets for approximately 95 clients.

Approximately \$90 million is managed on a discretionary basis, and \$10 million is managed on a non-discretionary basis.

Tailored Relationships

The goals and objectives for each client are documented in our client relationship management system. Investment policy statements are created that reflect the stated investment strategy, goals and objectives. Clients may impose restrictions on investing in certain securities or types of securities.

Agreements may not be assigned without client consent.

Types of Agreements

The following agreements define the typical client relationships.

Investment Management Agreement

Most clients choose to have SASSER INVESTMENT MANAGEMENT, INC. manage their assets in a manner designed to meet, and be consistent with, agreed upon investment goals and objectives, or to have their assets managed in a way that fits with an existing financial plan developed by a third party.

The scope of work and fee for an Investment Management Agreement is provided to the client in writing prior to the start of the relationship.

The annual Investment Management Agreement fee is based on a percentage of the investable assets according to the following schedule:

- _1.00%_ on equities, equity ETFs, cash and cash equivalents;
- _0.50%_ on fixed income securities; and
- _0.50%_ on mutual funds and other managed assets.

There is no minimum annual fee. Fees are negotiable for managed equity and cash balances above \$1,000,000. Current client relationships may exist where the fees are higher or lower than the fee schedule above.

Although the Investment Management Agreement is an ongoing agreement and adjustments or amendments to the agreement may be required from time to time, the length of service to the client is at the client's discretion. The client, or the investment manager may terminate an Agreement by written notice to the other party. At termination, fees will be billed on a pro rata basis for the portion of the quarter completed. The portfolio value on the day of termination is used as the basis for the fee computation, adjusted for the number of days during the billing quarter prior to termination.

Asset Management

Stocks, bonds and other fixed income securities are purchased or sold through a brokerage account when appropriate. The brokerage firm may charge a fee for stock and bond trades. SASSER INVESTMENT

MANAGEMENT, INC. does not receive any compensation, in any form, from fund companies.

Investments may also include: equities (stocks), warrants, corporate debt securities, commercial paper, certificates of deposit, municipal securities, investment company securities (variable life insurance, variable annuities, and mutual funds shares), U. S. government securities, options contracts, futures contracts, and interests in partnerships.

Assets may be invested in no-load or low-load mutual funds and exchange-traded funds in order to achieve adequate diversification within a specific asset class or market sector. Fund companies charge each fund shareholder an investment management fee that is disclosed in the fund prospectus. Discount brokerages may charge a transaction fee for the purchase of some funds.

Initial public offerings (IPOs) are not available through SASSER INVESTMENT MANAGEMENT, INC.

Termination of Agreement

A Client may terminate the Investment Management Agreement at any time by notifying SASSER INVESTMENT MANAGEMENT, INC. in writing. Though SIM bills clients in arrears, if the client made an advance payment, SASSER INVESTMENT MANAGEMENT, INC. will refund any unearned portion of the advance payment.

SASSER INVESTMENT MANAGEMENT, INC. may terminate any of the aforementioned agreements at any time by notifying the client in writing. If the client made an advance payment, SASSER INVESTMENT MANAGEMENT, INC. will refund any unearned portion of the advance payment.

Fees and Compensation

Description

SASSER INVESTMENT MANAGEMENT, INC. bases its fees on a percentage of assets under management. Lower fees for comparable services may be available from other sources.

Fees may be negotiable.

Fee Billing

Investment management fees are billed quarterly, in arrears, meaning that client fees are due after the three-month billing period has ended. Payment in full is expected upon invoice presentation. Fees are usually deducted from a designated client account to facilitate payment. The client must consent in advance to direct debiting of their investment account.

Other Fees

Custodians charge transaction fees on most purchases or sales of securities including certain mutual funds and exchange-traded funds. These transaction charges are usually small and incidental to the purchase or sale of a security. The selection of the security is more important than the nominal fee that the custodian charges to buy or sell the security. Sasser Investment Management, Inc. does not collect any portion of transaction fees charged by custodians.

Expense Ratios

Mutual funds and exchange traded funds generally charge a management fee for their services as investment managers. The management fee is called an expense ratio. For example, an expense ratio of 0.50 means that the mutual fund company charges 0.50% annually for their services. These fees are in addition to the fees paid by clients to SASSER INVESTMENT MANAGEMENT, INC.

Performance figures quoted by mutual fund companies in various publications are after their fees have been deducted.

Performance-Based Fees

Sharing of Capital Gains

Fees are not based on a share of the capital gains or capital appreciation of managed securities.

SASSER INVESTMENT MANAGEMENT, INC. does not use a performance-based fee structure. Performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client.

Types of Clients

Description

SASSER INVESTMENT MANAGEMENT, INC. generally provides investment management services to individuals, pension and profit-sharing plans, trusts, estates, charitable organizations, corporations or business entities.

Client relationships vary in scope and length of service.

Account Minimums

The minimum account size is \$200,000.00 of assets under management.

SIM may waive the minimum account size at its discretion. Accounts that fall below the minimum size, or are opened and managed below the minimum

size are billed on a percentage of the actual assets under management and not subject to a minimum annual fee.

Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis

Security analysis methods are focused on fundamental analysis, although technical analysis and cyclical analysis may also be part of the analysis process.

The main sources of information used in the analysis process include financial newspapers, magazines and periodicals, research materials prepared by others, corporate rating services, annual reports, prospectuses, filings with the Securities and Exchange Commission, and company press releases.

Investment Strategies

The primary investment strategies used on client accounts may include long-term purchases, short-term purchases, trading and, when approved by a client, option writing (including covered options, uncovered options or spreading strategies).

The investment strategy for a specific client is based upon the objectives stated in consultation with the client. The client may change these objectives at any time. Each client, in consultation with SIM, will develop investment policies and guidelines and document their objectives and their desired investment strategy.

Risk of Loss

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks:

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- **Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.

- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

Disciplinary Information

Legal and Disciplinary

The firm and its employees have not been involved in legal or disciplinary events related to past or present investment clients.

Other Financial Industry Activities and Affiliations

Financial Industry Activities

SASSER INVESTMENT MANAGEMENT, INC. is registered as an investment advisor with the Securities and Exchange Commission (SEC) and its principal business is to provide investment advice and management services.

Affiliations

SASSER INVESTMENT MANAGEMENT, INC. has no arrangements that are material to its advisory of its clients with a related person who is a broker-dealer, investment company, other investment advisor, financial planning firm, commodity pool operator, commodity trading adviser or futures commission

merchant, banking or thrift institution, accounting firm, law firm, insurance company or agency, pension consultant, real estate broker or dealer, or an entity that creates or packages limited partnerships.

SASSER INVESTMENT MANAGEMENT, INC. works closely with a real estate broker Stonetree Financial, Inc. to provide private real estate backed loans also known as trust deeds to clients on a non-discretionary basis. Stonetree Financial does not compensate SIM when SIM clients participate in a loan. When clients participate in a loan Stonetree will compensate Calluna Real Estate Services, LLC which is wholly owned by the owners of Sasser Investment Management. The fees paid to Calluna come from the loan origination fees (points) paid by the borrower.

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

Code of Ethics

The employees of SASSER INVESTMENT MANAGEMENT, INC. have committed to a Code of Ethics that is available for review by clients and prospective clients upon request.

In addition to SIM's Code of Ethics, the firm has adopted the CFA Institute's Code of Ethics and Standards of Professional Conduct. The CFA Institute is an international, not-for-profit organization of over 100,000 members with a mission to lead the investment profession globally by setting the highest standards of ethics, education and professional excellence.

The CFA Institute's Code of Ethics covers an investment professional's behavior concerning independence, objectivity, knowledge of the law, duties to clients, duties to employers, investment analysis and recommendations and conflicts of interest. A copy of the CFAI Code of Ethics and Standards of Professional Conduct is available upon request.

Participation or Interest in Client Transactions

SASSER INVESTMENT MANAGEMENT, INC. and its employees may buy or sell products or securities recommended to, or held, by clients. Employees may not trade their own securities ahead of client trades. Employees comply with the provisions of the SASSER INVESTMENT MANAGEMENT, INC. *Compliance Manual* that specifically addresses the manner in which employees may buy or sell securities held by clients or buy or sell securities being considered for purchase or sale for client portfolios.

Personal Trading

The Chief Compliance Officer of SASSER INVESTMENT MANAGEMENT, INC. is Bradley D. Sasser. He reviews all employee trades each quarter. Records of Mr. Sasser's, or the firm's transactions will be available for

inspection upon request. Employee personal trading reviews and specific procedures for company and employee personal trading have been established to ensure that the personal trading of employees does not affect markets, that client interests come first, and that an employee's personal trades do not benefit from the company's trading activity. Company and employee personal trading may be restricted by security and timing in order to avoid a conflict of interest with client trades and specific trades may require approval from the compliance officer or designated portfolio manager.

Brokerage Practices

Selecting Brokerage Firms

SASSER INVESTMENT MANAGEMENT, INC. does not have any affiliation with product sales firms. In general, Sasser Investment Management, Inc. will work with a broker or custodian of the client's choosing. Clients may reserve the right to direct SIM with respect to particular brokers or dealers to be utilized for portfolio trading ("Directed Brokerage"). By directing portfolio trading to particular brokers or dealers, clients may inhibit Sasser Investment Management, Inc.'s ability to negotiate commissions on behalf of the client or obtain volume discounts or best execution in some transactions. Therefore, clients with directed brokerage may pay different commission charges than clients that do not direct brokerage.

SIM may recommend that clients establish brokerage accounts with the Schwab Institutional division of Charles Schwab & Co., Inc. (Schwab), and Interactive Brokers (IAB), registered broker-dealers, members SIPC, to maintain custody of clients' assets and to effect trades for their accounts. Sasser Investment Management, Inc. is independently owned and operated and not affiliated with Schwab, or IAB. Schwab provides SIM with access to its institutional trading and custody services, which are typically not available to retail investors. These services generally are available to independent investment advisors on an unsolicited basis, at no charge to them so long as a total of at least \$10 million of the advisor's clients' assets are maintained in accounts at Schwab Institutional and is not otherwise contingent upon Advisor committing to Schwab any specific amount of business (assets in custody or trading). Schwab services include brokerage, custody, research and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

For SIM's clients' accounts maintained in its custody, Schwab generally does not charge separately for custody but are compensated by account holders through commissions or other transaction or non-transaction related fees for securities trades that settle into Schwab accounts or other services provided.

Schwab also makes available to Sasser Investment Management, Inc. other products and services that benefit SIM, but may not benefit its clients'

accounts. These include software and other technology that provide access to client account data (such as trade confirmations and account statements); facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts); provide research, pricing information and other market data; facilitate payment of Sasser Investment Management Inc.'s fees from its clients' accounts; and assist with back-office functions, recordkeeping and client reporting. Many of these services generally may be used to service all or a substantial number of Sasser Investment Management, Inc.'s accounts, including accounts not maintained at Schwab Institutional. Schwab also makes available to SIM other services intended to help it manage and further develop its business enterprise. These services may include consulting, publications, and conferences on practice management, information technology, business succession, regulatory compliance and marketing. In addition, Schwab may make available, arrange and/or pay for these types of services rendered to Sasser Investment Management, Inc. by independent third parties. Fees may be discounted or waived that would otherwise be charged for some of these services or pay all or a part of the fees of a third party providing these services to Sasser Investment Management, Inc. While as a fiduciary, SIM endeavors to act in its clients' best interests, SIM's recommendation that clients maintain their assets in accounts at Schwab may be based in part on the benefit to SIM of the availability of some of the foregoing products and services and not solely on the nature, cost or quality of the custody and brokerage services provided by brokers, which may create a potential conflict of interest.

Best Execution

SASSER INVESTMENT MANAGEMENT, INC. reviews the execution of trades at each custodian at least annually. The review is documented in the SASSER INVESTMENT MANAGEMENT, INC. *Compliance Manual*. Trading fees charged by the custodians are also reviewed on a similar timeframe. SASSER INVESTMENT MANAGEMENT, INC. does not receive any portion of trading fees.

Soft Dollars

SASSER INVESTMENT MANAGEMENT, INC. does not receive a software maintenance credit because some client assets are custodied at a particular brokerage, nor does the company participate in any soft dollar arrangements.

Order Aggregation

Sasser Investment Management, Inc. may aggregate sales and purchase orders of securities held in a client account with similar orders being made simultaneously for other accounts managed by the SIM if, in SIM's reasonable judgment, such aggregation shall result on an overall economic benefit to all accounts. In accounting for an aggregated order, price and commission shall be averaged on a per unit basis daily. Each client who

participates in an aggregated order will participate at the average share price with all transaction costs shared on a pro-rata basis.

Review of Accounts

Periodic Reviews

Accounts are reviewed at least quarterly by a portfolio manager or the Chief Investment Officer. Reviews are used to monitor a portfolio's adherence to the Company's current investment strategy, client investment guidelines, asset allocation parameters when appropriate, and portfolio position sizes. Account reviews may be performed more frequently when market conditions dictate. Portfolio holdings are continuously monitored.

Annual client reviews include investment performance reviews and may include recommended actions designed to achieve client goals and a review or update of client goals. Client reviews may be in written format or conducted by "in person" or telephone appointments.

Review Triggers

Other conditions that may trigger a review are changes in tax laws, new investment information, and changes in a client's own situation.

Regular Reports

Clients receive periodic communications on at least an annual basis. Investment management clients receive written quarterly reports that include a review of investment performance, portfolio holdings and income and expense information. Additionally, clients receive trade confirmations and account statements from their executing and custodian broker-dealer.

Client Referrals and Other Compensation

Incoming Referrals

SASSER INVESTMENT MANAGEMENT, INC. has been fortunate to receive client referrals over the years. Referrals come from current clients, estate planning attorneys, accountants, employees, personal friends of employees and other similar sources. The firm does not compensate referring parties for these referrals.

Sasser Investment Management, Inc. may enter into agreements with individuals to solicit prospective clients or refer prospective clients to its investment management services. Under the agreement, the individual may identify client candidates, initiate contact with individuals or other representatives of investment funds, introduce interested parties to the

financial services offered by SIM and arrange initial meetings between prospective clients.

All solicitors for client referrals engaged by SIM have been properly licensed or registered in accordance with current standards.

In return for the services provided, Sasser Investment Management, Inc. may compensate individuals by paying a fixed fee or a percentage of the advisory fees collected from referred clients. Clients are not charged any additional advisory fees attributable to the existence of any arrangement pursuant to which Sasser Investment Management, Inc. has agreed to compensate persons for soliciting or referring clients to the company.

Any solicitor, at the time of any solicitation activities for which compensation is paid, or to be paid by the Company, will provide the client with a current copy of a written disclosure statement required by Rule 204-3 ("brochure rule"). Solicitor will provide to the client prior to, or at the time of, entering into any written or oral investment advisory contract with such client, a signed and dated acknowledgement of receipt of Sasser Investment Management, Inc.'s written disclosure statement and Solicitor's written disclosure statement.

Referrals Out

SASSER INVESTMENT MANAGEMENT, INC. does not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

Other Compensation

Brad Sasser, as a licensed California real estate broker is compensated by loan origination fees (also known as "points") paid by borrowers to originate real estate backed loans. These real estate backed loans are funded entirely, or in part, by Sasser Investment Management, Inc. clients. Neither Mr. Sasser nor the Company have discretionary authority over whether clients will participate in a loan. Clients decide whether to any particular loan is right for them and their investment objectives.

Custody

Account Statements

All assets are held at qualified custodians, in which the custodians provide account statements directly to clients at least quarterly.

Performance Reports

Clients are urged to compare the account statements received directly from their custodians to the quarterly reports provided by SASSER INVESTMENT MANAGEMENT, INC.

Net Worth Statements

The net worth of client assets under management is reported with the quarterly performance report.

Investment Discretion

Discretionary Authority for Trading

SASSER INVESTMENT MANAGEMENT, INC. accepts discretionary authority to manage securities accounts on behalf of clients. SASSER INVESTMENT MANAGEMENT, INC. has the authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold and to negotiate the commission or mark-up charged by broker-dealers for execution of such orders.

If clients grant discretionary authority, SASSER INVESTMENT MANAGEMENT, INC. shall have full power to supervise and direct the investment of the account and make and implement investment decisions, all without prior consultation with the client in accordance with the client's stated objective and subject to limitations imposed only by the client. However, SASSER INVESTMENT MANAGEMENT, INC. consults with the client prior to each trade to obtain concurrence if a blanket trading authorization has not been given.

Discretionary trading authority facilitates placing trades in accounts on the client's behalf so that SIM may promptly implement investment policy and strategy.

Limited Power of Attorney

A limited power of attorney is a trading authorization for this purpose. Clients sign a limited power of attorney so that SIM may execute trades in a client's account.

Voting Client Securities

Proxy Votes

SASSER INVESTMENT MANAGEMENT, INC. does vote proxies on securities when authorized by the client to do so. When no authorization is granted, clients are expected to vote their own proxies.

When assistance on voting proxies is requested, SASSER INVESTMENT MANAGEMENT, INC. will provide recommendations to the Client. If a conflict of interest exists, it will be disclosed to the Client.

Financial Information

Financial Condition

SASSER INVESTMENT MANAGEMENT, INC. does not have any financial impairment that will preclude the firm from meeting contractual commitments to clients.

A balance sheet is not required to be provided because SASSER INVESTMENT MANAGEMENT, INC. does not serve as a custodian for client funds or securities and does not require prepayment of fees of more than \$500 per client, and six months or more in advance.

Business Continuity Plan

General

SASSER INVESTMENT MANAGEMENT, INC. has a Business Continuity Plan in place that provides detailed steps to mitigate and recover from the loss of office space, communications, services, or key people.

Disasters

The Business Continuity Plan covers natural disasters such as snow storms, hurricanes, earthquakes, and flooding. The Plan covers man-made disasters such as loss of electrical power, loss of water pressure, fire, bomb threat, nuclear emergency, chemical event, biological event, T-1 communications line outage, Internet outage, railway accident and aircraft accident. Electronic files are backed up daily and archived offsite.

Alternate Offices

Alternate offices are identified to support ongoing operations in the event the main office is unavailable. It is our intention to contact all clients within five days of a disaster that dictates moving our office to an alternate location.

Loss of Key Personnel

SASSER INVESTMENT MANAGEMENT, INC. has made arrangements for a smooth transition to new management in order to continue the Company's investment management services, or to facilitate the transition to a new advisor if a client so chooses, in the event of Bradley Sasser's serious disability or death.

Information Security Program

Information Security

SASSER INVESTMENT MANAGEMENT, INC. maintains an information security program to reduce the risk that your personal and confidential information may be breached.

Privacy Notice

SASSER INVESTMENT MANAGEMENT, INC. is committed to maintaining the confidentiality, integrity and security of the personal information that is entrusted to us.

The categories of nonpublic information that we collect may include information about personal finances, information about health to the extent that it is needed for the financial planning process, information about transactions between clients and third parties, and information from consumer reporting agencies, e.g., credit reports. We use this information to help clients meet personal financial goals.

With permission, we disclose limited information to attorneys, accountants, and mortgage lenders with whom an established relationship exists. Clients may opt out from our sharing information with these nonaffiliated third parties by notifying us at any time by telephone, mail, fax, email, or in person. With permission, we share a limited amount of information with a brokerage firm in order to execute securities transactions on a client's behalf.

We maintain a secure office to ensure that information is not placed at unreasonable risk. We employ a firewall barrier, secure data encryption techniques and authentication procedures in our computer environment.

We do not provide personal information to mailing list vendors or solicitors. We require strict confidentiality in our agreements with unaffiliated third parties that require access to personal information, including financial service companies, consultants, and auditors. Federal and state securities regulators may review our Company records and your personal records as permitted by law.

Personally identifiable information about you will be maintained while you are a client, and for the required period thereafter that records are required to be maintained by federal and state securities laws. After that time, information may be destroyed.

We will notify you in advance if our privacy policy is expected to change. We are required by law to deliver this *Privacy Notice* to you annually, in writing.

Brochure Supplement (Part 2B of Form ADV)

Education and Business Standards

SASSER INVESTMENT MANAGEMENT, INC. requires that advisors in its employ have either work experience or a bachelor's degree and further coursework demonstrating knowledge of investment management and securities analysis. Examples of acceptable coursework include: an MBA, a CFP®, a CFA, a ChFC, JD, CTFA, EA or CPA. Additionally, advisors must have work experience that demonstrates their aptitude for securities analysis and investment management.

Professional Certifications

Employees have earned certifications and credentials that are required to be explained in further detail.

Chartered Financial Analyst (CFA): Chartered Financial Analysts are licensed by the CFA Institute to use the CFA mark. CFA certification requirements:

- Hold a bachelor's degree from an accredited institution or have equivalent education or work experience.
 - Successful completion of all three exam levels of the CFA Program.
 - Have 48 months of acceptable professional work experience in the investment decision-making process.
 - Fulfill society requirements, which vary by society. Unless you are upgrading from affiliate membership, all societies require two sponsor statements as part of each application; these are submitted online by your sponsors.
 - Agree to adhere to and sign the Member's Agreement, a Professional Conduct Statement, and any additional documentation requested by CFA Institute.
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Bradley David Sasser, CFA

Date of birth: 1960

Educational Background:

- Indiana University
Bloomington, IN
MBA Finance, 1992
- University of California, Berkeley
Berkeley, CA
BS Business Administration, 1982

Business Experience:

- Sasser Investment Management, Inc. (1999 – present)
Oakland, CA
President
- Insight Capital Research and Management (1992 – 1999)
Walnut Creek, CA
Director of Investment Management

Thomas Joseph Lonzo

Date of birth: 1959

Educational Background:

- University of Missouri
Columbia, Mo
1979-1982

Business Experience:

- Sasser Investment Management, Inc. (2010 – present)
Oakland, CA
Managing Director
- Fisher Investments (2008 – 2010)
Woodside, CA
Investment Counselor
- Bright Trading (1998 – 2008)
Walnut Creek, CA
Trader
- Oscar Gruss & Son, Inc. (1990 – 1998)
New York, NY
- Robb Peck McCooley Clearing Corp. (1987 – 1990)
New York, NY

Requirements for State Registered Advisors

Conflicts of Interest

All material conflicts of interest under California Code of Regulations Section 260.238 (k) are disclosed regarding Sasser Investment Management, Inc., its representatives or any of its employees, which could reasonably be expected to impair the rendering of unbiased and objective advice.

Investment Professionals – Supervised persons

Bradley David Sasser, CFA

Educational experience and business background – see page 16

Disciplinary Information – Mr. Sasser has not been involved in any legal or disciplinary events involving investments or investment related businesses. Mr. Sasser has not been named in any criminal or civil actions in a domestic, foreign or military court, nor has Mr. Sasser been the subject of an administrative proceeding before the SEC.

Other Business Activities – Mr. Sasser is not actively engaged in any other investment related business.

Other Compensation – Mr. Sasser may receive additional compensation from private lenders who originate deeds of trust. Compensation comes from origination fees (commonly referred to as points) paid by a borrower.

Supervision – Mr. Sasser is an owner and president of Sasser Investment Management, Inc. and oversees all investment management functions including trading, portfolio management and research.

Other Material Events – Mr. Sasser has never been involved in an arbitration claim alleging damages of any kind, nor involved in any award or otherwise been found liable in a civil, self-regulatory organization or administrative proceeding. Mr. Sasser has not been the subject of a bankruptcy petition.

Thomas Joseph Lonzo

Educational experience and business background – see page 17

Disciplinary Information – Mr. Lonzo has not been involved in any legal or disciplinary events involving investments or investment related businesses. Mr. Lonzo has not been named in any criminal or civil actions in a domestic, foreign or military court, nor has Mr. Lonzo been the subject of an administrative proceeding before the SEC.

Other Business Activities – Mr. Lonzo is not actively engaged in any other investment related business.

Other Compensation – Mr. Lonzo may receive additional compensation from private lenders who originate deeds of trust. Compensation comes from origination fees (commonly referred to as points) paid by a borrower.

Supervision – Mr. Lonzo is an owner and director of Sasser Investment Management, Inc. and is a member of the investment committee. His management functions include oversight of client relationships and all client services.

Other Material Events – Mr. Lonzo has never been involved in an arbitration claim alleging damages of any kind, nor involved in any award or otherwise been found liable in a civil, self-regulatory organization or administrative proceeding. Mr. Lonzo has not been the subject of a bankruptcy petition.