

Part 2A

March 11, 2024

Acme Jack Investments, LLC

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This brochure provides information about the qualifications and business practices of Acme Jack Investments, LLC (“Acme”). If you have any questions about the contents of this brochure, please contact us at 330-802-3036 or via email at wjack@acmejwm.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 Acme also is available on the SEC’s website at www.adviserinfo.sec.gov. If you have any questions about the contents of this Brochure or our Supplement(s), please contact us at 330-802-3036 or wjack@acmejwm.com.

Item 2 – Material Changes

Since this is our first filing, there are no material updates.

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Item 4 – Advisory Business

Firm Profile

Acme offers investment advisory and financial planning services to individuals, high net worth individuals, trusts, estates, retirement plans, charitable organizations, and businesses.

The firm serves as a fiduciary to clients, as defined under applicable laws and regulations.

Years in Business – Date of formation: June 11, 2021.

Our registration is pending with the United States Securities and Exchange (“SEC”).

Direct Principal Owners

Acme is owned by Wellborn Jack. Presently there are no other owners.

Acme’s Advisory Services

In this section, we will describe the services we offer.

Our Services

We offer ongoing portfolio management on a discretionary basis to various types of clients, including individuals, high net worth individuals, and institutions. Acme’s comprehensive portfolio management services encompass asset management as well as providing financial planning/consulting to clients. In certain situations, we may also select other investment advisors to manage a client’s assets if appropriate. Acme may offer advice on a variety of investments, including stocks, bonds, exchange traded funds (“ETFs”), options, domestic pooled investment vehicles (*i.e.*, mutual funds or closed end funds) and alternative investments, such as hedge funds, private placements, investments in real estate, venture and post venture capital companies. An advisory account may not constitute a fully diversified or balanced portfolio that is suitable for all of a client’s assets. The client’s individual investment strategy is tailored to the client’s specific needs and may include some or all of the previously mentioned securities and financial instruments.

Each client has the opportunity to place reasonable restrictions on the types of investments to be held in client’s portfolio. However, restrictions on investments in certain securities or types

of securities may not be possible due to the level of difficulty this would entail in managing the account.

Client accounts are formally reviewed at least annually. ACME may review accounts more frequently and periodically rebalance or adjust client accounts for clients where the Firm has discretion. The Firm maintains a close working relationship with its clients in order to respond effectively to major market or economic events, or to changes in a client's investment risk tolerance and life circumstances. For additional information on review of accounts, please see Item 13.

Financial Planning

We may occasionally prepare a written financial plan for our clients when deemed appropriate. Our financial planning services may involve consultation, analysis, and recommendations in the six areas of financial planning, which include (1) financial situation; (2) income taxes; (3) insurance; (4) investments; (5) retirement planning; and (6) estate planning.

In order to determine a suitable course of action for an individual client, we will perform a review of the variables that are presented. This review may include, but would not necessarily be limited to, investment objectives, consideration of your overall financial condition, income and tax status, personal and business assets, risk profile, and other factors unique to your particular circumstances.

We will review your present financial situation and issue a written analysis and report of recommendations in accordance with your goals and objectives. This service may include an initial consultation and subsequent follow-up visits. The services provided in this regard may include but would not be limited to the following:

- Prepare a personal or family balance sheet
- Create a cash flow analysis
- Review current investments and make recommendations thereon
- Review client's life insurance coverages and create a risk analysis
- Complete a retirement analysis
- Prepare a personal or family income statement
- Review client's most recent tax returns and provide tax management advice in conjunction the client's tax advisor
- Review client's estate plan and make recommendations thereon with the client's legal counsel
- Provide education planning advice

We will assist in the coordinating and the implementation of the plan. You assume full responsibility for the implementation of the plan.

Customization of Advisory Services

In order to determine a suitable course of action for an individual client, we will perform a review of our clients' financial circumstances. Such review may include, but would not necessarily be limited to, investment objectives, consideration of a client's overall financial condition, income and tax status, personal and business assets, risk profile, and other factors unique to a client's particular circumstances.

In making investment recommendations on behalf of a client, we will rely on a risk tolerance assessment, fact finding, and time horizon assessment, which would be based on information provided by a client.

Our clients are free to impose any restrictions or other conditions with regard to how we provide our advisory services. If we agree to such restrictions and/or conditions, please be advised that restrictions and guidelines imposed by a client may affect the composition and performance of custom portfolios (as a result, performance of custom portfolios within the same investment objective may differ and a client should not expect that the performance of a custom portfolio will be identical to any other individual's portfolio performance) as well as any recommendations provided to the client.

Disclosure of Fiduciary Status to Retirement Account Investors

When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours.

Under this special rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

Wrap Fee Program Participation

Acme acts as both a wrap program sponsor and a portfolio manager.

Assets Under Management (“AUM”)

AUM (discretionary): \$ 0
AUM (non-discretionary): \$ 0
Total AUM: \$ 0
Date of AUM calculation: March 11, 2024

Item 5 – Fees and Compensation

Portfolio Management:

Our firm will charge clients a 1.00% annual fee for portfolio management. Under certain circumstances we may charge a negotiated fee based on the portfolio being managed and the scope of the relationship.

The fee charged to each client will be defined in the agreement between Acme and the client. Fees cannot exceed 1.00%.

The fees will be payable quarterly in advance. The amount of the fee will be based on the market value of the assets on the last day of the previous month. The method of charging the fee will be explained in the agreement between Acme and the client.

Financial Planning:

If we provide financial planning services to you, the fee is included in your portfolio management fee.

Additional Compensation

We, nor any of our supervised persons are party to such arrangements.

We are also not involved in any arrangements to sell insurance products.

Conflicts of Interest

The instructions in the Form ADV require us to tell you that the receipt or potential for the receipt of Additional Compensation gives our supervised persons an incentive to recommend investment products based on the Additional Compensation received, rather than on your specific needs. Neither we nor any of our supervised persons are party to any such arrangement, therefore, no conflict in this regard is present.

Client-Directed Brokerage

You can purchase investment products that we recommend through any broker-dealer or other financial institution you choose. If you choose to use a firm other than the broker-dealer(s) we may normally recommend, we may not be able to properly monitor your assets and therefore we cannot be held responsible for the success or failure of any investment products or strategies that you implement at firms other than those we recommend. In other words, our services and responsibilities will not apply to transactions you effect on your own whether through firms you choose on your own or through any broker-dealer we may recommend.

Brokerage Compensation

We are not registered as a broker-dealer and thus, we do not receive transaction-based compensation for securities-related activities.

Advisory Fee Offset

Since none of our supervised persons receive compensation other than our advisory fees as described above in Item IV.(B), this issue does not apply to us.

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

We do not charge performance-based fees. We also had no side-by-side management.

Item 7 – Types of Clients

We will generally provide our services to the following types of clients.

- Individuals
- High net worth individuals

For information on any minimum fees, minimum initial/ongoing account balances, or other conditions we may impose, please refer to Item 4.

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

Methods of Analysis

In the course of our management process and as appropriate on a case by case basis, we will employ some or all of the following methods of analysis. For a description of the risks related to each particular method of analysis, see the information following each analysis method description. A description of each key risk appears later in this section.

Charting / Technical

The terms “charting” and “technical” analysis are generally used synonymously and therefore, for the purpose of this document, we will use the term, “technical analysis.” In most cases, technical analysis involves the evaluation of historical market data such as price and volume of a particular security or investment instrument. Technical analysis often times involves the use of charts, graphs, and other tools to evaluate historical factors relating to the investment instrument and perhaps the market as a whole. The goal of technical analysis is to try to identify historical trading patterns that suggest future trading activity or price targets.

Key risk(s): Economic Risk, Financial Risk, Inflation Risk, Interest Rate Risk, Legal/Regulatory Risk, Market Risk, Operational Risk, Past Performance Risk, and Strategy Risk.

Fundamental

Fundamental analysis is generally considered the opposite approach to technical analysis. Fundamental analysis involves the attempt to identify the intrinsic value (i.e. the actual, true/real value) of an investment instrument by examining any related economic, financial, and other quantitative/qualitative factors relevant to that instrument. Fundamental analysis can take into account anything that may impact the underlying value of the instrument. Examples of such things may include large-scale economic issues such as the overall condition or current cycle of the economy, industry-specific or sector-specific conditions, etc. Other company/issuer-specific factors may also be taken into consideration such as the company's/issuer's current financial condition, management experience and capabilities, legal/regulatory matters, the overall type and volume of current and expected business, etc.

One of the goals of fundamental analysis is to attempt to derive a value that can be compared to the current market price for a particular financial instrument in hopes of determining whether the instrument is overpriced (time to sell) or underpriced (time to buy).

Key risk(s): Economic Risk, Financial Risk, Inflation Risk, and Interest Rate Risk.

Investing in securities or other investment products involves the risk of loss and you should be prepared to bear such losses.

Top Down

The macroeconomic approach is a hallmark of top-down investment analysis. It emphasizes economic, market, and industry trends before making a more granular investment decision to allocate capital to specific companies. An example of a top-down approach is an investor evaluating different company sectors and finding that financials will likely perform better than industrials. As a result, the investor decides the investment portfolio will be overweight financials and underweight industrials. They then proceed to find the best stocks in the financial sector. On the contrary, a bottom-up investor may have found that an industrial company made for a compelling investment and allocated a significant amount of capital to it even though the outlook for its broader industry was negative.

Key risk(s): Economic Risk, Financial Risk, Inflation Risk, Interest Rate Risk, Legal/Regulatory Risk, Market Risk, Operational Risk, and Strategy Risk.

Bottom Up

When making investment decisions, investors can use a bottom-up investment analysis approach or top-down approach. Bottom-up investment analysis entails analyzing individual stocks for their merits, such as valuation, management competence, pricing power, and other unique characteristics of the stock and underlying company. Bottom-up investment analysis does not focus on economic cycles or market cycles firsthand for capital allocation decisions. Instead, it aims to find the best companies and stocks regardless of the overarching economic, market, or particular industry macro trends. In essence, bottom-up investing takes more of a microeconomic—small scale economic—approach to investing rather than a large scale, national economy or global—macroeconomic—approach.

Key risk(s): Economic Risk, Financial Risk, Inflation Risk, Interest Rate Risk, Legal/Regulatory Risk, Market Risk, Operational Risk, and Strategy Risk.

Investment Strategies

In the course of our management process and as appropriate on a case by case basis, we will employ any of the following investment strategies. For a description of the risks related to each particular investment strategy, see the information following each strategy description. The codes used below relate to risks described further below in this section.

Long-Term Purchases

Long-term purchases generally involve the acquisition of an investment instrument and holding it for a period of at least one year.

Key risk(s): Capital Risk, Economic Risk, Financial Risk, Inflation Risk, Interest Rate Risk, Legal/Regulatory Risk, Liquidity Risk, Market Risk, Operational Risk, Strategy Risk.

Short-Term Purchases

Short-term purchases generally involve the acquisition of an investment instrument and holding it for a period of not more than one year.

Key risk(s): Capital Risk, Economic Risk, Financial Risk, Interest Rate Risk, Legal/Regulatory Risk, Liquidity Risk, Market Risk, Operational Risk, Strategy Risk.

Risk Disclosures

Capital Risk

Capital risk is one of the most basic, fundamental risks of investing; it is the risk that you may lose 100 percent of your money. All investments carry some form of risk and the loss of capital is generally a risk for any investment instrument.

Economic Risk

The prevailing economic environment is important to the health of all businesses. Some companies, however, are more sensitive to changes in the domestic or global economy than others. These types of companies are often referred to as cyclical businesses. Countries in which a large portion of businesses are in cyclical industries are thus also very economically sensitive and carry a higher amount of economic risk. If an investment is issued by a party located in a country that experiences wide swings from an economic standpoint or in situations where certain elements of an investment instrument are hinged on dealings in such countries, the investment instrument will generally be subject to a higher level of economic risk.

Financial Risk

Financial risk is represented by internal disruptions within an investment or the issuer of an investment that can lead to unfavorable performance of the investment. Examples of financial risk can be found in cases like Enron or many of the dot com companies that were caught up in a period of extraordinary market valuations that were not based on solid financial footings of the companies.

Interest Rate Risk

Certain investments involve the payment of a fixed or variable rate of interest to the investment holder. Once an investor has acquired or has acquired the rights to an investment that pays a particular rate (fixed or variable) of interest, changes in overall interest rates in the market will affect the value of the interest-paying investment(s) they hold. In general, changes in prevailing interest rates in the market will have an inverse relationship to the value of existing, interest paying investments. In other words, as interest rates move up, the value of an instrument paying a particular rate (fixed or variable) of interest will go down. The reverse is generally true as well.

Legal/Regulatory Risk

Certain investments or the issuers of investments may be affected by changes in state or federal laws or in the prevailing regulatory framework under which the investment instrument or its issuer is regulated. Changes in the regulatory environment or tax laws can affect the performance of certain investments or issuers of those investments and thus, can have a negative impact on the overall performance of such investments.

Liquidity Risk

Certain assets may not be readily converted into cash or may have a very limited market in which they trade. Thus, you may experience the risk that your investment or assets within your investment may not be able to be liquidated quickly, thus, extending the period of time by which you may receive the proceeds from your investment. Liquidity risk can also result in unfavorable pricing when exiting (i.e. not being able to quickly get out of an investment before the price drops significantly) a particular investment and therefore, can have a negative impact on investment returns.

Market Risk

The market value of an investment will fluctuate as a result of the occurrence of the natural economic forces of supply and demand on that investment, its particular industry or sector, or the market as a whole. Market risk may affect a single issuer, industry or sector of the economy or may affect the market as a whole. Market risk can affect any investment instrument or the underlying assets or other instruments held by or traded within that investment instrument.

Operational Risk

Operational risk can be experienced when an issuer of an investment product is unable to carry out the business it has planned to execute. Operational risk can be experienced as a result of human failure, operational inefficiencies, system failures, or the failure of other processes critical to the business operations of the issuer or counter party to the investment.

Past Performance

Charting and technical analysis are often used interchangeably. Technical analysis generally attempts to forecast an investment's future potential by analyzing its past performance and other related statistics. In particular, technical analysis often times involves an evaluation of historical pricing and volume of a particular security for the purpose of forecasting where future price and volume figures may go. As with any investment analysis method, technical analysis runs the risk of not knowing the future and thus, investors should realize that even the most diligent and thorough technical analysis cannot predict or guarantee the future performance of any particular investment instrument or issuer thereof.

Strategy Risk

There is no guarantee that the investment strategies discussed herein will work under all market conditions and each investor should evaluate his/her ability to maintain any investment he/she is considering in light of his/her own investment time horizon. Investments are subject to risk, including possible loss of principal.

Investment-Specific Risks

There is no single type of investment instrument that we predominantly recommend, however, please be mindful that all investments carry some form and degree of risk. Certain types of investments carry greater types and levels of risk than others and you should make sure that you fully understand not only the investment product itself but also the attendant risk factors associated with such products.

Item 9 – Disciplinary Information

The purpose of this section is for us to disclose to you any legal, disciplinary, or other events that you may consider material in your evaluation of our firm or the integrity of our management. We have no such events to report.

Item 10 – Other Financial Industry Activities and Affiliations

The following information will address any active or pending financial industry affiliations that you need to know about for the purpose of identifying any related conflicts of interest that you might consider material in regard to letting us handle your investment advisory needs.

Neither ACME nor any of its management person(s) is registered as a broker-dealer nor do either parties have an application pending or otherwise in process for the purpose of seeking registration as a broker-dealer. Further, none of our management persons are registered as or currently seeking registration as a registered representative of a broker-dealer.

Futures Commission Merchants, Introducing Brokers, Commodity Trading Advisors, Commodity Pool Operators

Neither ACME nor its management person is registered as a futures commission merchant, an introducing broker, a commodity trading adviser, or a commodity pool operator, nor do either parties have an application pending or otherwise in process for the purpose of seeking registration as any of these types of firms. Further, none of our management persons are registered as or currently seeking registration as associated persons of any of these types of firms.

Related Persons

The purpose of this section is to address any relationship or arrangement that is material to our advisory business or to our clients that we or any of our management person(s) may have with certain related persons of ACME presently or in the future.

How we Address the Conflict(s): First and foremost, we address this conflict by disclosing it to you in this Brochure. As a matter of general policy, we aggressively discourage activities that put your interests anywhere but first. Additionally, we have instituted a comprehensive supervisory program, detailed in our Written Supervisory Procedures (“WSPs”) that was designed to address, among other things, conflicts of interest such as the relationship between us and the Funds mentioned above. In addition, we have designated a Chief Compliance Officer, as set forth on Schedule A of our Form ADV, to be the party responsible for the overall application and oversight of our supervisory process and our WSPs. Our Chief Compliance Officer has the authority to delegate certain supervisory responsibilities to other supervised persons within our firm in order to ensure that our overall system of supervision is being carried adequately out and in a timely manner.

As we stated above, in an effort to inform you of these conflicts of interest, we have prepared this Brochure and have provided it to you, in part, for the purpose of disclosing these conflicts. You are always welcome to request a current copy of our Brochure. We are obligated to provide you a copy of this Brochure no later than the time you sign our Agreement and on an annual basis, we are required to provide you either (1) a copy of our current Brochure or (2) a set of instructions as to how you can request a copy of our current Brochure.

Use of Other Investment Advisers

From time to time, we may recommend or select other investment advisers for you. Under the SEC's new marketing rule, these sorts of arrangements are referred to as "promotor arrangements" and under such arrangement, we would be serving the role of promotor for the other investment adviser.

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

Code of Ethics

We take great pride in our commitment to serving our clients' needs and the integrity with which we conduct our business. We have developed a Code of Ethics ("Code") as a means of memorializing our vision of appropriate and professional conduct in carrying out the business of providing investment advisory services. Our Code addresses issues such as the following:

- Standards of conduct and compliance with applicable laws, rules, and regulations
- Protection of material non-public information
- The addressing of conflicts of interest
- Employee disclosure and reporting of personal securities holdings and transactions
- The firm's IPO and private placement policy
- The reporting of violations of the Code
- Educating employees about the Code
- Enforcement of the Code

Each of our representatives has been furnished with a copy of our Code and has signed their names to a written acknowledgement attesting to their understanding of the Code and acceptance of its terms. A copy of our Code is available to all current and/or prospective clients upon request.

Participation in Client Trading

We do not play any role in client trading.

Interests in Securities Purchased by Clients:

We do not recommend to clients, or buy or sell for client accounts, securities in which we or our employees and affiliates have a material financial interest

Trading Alongside Our Clients

On occasion, we may invest for our own accounts or have a financial interest in the same securities or other investments that we recommend or acquire for the accounts of our clients. Further, we may also engage in transactions that are the same as or different than transactions recommended to or made for our client's accounts. Such transactions are permitted if effected, pre-cleared and reported in compliance with our policy on personal securities transactions. Generally, personal securities transactions will not be precleared when an order for the same or a related security is pending for the account of a client. Our Designated Supervisor reviews reports of personal transactions in securities by all of our associated persons quarterly or more frequently if required.

Investment Policy

None of our associated persons may effect for himself/herself or for accounts in which he/she holds a beneficial interest, any transactions in a security which is being actively recommended to any of our clients, unless in accordance with the following procedures.

Firm Procedures

In order to implement our Investment Policy, the following procedures have been put into place.

- 1) If we are recommending that any of our clients buy any security, no associated person may purchase that security prior to a client's purchase of that security; and
- 2) If we are recommending that any of our clients sell any security, no associated person may sell that security prior to a client's sale of that security.

As an alternative to the procedures described in the preceding points, we may include our own order(s) in a batch order with other client orders that would involve average pricing for the entire batch such that we would receive the same pricing as all other clients participating in the batch.

It is the primary intent of these procedures to ensure that the best interests of our clients are always served over that of our own. Trading on our own behalf that results in our own interests being served over that of our clients could be considered a breach of our fiduciary duty and thus, is aggressively discouraged.

Item 12 – Brokerage Practices

Acme will generally recommend Fidelity Brokerage Services which clears its transaction through National Financial Services.

Research and Soft Dollar Benefits

We do not participate in soft dollar arrangements.

Brokerage for Client Referrals

We do not participate in any formal arrangements to receive client referrals from any broker-dealer.

Directed Brokerage

When instructed by a client, the Firm will direct all transactions for the client's account to a particular broker-dealer designated by the client. In these cases, the Firm may not be able to seek to obtain better prices on transactions for the client by placing trades with another brokerage firm, and the client may receive less favorable prices.

Order Batching

Transactions for the client's account generally will be effected independently, unless we decide to purchase or sell the same securities for several clients at the same or approximately the same time. We may (but are not obligated to) combine or "batch" such orders to obtain best execution or to negotiate more favorable transaction rates.

Reasoning for attempting to effect a batch order is that we may need to trade in the same security for multiple accounts at or around the same time and batching may allow us to achieve a more favorable price on average for all clients. Batching, however, doesn't guarantee the lowest possible price for execution, however, it is intended to reduce the overall volatility in execution price for a large number of orders that if not batched together, may experience

significantly different execution prices. Conversely, in the event that we do not batch a group of orders that otherwise may be a prime candidate for a batched order, the resulting cost for some clients may be higher or lower than what we might be able to achieve by processing a batched order for the benefit of those same clients.

To the extent that we elect to aggregate client orders for the purchase or sale of securities, including securities in which our associated persons may invest, we will generally do so in accordance with the parameters set forth in SEC No-Action Letter, SMC Capital, Inc. We will not receive any additional compensation or remuneration as a result of a batched order.

Item 13 – Review of Accounts

Review of client accounts.

We will review accounts with the client on an ongoing basis. We will conduct a formal annual review with the client reviewing investment objective, suitability, client risk tolerance, portfolio allocation and portfolio performance. The Designated Supervisor will review the performance and cost basis for your transactions. Your investment objectives are used to review for suitability.

Name and title of Designated Supervisor: Wellborn Jack, Managing Member. Mr. Jack will employ the procedures noted above for the client's accounts subject to ACME's investment advisory services.

Non-Periodic Account Reviews

Events that may trigger further client account reviews in addition to the standard review process may include, but would not be limited to, a notable increase in the volume of requests by the client to effect transactions in his/her accounts, where such transactions may appear to be inconsistent with the client's previously stated investment objectives. Other factors may include requests by the client to liquidate certain securities positions/contracts where such transactions may appear to be inconsistent with the client's previously stated investment objectives. Additional triggering factors could be the performance on an individual account being an outlier to the performance of accounts with similar investment objectives, and a very important trigger would be customer complaints. This last trigger would be a prime example of a trigger for an intermittent review of a client account.

Reports to Clients

Account statements will be provided no less frequently than quarterly by the custodian, not by us. Account statements will identify account positions, balances, and transaction details. Upon your request, a quarterly account appraisal (written or electronic) may be created for you as well as an annual year-end statement.

In the event we also send account statements to you in addition to those provided by the qualified custodian, you are urged to compare any account statements provided by us to those provided by the custodian.

Item 14 – Client Referrals and Other Compensation

Compensation we Receive

We do not receive any compensation for client referrals.

Compensation we Pay

Acme is not a party to any agreement to compensate other parties in this manner.

Item 15 – Custody

We engage in certain activities that result in us being deemed to have custody of certain of our client's funds and/or securities.

- Automatic fee deduction from your brokerage or other trading accounts
- Physical possession or control (even temporary) of client funds or securities
- The ability to gain access to any client funds and/or securities
- One of our related persons has custody of funds and/or securities subject to our investment advisory services

As stated previously your account statements will be provided by the qualified custodian that maintains physical possession of your accounts/assets. In the event that we also provide you information related to your accounts, you are urged to review that information compare it to the information contained on the account statements or other statements received from the qualified custodian.

Item 16 Investment Discretion

In connection with our investment advisory services, we will generally seek and obtain your authorization to carry out part of our services on a purely discretionary basis. We will memorialize your authorization of our discretionary authority in our investment advisory agreement.

If you have authorized us to do so, we will exercise discretion over the following areas.

- The specific securities to be bought or sold on the client's behalf
- The amount of securities to be bought or sold on the client's behalf
- Timing as to when such securities are to be bought or sold
- The particular broker or dealer to be used for arranging client securities transactions
- To hire and fire third party managers

We will have authority to exercise complete discretion with regard to the above named factors without restriction. If done so on a non-discretionary basis, we will make certain recommendations that must be authorized by you prior to our facilitation of any such transactions. As may be separately agreed to in writing, we will observe any other specific limitations that may be imposed by you in relation to this discretionary authority.

Item 17 – Voting Client Securities

Proxy Voting

We do not vote proxies on behalf of any securities you own.

Item 18 – Financial Information

Balance Sheet

We do not require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance. As a result, we are not required to provide our clients with a copy of our balance sheet from our most recently completed fiscal year.

Adverse Financial condition

If we have discretionary authority or custody of any of our clients' assets or if we require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance, we are required to disclose any financial condition that is reasonably likely to impair our ability to meet contractual commitments with our clients. No such conditions exist.

Bankruptcy-Related Matters

During the past ten years, Acme has not been the subject of a bankruptcy petition.

Item 19 – Requirements for State-Registered Advisers

As a federally-registered investment adviser, this section of our Brochure is not applicable to us.