

## **Firm Brochure (Part 2A of Form ADV)**

### **Item 1 – Cover Page**

Alpha Analytics Investment Group, LLC

1901 Avenue of the Stars Suite 1100

Los Angeles CA 90067

310-556-0389

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

March 26, 2024

This Brochure provides information about the qualifications and business practices of ALPHA ANALYTICS INVESTMENT GROUP, LLC [“Alpha Analytics”]. If you have any questions about the contents of this Brochure, please contact us at 310-556-0389 and/or [jmcnally@alphaanalytics.com](mailto:jmcnally@alphaanalytics.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.

Alpha Analytics 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 from which you determine whether to hire or retain an Adviser.

Additional information about Alpha Analytics also is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **Item 2 – Material Changes**

### **Summary of Material Changes**

This item discusses only the material changes that have occurred since Alpha Analytics' last update dated March 29, 2023. This brochure updates information in Item 4 regarding our assets under management. There have been no other material changes to our Form ADV.

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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 new SEC Rules, we will ensure that you receive a summary of any materials 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 Jack McNally, our Chief Compliance Officer at 310-557-8803 or [jmcnally@alphaanalytics.com](mailto:jmcnally@alphaanalytics.com). Our Brochure is also available on our web site [www.alphaanalytics.com](http://www.alphaanalytics.com), also free of charge.

Additional information about Alpha Analytics is also available via the SEC's web site <https://www.adviserinfo.sec.gov>. The SEC's web site also provides information about any persons affiliated with Alpha Analytics who are registered, or are required to be registered, as investment adviser representatives of Alpha Analytics.

### **Item 3 – Table of Contents**

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

### **Brochure Supplement(s)**

Form ADV Part 2B - Robert E. Gipson .....	17
Form ADV Part 2B - Jack McNally .....	21
Privacy Policy .....	24

#### **Item 4 – Advisory Business**

Alpha Analytics Investment Group, LLC ("Alpha Analytics") is an investment advisory firm that was founded in 1998. Our principal owner is Robert E. Gipson, CFA, JD.

Our specialization and focus is creating globally diversified investment portfolios using an asset allocation model generally with publicly traded funds. We discuss with clients their investment goals, risk tolerances and individual investment circumstances. We tailor our recommended investments to the individual needs of our client based upon our review.

Portfolios are developed in accordance with client wishes and based on their individual risk tolerance and our experience in investing. These investments may include:

1. Cash, certificates of deposit & money market funds
2. Mutual funds
3. Exchanged traded funds
4. Bonds (or fixed income securities)
5. Stocks (or equity securities)
6. Others investments as we and our clients find to be appropriate

Our clients may always impose restrictions on the types of investments to include in their portfolios. For example, a client may request that no "gold funds or emerging markets investments" be included among their investments.

Alpha Analytics manages investment portfolios both on a discretionary and on a non-discretionary basis.

As of December 31, 2023, we managed the following client assets:

\$52,409,000	on a discretionary basis
\$162,530,000	on a non-discretionary basis
\$214,939,000	Total client assets managed

#### **Disclosure required by CCR Section 260.238(k)**

We assure you that all material conflicts of interest under CCR Section 260.238(k) regarding Alpha Analytics Investment Group, LLC, its representatives or any of its employees, that could reasonably expect to impair the rendering of unbiased and objective advice, are fully disclosed.

**Wrap fee programs**

Alpha Analytics Investment Group, LLC does not participate in wrap-fee programs.

**Item 5 – Fees and Compensation**

Our fees are based upon either (1) a percentage of assets under management or (2) a negotiated fixed fee (3) or a negotiated project fee. For fees based on assets under management, the basis annual fee schedule is:

1.0% fee on the first \$1,000,000

0.5% fee on the next \$9,000,000

0.4% fee thereafter

The basic annual fee schedule for assets reviewed but not under direct management is:

0.25% fee on the first \$10,000,000

0.20% fee thereafter

We have a minimum quarterly fee of \$1,500 per quarter. Fees are charged quarterly and are based on the total market value of the assets under management on the last business day of the preceding calendar quarter. Our fees, included minimum fees, may be negotiated or waived.

Accounts initiated or terminated during a calendar quarter will be charged a prorated fee.

Our investment management fee is deducted directly from our client's account. Each client receives a quarterly invoice that displays the calculation of the fee. In addition, the amount of our fee is listed on the client's custodial account statement(s). The method of paying our fee may be negotiated.

Lower fees for comparable services may be available from other sources.

## **OTHER FEES**

Alpha Analytics' fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses that will be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, third party investment and other third parties such as fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes 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 Alpha Analytics' fee, and Alpha Analytics does not receive any portion of these commissions, fees, and costs.

Item 12 further describes the factors that Alpha Analytics considers in selecting or recommending broker-dealers for client transactions and determining the reasonableness of their compensation (e.g., commissions).

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

Alpha Analytics does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

### **Item 7 – Types of Clients**

Alpha Analytics provides portfolio management services to individuals (families), high net worth individuals (families) and trustees of trusts and corporate plans. We do not have a minimum account size requirement but do have a minimum quarterly fee (see Item 5 above).

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

**Investing in securities involves the risk of loss. Clients should be prepared to bear this risk before investing.**

### **Methods of Analysis**

Alpha Analytics uses various methods of analysis when evaluating investments including:

#### **1. Fundamental economic and industry analysis**

This type of analysis involves researching and reviewing historical economic and industry data and formulating opinions on future directions. It includes the use of charts and the examination of business and market cycles. Examples of this type of data includes (a) interest rates (b) unemployment figures and (c) trade surpluses. There are risks to this type of analysis in that the underlying data may be incorrect, biased or incomplete and that the opinions based upon that data might be wrong.

#### **2. Technical and fundamental investment analysis of mutual funds, exchange traded funds, closed end funds, stocks and bonds.**

This type of analysis involves researching and reviewing data created by third parties that analyze individual funds or securities such as stocks or bonds. It includes the use of charts and the examination of business and market cycles. There are risks to this type of analysis in that the underlying data may be incorrect, biased or incomplete and that the opinions based upon that data might be wrong.

The data that we use for analysis is derived from financial research journals, financial newspapers and newspapers, investment websites, corporate and mutual fund ratings services, filings with the Securities and Exchange Commission and company press releases and other sources.

## **Investment Strategies**

**First**, Alpha Analytics reviews with its clients their current investment portfolios, what they intend to use the portfolios for, projected inbound cash flows and outbound cash flows from the investment portfolios and other client circumstances relevant to investment portfolio policy design and construction.

**Second**, Alpha Analytics prepares an Investment Policy Statement for each client taking into account the client's unique circumstances and our expectations for capital markets. We believe that investing to a well thought out investment policy, prepared in advance, is a strategy that is superior to a strategy of reacting (or over-reacting) to the endless stream of financial news, investment products and data. Each client's investment policy maintains flexibility and may be modified to meet changing client circumstances.

**Next**, Alpha Analytics primary investment strategy is to employ an asset allocation model using globally diverse equities (stocks), fixed income (bonds) and so-called alternative investments. Examples of alternative investments include private fund holding real estate backed loans and gold.

We tend to favor publicly traded investments (as opposed to investments such as hedge funds, private real estate trusts and private limited partnerships).

Our asset allocation model begins with a top-level allocation between equities (including gold and alternative assets) and fixed income and cash. Alpha Analytics believes the research findings that this top-level asset allocation (as opposed to individual stock selection) is a primary driver of investment performance over time. This top-level allocation is significantly influenced by the client's age, risk tolerance and investment goals. For example, a younger client with an appetite for risk might have 70% of their portfolio invested in equities while an older retired client might have 30% of their portfolio invested in equities. Our strategy is then to choose investments that fit into some or all of the following asset classes:



1. Domestic US Equities (especially market sectors)
2. International Equities - Developed Markets
3. International Equities - Emerging Markets
4. Real Estate - Domestic US (including private REITs)
5. Real Estate - International
6. Commodities (such as timber and gold)
7. Oil & Gas Master Limited Partnerships (MLPs)
8. Managed Futures
9. Others

**In addition**, our strategies may include tilting the equity investments toward:

1. Small and mid-sized companies (tilting away from large companies)
2. Value oriented companies (tilting away from growth companies)

**Finally**, Alpha Analytics favors infrequent trading as well as institutional class mutual funds and exchange traded funds with:

1. low expense ratios,
2. no loads,
3. no sales charges and
4. no 12b-1 fees.

### **Material Risks of Our Investment Strategies**

Alpha Analytics generally employs investment strategies that do not involve significant or unusual risk beyond that of the general domestic and international equity markets. The following are risks associated with investments that we might recommend:

1. Emerging markets - Emerging markets are riskier than more developed markets because they tend to develop unevenly and may never fully develop. Emerging markets have lower trading volumes and less liquidity than developed markets.
2. International Equities - Changes in foreign currency exchange rates can affect the value of the investment. Foreign government laws and regulations may not protect investors to the same extent of US government laws and regulation.

3. Manager Risk - Any of the fund investments (mutual fund, exchange-traded funds, closed end funds) that we may recommend are run by a portfolio manager. There is a risk that the manager will make poor investment or operational decisions.

**Investing in securities involves the risk of loss. Clients should be prepared to bear this risk before investing.**

#### **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 Alpha Analytics or the integrity of Alpha Analytics' management. Alpha Analytics has no information applicable to this Item. There have been no criminal or civil actions against Alpha Analytics or any of its personnel. Furthermore, neither Alpha Analytics nor any of its personnel has had violations of any investment related statutes or regulations.

#### **Item 10 – Other Financial Industry Activities and Affiliations**

Robert Gipson, President of Alpha Analytics, spends a substantial part of his time on business activities other than his investment advisory activities. Mr. Gipson is a shareholder and member of the Board of Directors of Gipson Hoffman & Pancione, a law firm founded by him in 1982. As such, through his legal services, there may be a trust relationship created that results in internally referred clients.

#### **Item 11 – Code of Ethics**

Alpha Analytics has adopted the Code of Ethics and Standards of Professional Conduct recommended by the CFA Institute ([www.cfainstitute.org](http://www.cfainstitute.org)) that we believe is the premier professional organization for institutional asset managers. Below are just some of the responsibilities that we have to our clients:

1. The duty to place the interest of our clients above our own interest.
2. The duty of loyalty and to act with reasonable care and exercise prudent judgment.
3. The duty to deal fairly and objectively with all clients when providing investment analysis and making investment recommendations.
4. The duty to determine that an investment is suitable to the client's financial situation.
5. The duty to make full and fair disclosure of conflicts of interest.
6. The duty to maintain client confidentiality.

The complete CFA Ethics and Standards of Professional Conduct can be found on our website at [www.alphaanalytics.com](http://www.alphaanalytics.com). All supervised persons at Alpha Analytics must acknowledge the terms of the Code of Ethics annually, or as amended.

Alpha Analytics anticipates that, in appropriate circumstances, consistent with clients' investment objectives, it will cause accounts over which Alpha Analytics has management authority to effect, and will recommend to investment advisory clients or prospective clients, the purchase or sale of securities in which Alpha Analytics, its affiliates and/or clients, directly or indirectly, have a position of interest. Alpha Analytics' employees and persons associated with Alpha Analytics are required to follow Alpha Analytics' Code of Ethics. Subject to satisfying this policy and applicable laws, officers, directors and employees of Alpha Analytics and its affiliates may trade for their own accounts in securities that are recommended to and/or purchased for Alpha Analytics' clients.

The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of Alpha Analytics will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code certain classes of securities have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of Alpha Analytics' clients. In addition, the Code requires pre-clearance of many transactions, and restricts trading in close proximity to client trading activity. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee. Employee

trading is continually monitored under the Code of Ethics, and to reasonably prevent conflicts of interest between Alpha Analytics and its clients.

### **Item 12 – Brokerage Practices**

The broker/dealer and custodian for securities owned by clients are in the client's control. Most of our client accounts are held for custody at Charles Schwab & Co. ("Schwab") and many clients use Schwab as their broker/dealer. Alpha Analytics usually has no control over commissions or transaction fees paid by clients to their broker/custodian.

Schwab also makes available to Alpha Analytics other products and services that benefit Alpha Analytics but may not benefit its clients' accounts. Some of these other products and services assist Alpha Analytics in managing and administering clients' accounts. These include trading software, other technology, and client account data such as trade confirmations and account statements, facilitate trade execution, provide research, pricing, information and other market data, facilitate payment of Alpha Analytics' fees from its client accounts, and assist with back office support, recordkeeping and client reporting. Many of these services generally may be used to service all or a substantial number of Alpha Analytics' accounts. Alpha Analytics does not receive any soft dollars from Charles Schwab, nor is it compensated for Schwab products.

### **Item 13 – Review of Accounts**

Selected transactions in accounts are reviewed by Alpha Analytics on a daily basis. Client accounts are reviewed, at a minimum, on a calendar quarter basis or more frequently if circumstances warrant. Regular reports are provided to clients on a quarterly basis or more (less) frequently if requested by a client.

#### **Item 14 – Client Referrals and Other Compensation**

Alpha Analytics may pay referral fees to independent persons or firms (“Solicitors”) for introducing clients to us. Any Solicitor arrangement(s) we have with another party is in compliance with Rule 206(4)-3 under the Investment Advisers Act of 1940. Whenever we pay a referral fee, we require the Solicitor to provide the prospective client with a copy of this document (our Firm Brochure) and a separate disclosure statement that includes the following information:

- the Solicitor’s name and relationship with our firm;
- the fact that the Solicitor is being paid a referral fee;
- the amount of the fee; and
- whether the fee paid to us by the client will be increased above our normal fees in order to compensate the Solicitor.

As a matter of firm practice, the advisory fees paid to us by clients referred by solicitors are not increased as a result of any referral.

#### **Item 15 – Custody**

Clients should receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains client’s investment assets. Alpha Analytics urges you to carefully review such statements and compare such official custodial records to the account statements that we may provide to you. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

#### **Standing Letters of Authorization**

Alpha Analytics has been deemed to have custody as a result of some clients providing us with Standing Letters of Authorization (“SLOA(s)”) to transfer funds from their account to third parties. In such instances where we act under such a SLOA, it is our internal policy to only

initiate the withdrawal when directed by the client to a third party they designate for a designated amount and at a designated time, all of their choosing. Although having custody would typically result in us being required to have a surprise examination, a surprise examination is not required in this circumstance where we are deemed to have custody due to SLOAs as we are relying on the conditions set forth in the No-Action letter issued by the Securities and Exchange Commission on February 21, 2017. Pursuant to the conditions set forth in the No-Action Letter, Alpha Analytics confirms that in those situations (1) you provide an instruction to the qualified custodian, in writing, that includes your signature, the third party's name, and either the third party's address or the third party's account number at a custodian to which the transfer should be directed; (2) you authorize us, in writing, either on the qualified custodian's form or separately, to direct transfers to the third party either on a specified schedule or from time to time; (3) the qualified custodian performs appropriate verification of the instruction, such as a signature review or other method to verify your authorization, and the qualified custodian provides a transfer of funds notice to you promptly after each transfer; (4) you have the ability to terminate or change the instruction to the qualified custodian; (5) we have no authority or ability to designate or change the identity of the third party, the address, or any other information about the third party contained in the your instruction; (6) we maintain records showing that the third party is not a related party of Alpha Analytics or located at the same address as Alpha Analytics; and (7) the qualified custodian sends you, in writing, an initial notice confirming the instruction and an annual notice reconfirming the instruction. Nearly all of Alpha Analytics' clients currently have Charles Schwab, TD Ameritrade or Equity Trust Company serving as their qualified account custodian.

Alpha Analytics does not have physical custody over client assets. However, according to Rule 206(4)-2 under the Investment Advisors Act of 1940, Alpha Analytics is deemed to have custody of client assets, and therefore must comply with the rule, when it holds, "directly or indirectly, client funds or securities or [has] any authority to obtain possession of them."

Because Alpha Analytics has the authority to deduct fees from client accounts (*see Fees and Compensation*) at their qualified custodian, we have custody of client assets in those instances. In reliance of a "no-action" letter released by the SEC on February 21, 2017, Alpha Analytics is

not required to obtain a surprise examination if the only reason we have custody is to deduct advisory fees and we comply with the conditions for “no-action” relief. Alpha Analytics intends to use the safeguards provided in regulation, instead of the requirements for custody, in instances where we have custody solely because we deduct advisory fees directly from clients’ accounts. These client accounts are not subject to the annual surprise audit by an independent accountant or required to be calculated in Item 9 in Form ADV.

We urge all of our clients to review the account statements from their qualified custodian promptly when received. We also urge clients to compare the custodian’s account statements to any performance reports they receive from us.

We urge all of our clients to review the account statements from the qualified custodian promptly when they receive them. We also urge our clients to compare the custodian’s account statements to the quarterly performance reports that they receive from us.

#### **Item 16 – Investment Discretion**

Alpha Analytics may receive 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. 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, Alpha Analytics observes the investment policies, limitations and restrictions of the clients for which it advises.

Investment guidelines and restrictions must be provided to Alpha Analytics in writing.

### **Item 17 – Voting Client Securities**

As a matter of firm policy and practice, Alpha Analytics does not have any authority to and does not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. At a client's specific request, Alpha Analytics may provide advice to clients regarding the clients' voting of proxies.

### **Item 18 – Financial Information**

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about Alpha Analytics financial condition. Alpha Analytics 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 at any time during the past ten years.

#### **Other Business Activities**

Robert Gipson engages in other business activities besides providing investment advice. We discuss these activities under Other Financial Industry Activities and Affiliations, above.

#### **Performance Based Fees**

Alpha Analytics does not receive any performance-based fees.

#### **Legal and Disciplinary Issues**

Alpha Analytics and our employees seek to maintain the highest level of business professionalism, integrity, and ethics. Alpha Analytics and its employees do not have any legal or disciplinary events to disclose.

#### **Arrangements with Securities Issuers**

Alpha Analytics and our employees have no relationships or arrangements with issuers of securities.



## **Form ADV, Part 2B: Brochure Supplement**

### **Item 1- Cover Page**

Supervised Person: Robert Gipson

Alpha Analytics Investment Group, LLC

1901 Avenue of the Stars #1100  
Los Angeles CA 90067  
310-556-0389

**This Brochure Supplement provides information about Robert Gipson that supplements the Alpha Analytics Investment Group, LLC Brochure. You should have received a copy of that Brochure. Please contact Jack McNally if you did not receive Alpha Analytics Investment Group, LLC's Brochure or if you have any questions about the contents of this supplement.**

**Additional information about Robert Gipson is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

## **Item 2- Educational Background and Business Experience**

Name: Robert Gipson

Birth Date: August 31, 1946

Education: B.A. Harvard University, 1967  
J.D. Yale University, 1973

Professional Designation: CFA - Chartered Financial Analyst

Business Background: Robert Gipson is the President and Chief Investment Officer of Alpha Analytics Investment Group, LLC. (1998 to present)

Robert Gipson is the President of Gipson, Inc., a legal service firm. (1997 to present). He is a shareholder and member of the Board of Directors of Gipson, Hoffman and Pancione, a legal services firm. He has been a member of the firm since its 1982 founding.

Robert Gipson is a Director of Wolfgang Puck Worldwide. (2013 to present)

Robert Gipson was a Director of First California Financial Group, Inc., the holding company for First California Bank. (2007 to 2013)

Robert Gipson was a Board Member of the Board of Overseers of the Claremont University Consortium, a non-for-profit educational support organization. (2002 to 2015)

Robert Gipson is President of Corporate Management Group, Inc (1989 to present) and Manager of Corporate Management Group II, LLC (2018 to present), both business consulting and bookkeeping firms.

## **Item 3- Disciplinary Information**

Robert Gipson has no disciplinary information to report.

#### **Item 4- Other Business Activities**

Robert Gipson is a shareholder and member of the Board of Directors of Gipson, Hoffman and Pancione, a law firm founded by him in December of 1982. It is non-investment related and located at 1901 Ave. of the Stars #1100, Los Angeles CA 90067. Duties include providing legal services to clients and hours devoted to this business are 100 per month, approximately 65% of which occur during securities trading hours.

Since 2007, Robert Gipson has been a Director of Wolfgang Puck Worldwide, Inc., non-investment related and located at 100 N. Crescent Dr. #100, Beverly Hills, CA 91210. Duties are corporate governance and hours devoted to this business are approximately 20 per month, approximately 50% of which occur during securities trading hours.

Since September 1989, Robert Gipson has been President of Corporate Management Group, Inc., a business consulting and bookkeeping firm, non-investment related and located at 1901 Ave. of the Stars, #1100, Los Angeles, CA 90067. Duties are executive and hours devoted to this business is approximately 2 per month, approximately 50% may occur during securities trading hours.

Since January 2018, Robert Gipson has been Manager of Corporate Management Group II, LLC., a business consulting and bookkeeping firm, non-investment related and located at 1901 Ave. of the Stars, #1100, Los Angeles, CA 90067. Duties are executive and hours devoted to this business is approximately 1 per month, approximately 50% may occur during securities trading hours.

#### **Item 5- Additional Compensation**

Robert Gipson has no conflicts of interest and receives no other forms of additional compensation from any recommendation.

### **Item 6 - Supervision**

Robert Gipson is supervised as to compliance matters by Jack McNally, Chief Compliance Officer of Alpha Analytics Investment Group, LLC. Mr. McNally also reviews all client trading matters and recommendations.

Jack McNally's contact information: Phone: 310-557-8803

E-mail: [jmcnally@alphaanalytics.com](mailto:jmcnally@alphaanalytics.com).

## **Form ADV, Part 2B: Brochure Supplement**

### **Item 1- Cover Page**

Supervised Person: Jack McNally

Alpha Analytics Investment Group, LLC

1901 Avenue of the Stars #1100  
Los Angeles CA 90067

310-556-0389

**This Brochure Supplement provides information about Jack McNally that supplements the Alpha Analytics Investment Group, LLC Brochure. You should have received a copy of that Brochure. Please contact Jack McNally if you did not receive Alpha Analytics Investment Group, LLC's Brochure or if you have any questions about the contents of this supplement.**

**Additional information about Jack McNally is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

## **Item 2- Educational Background and Business Experience**

Name: Jack McNally

Birth Date: May 13, 1955

Education: A.A. Pasadena City College, Business, 1977  
B.S. University of Southern California, Accounting 1979

Securities License: Series 65

Business Background: Jack McNally is the Senior Vice President and Chief Compliance Officer of Alpha Analytics Investment Group, LLC. (1998 to present)

Jack McNally is the Vice President of Corporate Management Group, Inc., a financial consulting and bookkeeping firm (1989 to present)

## **Item 3- Disciplinary Information**

Jack McNally has no disciplinary information to report.

## **Item 4- Other Business Activities**

Since September, 1989, Jack McNally has been Vice President of Corporate Management Group, Inc. and Corporate Management Group II, LLC, both consulting and bookkeeping firms located at 1901 Ave. of the Stars, Suite 1100, Los Angeles, CA 90067. His duties are supervisory and review and hours devoted to these businesses are less than 20 hours per month, approximately 50% of which are outside securities trading hours.

## **Item 5- Additional Compensation**

Jack McNally has no conflicts of interest and receives no other forms of additional compensation from any recommendation.

### **Item 6 - Supervision**

Jack McNally is supervised by Robert Gipson, President and Chief Investment Officer of Alpha Analytics Investment Group, LLC. The supervision occurs through the quarterly review of client accounts, frequent office and remote communications and by reviewing client trade recommendations. Robert Gipson's contact information:

Phone: 310-556-4660, E-mail: [rgipson@ghplaw.com](mailto:rgipson@ghplaw.com)

## Alpha Analytics Privacy Policy

We at Alpha Analytics Investment Group, LLC ("Alpha") are committed to safeguarding the personal information of our customers. This notice will help you understand how we safeguard and use the information we collect.

**Why and How We Collect Personal Information:** We collect information that assists us in servicing your financial needs. This information helps us provide you with a high standard of customer service, process your transactions, provide products that may interest you and fulfill legal and regulatory requirements. The personal information we collect includes information collected on applications and related forms such as, name, address, social security number, bank reference, annual income and net worth.

**How We Protect Information:** Our employees maintain and protect the confidentiality of your personal information by utilizing physical, electronic and procedural safeguards.

**Disclosure of Information:** Because we are an independent investment adviser, we have no affiliates or related organizations with which we share information.

**Non-affiliated third parties** – We may disclose any personal information to non-affiliated third parties when we believe it necessary for the conduct of our business, or where law requires disclosure. For example, personal information may be disclosed for audits, to attorneys or other professionals, or to law enforcement and regulatory agencies as necessary to protect our property or rights. In addition, we may disclose personal information to third party service providers such as mutual fund companies and clearing firms to enable them to provide business services for us by performing computer related or data maintenance or processing services, to facilitate the processing of transactions requested by you, and to assist in offering products and services. Except in those specific, limited situations, without your consent, we will not make any disclosures of your personal information to other companies who may want to sell their products or services to you. For example, we do not sell customer lists and we will not sell your name to a catalogue company or any marketing agencies.

**Former Customers:** This policy applies to former customers as well as current customers.

**Maintaining Accurate Information:** We strive to maintain complete and accurate information on you and your accounts. We will give you reasonable access to the information we have about you. If you have a question or concern about your personal information or this privacy notice, please contact us.

**Contractual commitments from vendors.** Alpha may hire firms, such as data processors, that assist Alpha in delivering services to clients. These firms contractually commit to protecting the privacy of any Alpha client information that they review or handle.

**A corporate policy for employees.** Alpha employees understand that they must maintain the integrity of personal and financial information that they come across when communicating with clients and processing transaction requests. We restrict access to nonpublic personal information about you to personnel who are necessary or appropriate to provide products or services to you. They are required to refrain from disclosing any confidential information or materials to unauthorized persons.

**Contact us with questions.** Anyone who has questions about this policy can e-mail or call the Alpha customer service information line at (310) 556-0389 during regular business hours.

**Further Information:** We reserve the right to change this Privacy Policy. The examples contained in this Privacy Policy are illustrations and they are not intended to be exclusive. This notice complies with Federal law and SEC regulations regarding privacy.