

ITEM 1: COVER PAGE

PART 2A OF FORM ADV FIRM BROCHURE



AUSTIN ATLANTIC ASSET MANAGEMENT INC.

March 22, 2024

CRD# 110035

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This brochure provides information about the qualifications and business practices of Austin Atlantic Asset Management Co. If you have any questions about the contents of this brochure, please contact us at (800) 327-6190. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority. Registration with the SEC does not imply any particular level of skill or training. Additional information about Austin Atlantic Assets Management Co. is available on the SEC's website at www.adviserinfo.sec.gov.

ITEM 2: Material Changes

Our brochure has been revised since our last annual update of our Form ADV, Part 2A (“brochure”), dated March 2024.

Changes that may be considered material are as follows:

- AAAMCO is now registered with the State of Florida as a Registered Investment Advisor
- AAAMCO is no longer the Portfolio Manager for AMF Large Cap Equity Fund; S2, the former sub-advisor of the fund, was named PM as of February 29, 2024.
- The AAAMCO Ultra Short Finance Fund as closed as of July 2023
- AAAMCO has named Rodger D. Shay, Jr. as President

Our brochure may be requested by contacting us at (800) 327-6190. We may update this brochure at any time.

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ITEM 4: Advisory Business

Austin Atlantic Asset Management Co. (“AAAMCO” or the “Firm”) is a wholly owned subsidiary of Austin Atlantic Inc., a closely held corporation majority-owned by Rodger D. Shay, Jr. The Firm was formed in 1981. As of December 31, 2023, the Firm managed \$ 48,319,000 in assets on a discretionary and \$0 on a non-discretionary basis.

Mutual Fund Services

AAAMCO does not provide discretionary advisory services to Asset Management Fund Trust Funds (“AMF”) and as of March 1, 2024, does not offer mutual funds services.

Consulting Services.

AAAMCO also provides ad hoc credit analysis, consulting and investment accounting services for repurchase agreements and securities investing to institutional clients on a non-discretionary basis.

Other Business- Separate Accounts

AAAMCO may provide separate account investment management for all for its’ investment services. Services provided can be performed on a discretionary or non-discretionary basis.

The firm’s allocation policy provides for equitable distribution between all investment strategies with common investment guidelines.

ITEM 5: Fees and Compensation

Consulting Clients

AAAMCO provides credit analysis, consulting and investment accounting services to institutional clients on a contractual basis. Consulting services generally are provided with respect to mortgage-related securities, repurchase agreements, and cash investing strategies. In addition to AAAMCO’s consulting fees, clients will generally be responsible for ancillary fees to provide such services, such as custody fees, brokerage and other transaction costs. AAAMCO’s consulting fee for clients is generally 0.05% - 0.10% of assets invested, although these fees are generally negotiated on a case-by-case basis. Solicitors for this service are generally paid 20% - 40% of the consulting fee.

Cash Management Clients

AAAMCO does not offer Cash Management to clients at this time.

ITEM 6: Performance---Based Fees and Side---by---Side Management

AAAMCO does not receive performance-based fees for any of its investment advisory services.

Item7: Types of Clients

AAAMCO generally provides investment advice to institutional investors, including banks, thrift institutions, credit unions, investment companies, family offices, endowments, insurance companies, and pension plan sponsors. With respect to non-investment company accounts, AAAMCO generally imposes a \$25 million-dollar account or investment strategy minimum for the provision of investment supervisory services. The account minimum is a general guideline and may vary depending on style considerations at the sole discretion of AAAMCO.

ITEM 8: Methods of Analysis, Investment Strategies and Risk of Loss

AAAMCO's fixed income securities analysis methods include fundamental analysis as well as quantitative and computational models to analyze investment relative value and risk.

The material risks set forth below are qualified in their entirety by the more detailed risk disclosure in the applicable product's offering materials.

Fixed-Income Investment Strategy

The Firm's fixed income strategies generally seek to minimize capital risk by focusing on short duration investment products and services. The Firm emphasizes U.S. government, mortgage-related securities, and other highly rated fixed income securities repurchase agreements collateralized by these securities.

The material risks involved in the fixed-income investment strategies include but are not limited to:

Market Risk – Market prices of securities held by a client may fall rapidly or unpredictably due to a variety of factors, including changing economic, political or market conditions.

Interest Rate Risk – Generally, the market value of fixed-income securities moves inversely with interest rate movements. In other words, if interest rates rise, the prices of fixed-income securities tend to decline. If interest rates decline, the prices of fixed-income securities tend to increase. This inverse relationship may cause the net asset value of fixed income funds to decline/rise when interest rates rise/fall.

Credit Risk – Fixed-income securities carry the risk of default, which means that the issuer is unable to make additional income and principal payments. Currently, none of our fixed income mutual funds may own non-government backed securities, thereby limiting potential losses to the premium above par. However, counterparties that provide transactional services to the fund, such as broker-dealers, and counterparties to whom the funds may provide repurchase agreement financings, do carry credit risk. The Credit Committee of the Firm provides a review and approval process for all such counterparties.

Call and Prepayment Risk – Some fixed-income securities include a provision that allows the issuer to call, or repay, the outstanding debt early. Residential mortgages, which back the securities held by the funds, are a form of debt that can be called and prepaid by the mortgagor before the stated maturity. If interest rates drop low enough, the issuer of the fixed-income security and/or mortgagor can save money by repaying its callable debt and issuing new debt at lower interest rates. Improving borrower credit, or rising home prices, may also lead to faster prepayments. In these situations, your interest payments cease, and principal may be paid early.

Securities values at a premium to par will experience a capital loss when prepayments increase. The re-investment of proceeds into newly issued fixed-income securities may include a lower coupon rate, more consistent with prevailing interest rates. This will lower monthly interest payments.

Liquidity Risk – Regulatory changes since 2008 have reduced the liquidity in the secondary, over the-counter markets for many forms of fixed income securities, including mortgage-backed securities. These manifests itself in wider bid-ask spreads for trading securities, which may increase trading costs.

Repurchase Agreement Risk - Repurchase agreements expose the Fund to the risk that the counterparty to the Fund defaults on its obligation to repurchase the underlying instruments collateralizing the repurchase agreement or is unable to provide additional eligible securities as margin when required by the Fund. In this circumstance, the Fund could lose money if it cannot sell the underlying instruments above the purchase price

Valuation - The Fund will obtain third party market valuations for all securities owned by the Fund or used as collateral in repurchase agreements. Fair value pricing, if used, is inherently a process of estimates and judgments. Fair value prices established by the Fund may fluctuate to a greater degree than securities for which market quotes are readily available and may differ materially from the value that might be realized upon the sale of the security. There can be no assurance that the Fund could purchase or sell a portfolio of investments at the market or fair value price used to calculate the Fund's net asset value, or that the market or fair value price used to value the collateral held in a repurchase agreement represents the price at which the collateral can be liquidated.

ITEM 9: Disciplinary Information

There are no legal or disciplinary events that are material to the evaluation of our advisory business or the integrity of our management.

ITEM 10: Other Financial Industry Activities and Affiliations

AAAMCO is under common control with a registered broker-dealer, Austin Atlantic Capital Inc. (“AACI”). AACI is the distributor of the AMF funds managed by S2 and shares of the Fund are sold primarily to clients of S2, which consist of institutional clients including banking and financial institutions. The majority owners of AAAMCO also own and control a national savings bank, Anthem Bank & Trust (“Anthem”). Anthem does not serve as custodian to AAAMCO’s advisory business.

Rodger D. Shay, Jr. the firm’s President, is associated with Austin Atlantic Capital Inc. as a Registered Representative qualified by Series 7, 63, and 24. We do not believe this represents a conflict of interest because Mr. Shay performs certain operations related management tasks and is qualified to meet with institutional investors as he is actively registered to consult on investments.

Kevin A. Rowe, the firm’s Chief Compliance Officer, serves as an outsourced Compliance Officer. We do not believe that the relationship creates a conflict with AAAMCO because Rowe is neither a control person or manages investments with any FINRA registered Broker-Dealers or State or SEC Registered Investment Advisors. Mr. Rowe is founder and President of LibScor Associates, Inc., which provides Compliance, Anti-Money Laundering, and Financial Operations consulting services.

AAAMCO is not registered with the U.S. Commodity Futures Trading Commission or National Futures Association.

ITEM 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

AAAMCO has adopted a Code of Ethics in accordance with Rule 204A-1 under the Investment Advisors Act of 1940, as amended, and Rule 17j-1 under the Investment Company Act of 1940, as amended. The Code of Ethics sets forth standards of business conduct applicable to AAAMCO’s supervised persons and requires the reporting and review of personal securities transactions of access persons.

AAAMCO’s Code of Ethics includes various reporting and pre-approval requirements and certain trading restrictions in order to prevent actual or potential conflicts of interest with transactions recommended to clients. The Code of Ethics applies not only to transactions by the individual, but also to transactions for accounts in which such person has a beneficial interest. Compliance with the Code of Ethics is a condition of employment. In addition, AAAMCO has adopted certain policies and procedures concerning the misuse of material non-public information that are designed to prevent insider trading by employees of the Firm. A copy of the Code will be made available to any client or prospective client upon request by calling AAAMCO’s Chief Compliance Officer at (305) 507-1536.

AACI or its representatives may refer its broker-dealer clients to AAAMCO for advisory services. Likewise, AAAMCO may recommend the services of AACI to its’ clients for whom it provides

services. Consulting and administrative services do not include investment supervisory services and AAAMCO does not have investment discretion or trading authority over referrals, who may request services offered that generates referral fees to AACI. AAAMCO does not affect transactions for its own account.

ITEM 12: Brokerage Practices

Best Execution and Trade Allocation

In placing orders, AAAMCO generally seeks to obtain the best combination of price and trading services and uses its best judgment in allocating transactions. In selecting broker-dealers to effect securities transactions for clients, AAAMCO selects broker-dealers that it believes are financially responsible, will effectively and efficiently execute, report, clear and settle the order, provide valuable research, timely and accurately communicate with AAAMCO's trading desk and operations team and will charge commission rates which, when combined with these services, will produce the most favorable total cost or proceeds for each transaction under these circumstances.

Competitive spreads and commissions are significant considerations in placing transactions with broker-dealers. However, this does not mean that execution decisions must be based solely on whether the lowest possible price or commission costs may be obtained. Best execution means the best overall qualitative execution, not necessarily the lowest possible commission cost.

Fixed-income securities are usually purchased directly from the issuer, from an underwriter or from a dealer that makes a market in such securities. Purchases from dealers serving as market makers may include the spread between the bid and asked prices. Usually, there is no brokerage commission paid in such transactions. The primary considerations are availability and prompt execution of orders in an effective manner at the best price.

AAAMCO's investment services in the financing markets require the development of contractual relationships with counterparties that involve substantial time and legal/regulatory work to execute. The financing markets are also substantially less transparent and centrally organized than the markets for buying and selling fixed income securities. Therefore, while AAAMCO seeks to engage in financing transactions that generate the most attractive risk-adjusted returns for its investors, there is no assurance that AAAMCO will always be able to source and identify all potential borrowers that would be applicable for our financing services.

With respect to equity securities, the primary aim in the allocation of portfolio transactions is the attainment of the best combination of price and efficient service. Given the limited amount of AAAMCO's trading volume and focus on large cap, liquid, and exchange-traded securities, we believe that consistently using only one or two dealers to execute transactions provides the best combination of efficient transactions and low-cost commissions. We regularly compare our execution levels and commission rates with to affirm the efficacy of this policy. Portfolio transactions in unlisted securities are executed in the over-the-counter market through principal market makers.

When securities are purchased, the portfolio management team allocates the securities based on the investment requirements and objectives of each fund and/or separately management account that is

eligible to purchase the security. These requirements and objectives include relative cash available to invest, the risk posture of each fund relative to its stated and/or targeted levels, and the portfolio management team's expectation concerning future liquidity needs of each fund as well as other variables.

Brokerage Selection, Research and Other Soft Dollar Benefits

AAAMCO may direct brokerage commissions on client account portfolio transactions to certain broker-dealers consistent with Section 28(e) of the Securities Exchange Act of 1934, in recognition of the value of efficient execution and research and statistical information provided by the selected broker-dealer and/or other third-party providers.

As a general matter, the research and statistical information provided may consist of written reports and presentations analyzing specific companies, analytical and quantitative tools, industry sectors, the financial markets and the economy. Such information may also include reports accessed by computers or terminals, statistical collations and appraisals. The research provided can be either proprietary (created and provided by the broker-dealer, including tangible research products as well as, for example, access to company management or broker/dealer generated research reports) or third-party (created by the third-party, but provided by the broker-dealers). This may cause clients to pay a broker-dealer a commission rate higher than that which the broker-dealer would have charged for execution only. This is known as paying up for soft dollar benefits. These products and services may include advice, either directly or through publications or writings, as to the value of securities, the advisability of investing in, purchasing, or selling securities, and the availability of securities or purchasers or sellers of securities, and analyses and reports concerning issuers, industries, securities, economic factors and trends, portfolio strategy, and the performance of accounts.

In the allocation of brokerage business, AAAMCO may have an incentive to give preference to those brokers that provide research products and services, either directly or indirectly. However, AAAMCO will only do so to the extent the Firm believes that the selection of a particular broker is not inconsistent with its duty to seek best execution. To the extent that AAAMCO is able to obtain products and services through the use of clients' commission dollars, it reduces the need to produce the same research internally or through outside providers for hard dollars and thus provides an economic benefit to AAAMCO. On an ongoing basis, AAAMCO monitors the research services received to ensure that the services received are reasonable in relation to the brokerage allocated.

If AAAMCO receives a product or service that both aids it in carrying out its investment decision making responsibilities (i.e., a "research use") and provides non-research related uses, AAAMCO will make a good faith determination as to the allocation of the cost of these "mixed-use items" between the research and non-research uses and will only use soft dollars to pay for the portion of the cost related to its research use.

The research products/services provided by brokers through its soft dollar arrangements benefit AAAMCO's investment process for client accounts and are used in formulating investment advice for clients of the Firm including accounts other than those that paid commissions to the brokers on a particular transaction. As a result, not all research generated by a client's trade will benefit that particular client's account. In some instances, the other accounts benefited will include accounts that clients have directed a portion of their brokerage commissions to go to particular brokers other than those providing the research products/services. AAAMCO does not attempt to allocate the relative

costs or benefits of research among client accounts because it believes that, in the aggregate, the research it receives benefits clients and assists AAAMCO in fulfilling its overall duty to its clients.

Last fiscal year, AAAMCO did not engage in any transactions tied to third party soft dollar arrangements.

Brokerage for Client Referrals

In selecting broker-dealers, AAAMCO does not consider whether it receives client referrals from a broker-dealer or third-party firms.

Aggregation of Client Orders

Certain investments recommended for an investment company or separately managed account client by AAAMCO may also be appropriate for other clients. Investment decisions are made by AAAMCO on the basis of the investment objectives and needs of the particular client. If transactions are affected for two or more client's investment company or other clients on the same day, such transactions will be allocated between or among the clients in a manner that AAAMCO deems fair and equitable and, to the extent appropriate, will be aggregated.

ITEM 13: Review of Accounts

The assigned portfolio manager reviews discretionary accounts on a periodic basis with primary responsibility for that account. The form and frequency of reporting is determined on a case-by-case basis in consultation with the client.

ITEM 14: Client Referrals and Other Compensation

AAAMCO utilizes solicitors who maybe employees and/or contractors of AACI. These solicitors may be compensated through salaries, bonuses, commissions or a flat fee.

AAAMCO may pay cash referral fees to unaffiliated third parties. In such instances, the referral agreement and the related activities of AAAMCO will be in compliance with Rule 206(4)-3 under the Investment Advisers Act of 1940, which specifies certain standards that must be met by an investment adviser and any person who solicits any client for, or refers any client to, an investment adviser prior to the payment of a cash fee, directly or indirectly, for client solicitation or referral.

ITEM 15: Custody

AAAMCO does not maintain custody of client funds or securities.

ITEM 16: Investment Discretion

Mutual Fund Services- AAAMCO may accept discretionary authority to manage securities accounts on behalf of investment company clients pursuant to an investment advisory agreement. AAAMCO may purchase for the portfolios of its investment company clients only securities permitted by the investment policies applicable to a particular portfolio.

Consulting Services- AAAMCO does not have investment discretion when it provides consulting services.

ITEM 17: Voting Client Securities

AAAMCO has the authority to vote proxies for client fixed income securities. S2 has the authority to vote proxies for client equity securities. The following is a summary of AAACMO 's and S2's proxy voting policy and procedures. Clients wishing to receive a copy of the entire policies and procedures or information on how AAAMCO and S2 voted securities in their account should contact AAAMCO 's Compliance Department at (305) 507-1536.

It is the policy of AAAMCO and S2 to vote proxies for client securities in the manner most economically beneficial to the client. In general, AAAMCO and S2 will vote against anti-takeover provisions and other actions by management that has the effect of diluting shareholders' interests (both economic and voting). AAAMCO and S2 will vote in favor of dilutive provisions if it deems that such provisions are nonetheless in the best interest the stockholders, such as when the provisions improve the shareholders' negotiating positions with potential acquirers.

With respect to situations that pose a potential conflict of interest, AAAMCO's Executive Committee will determine the vote.

ITEM 18: Financial Information

AAAMCO does not believe there is any financial condition that is reasonably likely to impair its ability to meet contractual commitments to clients.

ITEM 19: REQUIREMENTS FOR STATE REGISTERED INVESTMENT ADVISERS

Principal Executive Officers and Management Persons

Rodger D. Shay, JR
Born in

Business Background

- 08/2023 to Present Austin Atlantic Asset Management Co. President Coral Gables, FL

- 03/2008 to Present Austin Atlantic Inc. President Coral Gables, FL
- 08/1997- 03/2024 Austin Atlantic Asset Management Co. Executive Vice President Coral Gables, FL
- 08/1997 to Present Austin Atlantic Capital Inc. President Coral Gables, FL

Performance Based Fees

The amount of the performance-based fee we charge is described in the “Fees and Compensation - ITEM 5” section in this Brochure.

Performance based fee arrangements may create an incentive for AAAMCO to recommend investments, which may be riskier or more speculative than those, which would be recommended under a different fee arrangement.

Disciplinary Information

The firm's President has not been involved in any material, reportable, disciplinary events.

Other Relationships or Arrangements with Issuers of Securities

Our firm and our related persons do not have any relationships or arrangements with any issuer of securities.

Class Action Lawsuits

From time to time, securities held in the accounts of Clients will be the subject of class action lawsuits. AAAMCO has no obligation to determine if securities held by the Client are subject to a pending or resolved class action lawsuit. It also has no duty to evaluate a Client's eligibility or to submit a claim to participate in the proceeds of a securities class action settlement or verdict. Furthermore, the firm has no obligation or responsibility to initiate litigation to recover damages on behalf of Clients who may have been injured as a result of actions, misconduct, or negligence by corporate management of issuers whose securities are held by Clients.

Where the firm receives written or electronic notice of a class action lawsuit, settlement, or verdict affecting securities owned by a Client, it will forward all notices, proof of claim forms, and other materials, to the Client. Electronic mail is acceptable where appropriate, and the Client has authorized contact in this manner.

Confidentiality

AAAMCO's views protecting its customers' private information as a top priority and, pursuant to the requirements of the Gramm-Leach-Bliley Act, the firm has instituted policies and procedures to ensure that customer information is kept private and secure.

AAAMCO does not disclose any nonpublic personal information about its customers or former customers to any nonaffiliated third parties, except as permitted by law. In the course of servicing a

Client account, Group U may share some information with its service providers, such as transfer agents, custodians, broker-dealers, accountants, and lawyers.

AAAMCO restricts internal access to nonpublic personal information about its Clients to those employees who need to know that information in order to provide products or services to the Client. AAAMCO maintains physical and procedural safeguards that comply with state and federal standards to guard a Client's nonpublic personal information and ensure its integrity and confidentiality. As emphasized above, it has always been and will always be the firm's policy never to sell information about current or former customers or their accounts to anyone. It is also the firm's policy not to share information unless required to process a transaction, at the request of the Client, or as required by law.

A copy of the firm's privacy policy notice will be provided to each Client prior to, or contemporaneously with, the execution of the Advisory Agreement. Thereafter, the firm will deliver a copy of the current privacy policy notice to its Clients on an annual basis. If you have any questions on this policy, please contact us at (305) 507-1536.

For further information:

Kevin A. Rowe
Chief Compliance Officer
Austin Atlantic Asset Management Co.

Form ADV Part 2B – Individual Disclosure Brochure

(Prepared Pursuant to SEC Rule 204 of the Investment Advisers Act of 1940)

ITEM 1:

Rodger D. Shay, Jr.

Advisor CRD#: 1008086

March 22, 2024



Address: 1 Alhambra Plaza Suite100 Coral Gables, FL 33134

Phone: 305-507-1536

Email: krowe@austinatlantic.com

This brochure supplement provides information about Rodger D. Shay, Jr. supplements the Austin Atlantic Asset Management Co. (hereinafter “AAAMCO”) brochure. You should have received a copy of that brochure. Please contact us at 305-507-1536 if you did not receive AAAMCO brochure or if you have any questions about the contents of this supplement. United States Securities and Exchange Commission (“SEC”) or by any state securities authority. Registration with the SEC does not imply any particular level of skill or training. Additional information about Austin Atlantic Assets Management Co. is available on the SEC’s website at www.adviserinfo.sec.gov.

Additional information about Rodger D. Shay, Jr. is available on the SEC’s website at www.adviserinfo.sec.gov and FINRA Broker Check: <https://brokercheck.finra.org/individual/summary/1008086>

ITEM 2 – Education Background and Business Experience

Name: Rodger D. Shay, J.

Born in 1959

Business Background

- 08/2023 to Present Austin Atlantic Asset Management Co. President Coral Gables, FL
- 03/2008 to Present Austin Atlantic Inc. President Coral Gables, FL
- 08/1997- 03/2024 Austin Atlantic Asset Management Co. Executive Vice President Coral Gables, FL
- 08/1997 to Present Austin Atlantic Capital Inc. President Coral Gables, FL

ITEM 3 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Mr. Shay, Jr. and AAAMCO. Mr. Shay, Jr. has not been involved in any reportable disciplinary events.

ITEM 4 – Other Business Activities

- Credo Holdings LLC - Manager- Real Estate Investments 2 hours per week
- Six Ess Corporation - President- Real Estate Investments- 10 hours per week
- Cristo Rey Miami High School Inc-Director and Treasure -Charitable - 20hrs month
- Catholic Charities Foundation-Investment Committee Member - Charitable 2 hrs per month
- CRM Acquisition CO., 09/01/2021 Real Estate Holding Company - 1 hour per month during business hours
- Community Development Fund, Inc.-Trustee -work with other trustees to supervise the activities of the fund and its primary vendors. investment related. 1 hr. per month
- AAI Trade Receivables, LLC- Manager -Physical Loan Participation- Manager of LLC or Trade Receivables. 4 hours per month- Non-investment related
- KayCee Building Association, Inc.- Director- Holding Company for Commercial Real Estate for a Non-profit-2 hours per month

ITEM 5 – Additional Compensation

Mr. Shay, Jr. receives compensation for investment, non-investment and occupation related activities.

ITEM 6 – Supervision

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the requirements of supervision requirements of Section 203(e)(6) of the Investment Advisor's Act ("*Act*"). The Registrant's Chief Compliance Officer, Kevin A. Rowe, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons. Should an employee or investment adviser representative of the Registrant have any questions regarding the applicability/relevance of the *Act*, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Mr. Rowe at 305-507-1536. Kevin A. Rowe, CCO, is responsible for supervision of Mr. Shay, Jr.

ITEM 7 – State Registered Advisers

A. Mr. Shay, Jr has NOT been involved in any of the events listed below.

1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:

- a) an investment or an investment-related business or activity;
- b) fraud, false statement(s), or omissions;
- c) theft, embezzlement, or other wrongful taking of property;
- d) bribery, forgery, counterfeiting, or extortion; or
- e) dishonest, unfair, or unethical practices.

2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:

- a) an investment or an investment-related business or activity;
- b) fraud, false statement(s), or omissions;
- c) theft, embezzlement, or other wrongful taking of property;
- d) bribery, forgery, counterfeiting, or extortion; or
- e) dishonest, unfair, or unethical practices.

B. Mr. Shay, Jr has not been the subject of a bankruptcy

Form ADV Part 2B – Individual Disclosure Brochure

(Prepared Pursuant to SEC Rule 204 of the Investment Advisers Act of 1940)

ITEM 1:

Kevin A. Rowe
CRD#: 4641264

March 22, 2024



Address: 1 Alhambra Plaza Suite100 Coral Gables, FL 33134

Phone: 305-507-1536

Email: krowe@austinatlantic.com

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Additional information about Kevin A. Rowe is available on the SEC’s website at www.adviserinfo.sec.gov and FINRA Broker Check: <https://brokercheck.finra.org/individual/summary/4641264>

ITEM 2 Education Background and Business Experience

Kevin A. Rowe was born in 1978. Mr. Rowe graduated from Temple University in 2000, with a Bachelor of Arts degree in Economics and a Bachelor of Science in International Business Administration. Mr. Rowe has been Chief Compliance Officer of AAAMCO since November 2014. Mr. Rowe is an outsourced Compliance Officer. Prior to joining AAAMCO, Mr. Rowe was the Chief Compliance Officer for Tov Capital Markets, Director of Account Services at TradeStation Securities Inc., and Senior Examiner at FINRA.

ITEM 3 Disciplinary Information

None.

ITEM 4 Other Business Activities

A. The supervised person is actively engaged in any other investment-related businesses or occupations.

- Mr. Rowe currently serves as the President and CEO LibScor Associates, Inc. a compliance consulting firm and serves as the Chief Compliance Officer for Austin Atlantic Capital Inc.
- Mr. Rowe is also registered with or in the process of registering with a Broker Dealer. The relationship is to serve as the Chief Compliance Officer and Principal. There is no relationship between AAAMCO and any other firm with whom Mr. Rowe will register. Mr. Rowe does not provide investment direction or sale any securities on behalf of the firms with whom he is registered.

B. The supervised person is actively engaged in non-investment-related business and occupation for compensation.

- Mr. Rowe is actively involved in business and interpersonal skill coaching and typically does not receive compensation for these.

ITEM 5 Additional Compensation

Mr. Rowe receives compensation for investment, non-investment and occupation related activities.

ITEM 6 Supervision

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)- 7 policies and procedures is to comply with the requirements of supervision requirements of Section 203(e)(6) of the Investment Advisor's Act ("Act"). The Registrant's Chief Compliance Officer, Kevin A. Rowe, is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons. Should an employee or investment adviser representative of the Registrant have any questions regarding the applicability/relevance of the Act, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Mr. Rowe at 305-507-

1536. Rodger D. Shay, Jr, President is responsible for supervision of Mr. Rowe. Mr. Shay, Jr. may be reached at 305-507-1536

ITEM 7 – State Registered Advisers

- A. Mr. Rowe has NOT been involved in any of the events listed below.
1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
 - a) an investment or an investment-related business or activity;
 - b) fraud, false statement(s), or omissions;
 - c) theft, embezzlement, or other wrongful taking of property;
 - d) bribery, forgery, counterfeiting, or extortion; or
 - e) dishonest, unfair, or unethical practices.
 2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
 - a) an investment or an investment-related business or activity;
 - b) fraud, false statement(s), or omissions;
 - c) theft, embezzlement, or other wrongful taking of property;
 - d) bribery, forgery, counterfeiting, or extortion; or
 - e) dishonest, unfair, or unethical practices.
- B. Mr. Rowe has not been the subject of a bankruptcy

THIS BROCHURE PROVIDES INFORMATION ABOUT THE QUALIFICATIONS AND BUSINESS PRACTICES OF AUSTIN ATLANTIC ASSET MANAGEMENT CO.