



## **Lynx Capital Group, Ltd.**

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**March 20, 2024**

This Brochure provides information about the qualifications and business practices of Lynx Capital Group Ltd ("Lynx", "us", "we", "our"). If you have any questions about the contents of this Brochure, please contact us at (216) 591-1309 or via email at [brian@lynxcap.com](mailto:brian@lynxcap.com). 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.

Additional information about Lynx is also available via the SEC's website [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search this site by using a unique identifying number, known as a CRD number. The CRD number for Lynx is 120459. The SEC's web site also provides information about any persons affiliated with Lynx who are registered, or are required to be registered, as Investment Adviser Representatives of Lynx.

Lynx 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 that you may use to determine whether to hire or retain them.

## Item 2: Material Changes

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Since our last annual ADV update filed on March 21, 2023, we have made the following change:

- Our SEC registration has been approved.

In the future, this section of the Brochure will discuss only the specific material changes that were made to the Brochure and will provide you with a summary of all material changes that have occurred since the last filing of this Brochure. This section will also identify the date of our last annual Brochure update.

We will ensure that you receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year end which is December 31. We will provide other ongoing disclosure information about material changes as they occur. We will also provide you with information on how to obtain the complete brochure. Currently, our Brochure can be requested at any time, without charge, by contacting at (216) 591-1309 or [brian@lynxcap.com](mailto:brian@lynxcap.com).

## Item 3: Table of Contents

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<b>Item 1 – Cover Page .....</b>	<b>1</b>
<b>Item 2: Material Changes .....</b>	<b>2</b>
<b>Item 3: Table of Contents .....</b>	<b>3</b>
<b>Item 4: Advisory Business.....</b>	<b>5</b>
<b>Services .....</b>	<b>5</b>
Assets Under Management.....	5
Asset Management .....	6
Other Services .....	8
Wrap Fee .....	8
<b>Item 5: Fees and Compensation.....</b>	<b>8</b>
<b>Item 6: Performance Based Fees and Side-by-Side Management .....</b>	<b>9</b>
<b>Item 7: Types of Client(s).....</b>	<b>9</b>
<b>Item 8: Methods of Analysis, Investment Strategies and Risk of Loss .....</b>	<b>9</b>
Fundamental Analysis .....	9
Technical Analysis .....	10
Overall Analysis .....	10
Investment Strategies .....	11
<b>Item 9: Disciplinary Information .....</b>	<b>12</b>
<b>Item 10: Other Financial Industry Activities and Affiliations .....</b>	<b>12</b>
<b>Item 11: Code of Ethics; Participation or Interest in Client Transactions and Personal Trading .....</b>	<b>13</b>
Code of Ethics.....	13
Participation or Interest in Client Accounts .....	13
Personal Trading .....	13
Responsibility .....	14
Privacy Statement .....	14
Conflicts of Interest.....	14
<b>Item 12: Brokerage Practices .....</b>	<b>15</b>
Soft Dollars .....	15
Brokerage for Client Referrals.....	15
Directed Brokerage .....	15
<b>Item 13: Review of Accounts .....</b>	<b>16</b>
Reviews of Accounts .....	16
Reports Provided by Lynx.....	16

<b>Item 14: Client Referrals and Other Compensation.....</b>	<b>16</b>
<b>Item 15: Custody.....</b>	<b>16</b>
<b>Item 16: Investment Discretion .....</b>	<b>17</b>
<b>Item 17: Voting Client Securities.....</b>	<b>17</b>
<b>Item 18: Financial Information.....</b>	<b>17</b>

## Item 4: Advisory Business

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### Introduction

Lynx is an investment adviser that provides fee-only asset management and investment advice. Lynx was founded in 1996 by Brian Chait, its President, and Chief Compliance Officer. Lynx is a registered investment adviser with the Securities and Exchange Commission (“SEC”). Lynx provides investment advice through investment adviser representatives (“**advisor**” or “**IAR**”) associated with us. Our advisors must have a minimum of three years’ investment or business experience and/or an undergraduate degree.

Lynx is an independent, family owned, fee-only investment management firm. We advise individuals, high net worth individuals, trusts, estates, pension plans, profit sharing plans, corporations, and other businesses. We manage client investment accounts within the scope of a client’s financial situation and risk profile. Lynx is committed to highly personalized and responsive service to our clients. We believe each client is unique and deserves their own specific investment plan based upon their tolerance for risk and long-term objectives, among other factors.

Brian Chait is Lynx’s sole shareholder, controlling 100% of Lynx.

### Services

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We provide investment advice and discretionary asset management. We manage client’s investment accounts, primarily with an emphasis on growth, within the parameters of the client’s objectives and financial circumstances. We offer five core investment service categories based on individual client needs:

- A Dividend Growth Strategy, which aims for stable conservative returns
- An Exchange Traded Fund (ETF) portfolio, with the goal of a global macro tactical tilt approach
- A commodity allocation through the use of Exchange traded Funds
- A covered call income generating strategy
- Customized bond and income portfolios

We primarily utilize stocks, bonds, exchange traded funds, other funds and covered options transactions in our client’s accounts. On occasion, depending on a client’s risk tolerance, we may utilize short selling strategies.

### Assets Under Management

As of December 31, 2023, we had a total of \$163,771,692 in discretionary assets under management. This total amount is managed on a discretionary basis which means, you, the client has given us the authority to determine the following without your consent prior to any transaction in the account:

- Securities to be bought or sold for your account;
- Amount of securities to be bought or sold for your account;
- Broker-dealer to be used for a purchase or sale of securities for your account; and
- Commission to be paid for purchase or sale of securities in your account.

While we may have trading discretion on your account (i.e., placing trades in your account without your approval), trading activity occurs only as necessary. Trading in a client account may be required in the following situations, among others: (1) to meet initial allocation targets, (2) after substantial cash deposits or transfer of assets from other brokerage accounts that require investment allocation, and/or (3) after a request for a withdrawal from a client account that requires liquidation of a position. In addition to targeted transactions, your account may be rebalanced or reallocated periodically in order to reestablish the targeted percentages and objectives of your initial asset allocation. You will be responsible for any and all tax consequences resulting from transactions in your account. We are not tax professionals and do not provide tax advice. However, we will work with your tax professional to assist you with tax planning. You will have the opportunity to meet with your advisor periodically to review the assets in your account.

## **Asset Management**

Asset Management is the professional management of securities (stocks, bonds, ETFs, and other securities) and assets (e.g., real estate) in order to meet your specified investment goals. The recommended portfolio may include various securities such as individual equity securities, ETFs, covered calls and bonds. With an Asset Management Account, you engage one of our advisors to assist you in developing a personalized asset allocation program and custom-tailored portfolio designed to meet your investment objectives.

You will meet with us to discuss your financial circumstances, investment goals and objectives, and to determine your risk tolerance. We may ask you to provide statements summarizing current investments, income and other earnings, recent tax returns, retirement plan information, other assets and liabilities, wills and trusts, insurance policies, and other pertinent information. Based on the information you shared with us, we will analyze your situation and recommend an appropriate asset allocation or investment strategy. Our recommendation and ongoing management are based upon your investment goals and objectives, risk tolerance, and the investment portfolio you selected. We will monitor the account, trade as necessary, and communicate with you. We will monitor your circumstances in quarterly and annual account reviews. These reviews may be conducted in person, by telephone conference, and/or via a written inquiry/questionnaire. We will work with you on an ongoing basis to evaluate your asset allocation, as well as rebalance your portfolio, as necessary, to keep it in line with your objectives. You must notify us promptly when your financial situation, goals, objectives, or needs change as these provide the basis for your investment strategy.

You may, at any time, impose restrictions on your account. Restrictions may be a specific company security, industry sector, asset class, or any other restriction you request.

Under certain conditions, securities from outside accounts may be transferred into your advisory account. However, we may recommend that you sell any security if we believe that it is not suitable for the current

recommended investment strategy. You should always consult with your tax advisor for specific tax advice.

The funds in the account will be held in custody, in your name, at a qualified custodian. We recommend that clients utilize Fidelity Investments ("**Fidelity**") as their qualified custodian. You will enter into a separate custodial agreement with Fidelity. You will, at all times, maintain full and complete ownership rights to all assets held in your managed account, including the right to withdraw securities or cash, proxy voting, and receiving transaction confirmations. You grant, in writing, limited discretionary authority to Lynx over your account so that we may select the securities and amounts of securities to be bought and sold in your account, within the parameters of your stated objectives and risk tolerance for such account. This limited authority allows Lynx to give instructions to the custodian to effect transactions, deliver securities, make payments, and certain other matters, in your account. The custodian will provide all clearing, trading, and brokerage services for your account. You will receive statements directly from the custodian periodically, monthly if there is activity in the account and, at least quarterly if there is no activity.

Lynx's asset management services include the following:

- Review of your current financial situation;
- Monitoring and tracking of assets under management, including quarterly reviews and annual rebalancing
- Providing portfolio statements, periodic rate of return reports, asset allocation statements, and rebalancing reports as needed
- Advice on asset selection
- Determination of asset allocation models
- Providing research on performance and factors relating to investments
- Assistance in setting and monitoring goals and objectives based on consultations and discussions of your risk tolerance
- Providing personal consultations as necessary

The Asset Management relationship may be terminated at any time upon written notice by either party. If written notice is made, by you, within the first five days from the date of entering into an Investment Supervisory Services Agreement with Lynx, any fees paid by you will be refunded. Thereafter, you are responsible for paying for services rendered up until the date the written notice of termination is received by us.

Certain assumptions may be made with respect to interest and inflation rates and the use of past trends and performance of the market and economy. Past performance is not an indication of future performance.

## Other Services

On occasion, we may provide specific investment advice pertaining to investments, securities, or financial circumstances not related to our standard Asset Management services. We may also assist you with the selection of other Advisers or financial services professionals.

## Wrap Fee

We do not sponsor or participate in a third-party sponsored wrap fee program.

## Item 5: Fees and Compensation

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We provide asset management services for a fee. Management fees are based on a percentage of assets under management and are billed quarterly in arrears for the services rendered based upon the most recent quarter end market value. Our Investment Supervisory Services Agreement outlines the services that you will receive and the fees you will pay. Our fees can be paid by a client by check upon receipt of our invoice or a client may authorize, via written instruction, its custodian to pay management fees owed to us directly from their account, upon the custodian's receipt of our invoice. Management fees are prorated for each contribution and withdrawal made during the applicable calendar quarter (with the exception of small inconsequential contributions and withdrawals). Upon termination any fees that are due, but have not been paid, will be billed to you through the custodian and paid directly to Lynx from your account.

Our fees do not include brokerage commissions, transaction fees, and other related costs and expenses. You may incur certain charges imposed by custodians, brokers, investment companies, and other third parties. These include fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, foreign tax withholdings, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual Funds, money market funds and exchange traded funds also may charge internal management fees, which are disclosed in the fund's prospectus. These fees include, but are not limited to, a management fee, sales charges, and other fund expenses. All such fees are in addition to our management fee. You should review all fees charged to fully understand the total amount of fees you will pay.

Certain strategies offered by us may involve investment in mutual funds. Load and no-load mutual funds may pay annual distribution charges, sometimes referred to as "12b-1 fees". We do not receive any 12b-1 fees. Any 12b-1 fees, deferred sales charges and other fee arrangements relating to mutual funds will be disclosed to you if you request us to do so. Such fees are typically described in the applicable fund's prospectus.

You may invest in ETFs, bonds, and other investments directly without our services. The advisory fees we charge may be higher or lower than those charged by other advisers for comparable services, but we believe that such costs are generally within a competitive range for similar services. The advisory fee we charge may be more than you would pay to buy or sell the securities directly on a commission basis in a non-managed account.



Generally, Lynx's advisory fee is a percentage of a client's assets under management with Lynx and will be determined from the following schedule:

Annual Fee Percentage	Portfolio Size (AUM)
1.50%	Under \$1,000,000
1.0%	\$1,000,000 - \$1,500,000
Negotiable	> \$1,500,000

There is a minimum annual fee of \$1,500 per account which may be reduced or waived under certain circumstances. The fees shown above are annual fees and may be negotiable based upon certain circumstances. No increase in the annual fee shall be effective without prior written notification. In certain situations, for example, when a client has multiple accounts managed by Lynx, we may charge a lower fee or quote a fixed fee for providing advisory services to such client. If a fixed fee is quoted, it will be determined based on the size of multiple accounts, the number of accounts, and the services rendered for each account.

## **Item 6: Performance Based Fees and Side-by-Side Management**

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We do 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 Client(s)**

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We provide Asset Management services to individuals, high net worth individuals, corporate pension and profit-sharing plans, other pooled investment vehicles (e.g. hedge funds), trusts, and corporations.

We have a minimum account opening balance \$500,000, which may be waived at the sole discretion of the adviser.

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

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### **Methods of Analysis**

We utilize a combination of fundamental and technical investment analysis, with the integration of charts, graphs, and research reports.

#### **Fundamental Analysis**

Fundamental analysis is a technique that attempts to determine a security's value by focusing on the underlying factors that affect a company's actual business and its future prospects. Fundamental analysis

is about using real data to evaluate a security's value. It refers to the analysis of the economic well-being of a financial entity as opposed to only its price movements.

Fundamental analysis serves to answer questions, such as:

- Is the company's revenue growing?
- Is it actually making a profit?
- Is it in strong-enough position to beat out its competitors in the future?
- Is it able to repay its debts?
- Is there strong, ethical management?

One of the primary assumptions of fundamental analysis is the price on the stock market does not fully reflect a stock's "real" value.

### **Technical Analysis**

Technical analysis is a technique that attempts to determine a security's value by focusing on past market data, incorporating price, volume, and market indicators. Technical analysis is about using models and trading rules based on price and volume data to identify patterns, forecast, and evaluate potential price changes.

Technical analysis is based on the beliefs that:

- Market price reflects all relevant information
- How investors think about an investment, or the psychological aspect, is fundamental to price and performance
- Prices may be cyclical or trend in a specific direction and history often repeats itself
- There are underlying identifiable patterns of price and behavior

One of the primary assumptions of technical analysis is that the price of any security in the stock market may be validated by, and predicted by, identifiable patterns of past behavior.

### **Overall Analysis**

In the course of our analysis and in the course of selecting products for our client's accounts, we utilize various resources, such as:

- Financial websites and rating services
- Bloomberg
- Standard and Poor's
- Reuters detailed analyst reports for fundamental analysis
- Daily news reports on specific equities and ETFs contained in portfolios
- Annual Reports, prospectuses, filings with the Securities and Exchange Commission
- Company press releases and earnings calls
- Key insider buying/selling analysis
- Quantitative screens comparing positions to competitors and industry
- Financial periodicals such as Wall Street Journal, Barron's and Financial Times

As with other types of analysis, the predictive nature of technical analysis can vary greatly; models and rules are often modified and updated as new patterns and behaviors develop. In utilizing both

fundamental and technical analysis, we believe we are able to gain a larger picture of the true value of a particular investment and the ability to strategize its potential. However, past performance is not an indicator of future returns.

## Investment Strategies

The investment strategies Lynx uses to implement any investment advice given to you include, but are not limited to:

- Long term purchases (securities held at least a year)
- Short term purchases (securities sold within a year)
- Trading (securities sold within 30 days)
- Margin Transactions
- Short Sales
- Option writing, including covered, uncovered and spread option strategies

Every investment and every investment strategy involves risks, both short-term and long-term. That means you can lose money. These strategies may not be suitable for everyone. The long-term purchase strategy may not do well every week, every month, every quarter or every year. Both strategies are subject to inflation, interest rate, and safety of principal and liquidity risks.

There are a number of additional risks that you need to consider in deciding to trade securities on margin. These risks include the following:

- You can lose more funds than you deposit in the margin account.
- The firm can force the sale of securities in your account.
- The firm can sell your securities without contacting you.
- You are not entitled to an extension of time on a margin call.

Options carry a high level of risk and are not suitable for all investors. The option and short sales trading risks are:

- Risk of losing your entire investment in a relatively short period of time
  - The risk of losing your entire investment increases as the option goes out of the money (OTM) and as expiration nears
- Specific exercise provisions of a specific option contract may create risks
- Regulatory agencies may impose exercise restrictions, which stops you from realizing value

For a comprehensive description of all the risks associated with our strategies, methodology, and products please refer to the glossary under Risks

**Risk of Loss** There is no guarantee that our analysis methods will yield a return. Loss of principal is always a risk and past performance is no guarantee of future results. Investing in securities involves a risk of loss that our clients should be prepared to handle. Investment decisions made by you and Lynx for your account are subject to various market, currency, political, and business risks. The investment decisions we make for you in managing your account on a discretionary basis will not always be profitable nor are there any guarantees as to any level of performance. Additionally, dividend or

interest payments are not guaranteed and may also fluctuate as market conditions change. You need to make sure you understand the risks related in investing in securities. For a comprehensive description of all the risks associated with our strategies, methodology, and products please refer to the glossary under Risks.

## **Item 9: Disciplinary Information**

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Registered Investment Advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of us or the integrity of our management. We do not have any information to disclose concerning Lynx or any of our IARs. We adhere to high ethical standards for all IARs and associates.

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

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Neither Lynx nor any of its management personnel are registered, or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

Neither Lynx nor any of its management personnel are registered, or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities

Lynx does not recommend or select other investment advisers for our clients and thus does not receive compensation from any outside source.

In addition to serving as owner and president of Lynx, Brian Chait owns and controls Boca, Inc. Boca, Inc. acts as the Investment Manager of Rampart Funds, LP. Rampart Funds, LP is a private investment fund, in which only accredited investors may invest as limited partners. On occasion, Lynx may solicit clients of Lynx to invest in Rampart Funds, LP. At the time of this disclosure document, approximately 15% of Lynx's clients are invested in this fund.

Because Lynx recommends the purchase of Rampart to some clients, and Brian Chait controls both Lynx and Boca, Inc., as well as Rampart, this may result in one or more conflicts of interest. As a result of these relationships, Brian Chait, indirectly, will receive compensation from Rampart as a result of Boca's role as Investment Manager to Rampart. This means that Brian Chait has an incentive to recommend that Lynx clients purchase partnership interests in Rampart, even if such an investment would not be appropriate for such client. In order to address these potential conflicts of interest, Lynx has adopted a Code of Ethics and compliance policies and procedures. Lynx's policies and procedures provide that the CCO will monitor client accounts that are invested in the Rampart Fund to ascertain that the purchase was in the client's best interests.

## **Item 11: Code of Ethics; Participation or Interest in Client Transactions and Personal Trading.**

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### **Code of Ethics**

We have adopted a Code of Ethics for all IAR's of the firm describing its high standards of business conduct, and fiduciary duty to you, our client. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts, the reporting of certain gifts and business entertainment items, and personal securities trading procedures. All of our IAR's must acknowledge the terms of the Code of Ethics annually, or as amended.

### **Participation or Interest in Client Accounts**

Our Compliance policies and procedures prohibit anyone associated with Lynx from having an interest in a client account or participating in the profits of a client's account without the approval of the CCO.

The following acts are prohibited:

- Employing any device, scheme or artifice to defraud
- Making any untrue statement of a material fact
- Omitting to state a material fact necessary in order to make a statement, in light of the circumstances under which it is made, not misleading
- Engaging in any fraudulent or deceitful act, practice or course of business
- Engaging in any manipulative practices

Clients and prospective clients may request a copy of the firm's Code of Ethics by contacting the Brian Chait.

### **Personal Trading**

We may recommend securities to you that we have purchased for our own accounts. We may trade securities in our account that we have recommended to you as long as we place our orders after your orders. This policy is meant to prevent us from benefiting as a result of transactions placed on behalf of advisory accounts.

We will generally place your trades individually through your accounts unless we decide to purchase or sell the same securities for several clients at approximately the same time. We may, but are not obligated to, combine or "batch" such orders to obtain best execution, to negotiate more favorable commission rates or to allocate equitably among our clients differences in prices and commission or other transaction costs. Under this procedure, transactions will be price-averaged and allocated among our clients in proportion to the purchase and sale orders placed for each client account on any given day.

We have established the following policies:

- With the exception of the Rampart Fund, we will only buy or sell for you securities of companies that the principals of ours or a related person do not have a material interest (5% or more ownership).
- No transactions will be executed which would not be deemed in your best interest.
- Securities offerings for which Fidelity acts as underwriter or syndicator will not be recommended or purchased without your express written permission.
- Priority will be given to your orders over orders of related persons
- We will not buy or sell securities for our personal portfolio(s) where the decision is derived, in whole or in part, from our role as an Investment Adviser, unless the information is also publicly available.
- You have the right to decline any investment advice given and are under no obligation to implement recommendations
- All Supervised Persons are required to disclose all personal and directed account upon commencement of employment, and thereafter.

Under certain circumstances, exceptions may be made to the policies stated within the Code of Ethics. Records of these trades, including reasons for the exceptions, will be maintained. Employee trading is continually monitored under the Code of Ethics, and to reasonably prevent conflicts of interest.

You may request a copy of the firm's Code of Ethics by contacting Brian Chait.

## **Responsibility**

It is the responsibility of all supervisory personnel to ensure that we conduct business with the highest level of ethical standards and in keeping with our fiduciary duties to you. We must put your interests first and refrain from having outside interests that conflict with your interests.

## **Privacy Statement**

We are committed to protecting the confidentiality, integrity, and security of your personal non-public information. We are committed to preventing unauthorized access to, or the use or disclosure of your personal information. Our privacy policy will be given to you at the time you open an account, and we offer our privacy policy to you quarterly thereafter. Additionally, you may always request a copy of the privacy policy.

## **Conflicts of Interest**

When appropriate, Lynx's IARs employ the same strategy for their personal investment accounts as it does for its clients. However, IARs are restricted from placing their orders in a way to benefit from the purchase or sale of a security.

We act in a fiduciary capacity. If a conflict of interest arises between us and you, we shall make every effort to resolve the conflict in your favor. When conflicts of interest may arise in the allocation of investment opportunities among the accounts that we advise, we will seek to allocate investment opportunities according to what we believe is appropriate for each account. We strive to do what is equitable and in the best interests of all the accounts we advise.

Lynx Capital Group, Ltd. has common management and control ownership with Boca Inc. Boca, Inc. is the investment manager of Rampart Funds, LP, a limited partnership. Mr. Brian Chait serves as both owner

and president of Lynx Capital Group, Ltd. and owner and control person of Boca, Inc. Clients of Lynx may be solicited into Rampart Funds, LP, providing they meet the accredited investor criteria and suitability standards. Approximately 15% of Lynx's clients are invested in the Rampart Funds, LP.

## **Item 12: Brokerage Practices**

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### **Soft Dollars**

Soft Dollar Benefits are generally defined as the practice of receiving research and other services in exchange for directing client transactions to a specific broker-dealer or investment company. We do not accept or receive soft dollar benefits from other firms such as broker-dealers, custodians, or other third parties.

However, Fidelity does provide investment research products and/or services which assist us in our investment decision-making process for you. Although this is not a material consideration when determining whether to recommend that you use the services of Fidelity, we may receive from Fidelity, without cost, computer software and related support, which allow us to better monitor your accounts maintained at Fidelity. We may receive the software and support without cost, because we render investment management services to clients that maintain accounts at Fidelity whose aggregate total assets at Fidelity exceed the established minimum required for an investment manager to receive software and support without cost. Although the investment research products and/or services that may be obtained by us will generally be used to service all of our clients, a brokerage commission paid by a specific client may be used to pay for research that is not used in managing that specific client's account.

### **Brokerage for Client Referrals**

We do not select or recommend broker-dealers based upon whether or not we receive client referrals.

### **Directed Brokerage**

We require asset management clients to use Fidelity Investments as the custodial firm for their accounts and for execution of transactions in those accounts. We have an obligation to seek best execution for our clients. By directing brokerage to Fidelity, you may pay higher fees or transaction costs than those obtainable by other broker-dealers. In most cases, we believe you are paying a discounted and reasonable rate. You may pay higher or lower fees if you select another broker-dealer. Generally, we will not negotiate lower rates below the rates established by the executing broker-dealer for this type of directed brokerage account, unless we believe that such rate is unfair or unreasonable for the size and type of transaction.

Not all advisory firms require you to direct brokerage to a specific broker/dealer. We have an obligation to seek best execution for you. In seeking best execution, the determinative factor is not the lowest possible commission cost but whether the transaction represents the best qualitative execution, taking into consideration the full range of a Broker-Dealer's services including the value of research provided, execution capability, commission rates, and responsiveness. Therefore, we will seek competitive commission rates, but we may not obtain the lowest possible commission rates for account transactions.

We do place block trades to try and obtain competitive trading costs. All accounts share the trading costs in proportion to the investment.

## **Item 13: Review of Accounts**

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### **Reviews of Accounts**

We review all accounts on a continuous basis. Individual investments are monitored daily through the use of fundamental analysis. Technical analysis charting is done periodically and on an as-needed basis when market fluctuations occur. Market conditions and news reports may also trigger a review of a client account. At a minimum, we review all accounts on a quarterly and annual basis. The President, Brian Chait is responsible for performing the reviews of all accounts.

### **Reports Provided by Lynx**

You will be provided with quarterly statement reflecting the calculation and deduction of our advisory fees. We urge you to carefully review such statements and compare the official custodial record to the account statement that we provide. If you notice any discrepancies, please contact Brian Chait.

The reports you will receive from Lynx include:

- Quarterly billing statements
- Quarterly Income and Expense transactions
- Quarterly Portfolio Overviews

You may also request a report with the above information at any time.

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

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We do not receive any economic benefit from someone who is not a client for providing investment advice or other advisory services to our clients nor do we directly or indirectly pay any compensation to another person if they refer clients to us.

## **Item 15: Custody**

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You should receive at least quarterly statements from the broker-dealer or other qualified custodian that holds and maintains your investment assets which is usually Fidelity. We urge you to carefully review such statements and compare the official custodial records to the account statements and reports that we may provide to you. Our statements may vary from custodial statements based upon account procedures, reporting dates, or valuation methodologies of certain securities. If you notice any discrepancies, please contact Brian Chait.

Your custodian, if directed by you to do so in writing, has the authority to directly pay our advisory fees to us from your account. The Custodian will provide you immediate transaction confirmations and monthly statements, either by mail or electronically per your request. Monthly statements list the total



value of the account at the beginning and end of the month and itemize all transactions and security positions in your account. For taxable accounts, the Custodian will provide you consolidated year-end summary statements including IRS forms 1099 and other tax-related forms, as applicable. We cannot make any alterations or amendments to the custodian's statements. This preserves the integrity of the custodian's statement and provides you with an independent appraisal of the value of your account.

## **Item 16: Investment Discretion**

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We are granted discretionary authority over your account, by you, at the onset of our advisory relationship. This discretionary authority is documented in writing, as well as any restrictions placed by you. This discretionary authority allows us to select which securities to buy or sell, the quantity and the dollar amount to buy or sell. In all cases, discretionary authority will be exercised in a manner consistent with the stated investment objectives and risk tolerance for your account. You will have the opportunity to meet with your advisor to periodically review your account. In the discretionary asset management of your account, we will observe the investment policies, limitations, and restrictions on your account.

## **Item 17: Voting Client Securities**

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As a matter of firm policy and practice, we do not have any authority to and do not vote proxies on behalf of advisory clients. You retain the responsibility for receiving and voting proxies for any and all securities maintained in your portfolios. We will not provide advice to you regarding your voting of proxies. The custodian will forward you copies of all proxies and shareholder communications relating to your account assets.

## **Item 18: Financial Information**

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We are required to provide you with certain financial information or disclosures about our financial condition. We have no financial commitment that would impair our ability to meet any contractual and fiduciary commitments to you, our client. We have not been the subject of any bankruptcy proceedings. In no event shall we charge advisory fees that are both in excess of twelve hundred dollars and more than six months in advance of advisory services rendered.