

Form ADV Part 2A  
Investment Advisor Brochure



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Date of Last Revision	March 26, 2024

This Form ADV Part 2A (Investment Advisor Brochure) gives information about the investment advisor and its business for the use of clients and prospective clients. If you have any questions about the contents of this brochure, please contact us using one of the methods listed above. 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 is mandatory for all persons meeting the definition of investment advisor and does not imply a certain level of skill or training.

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

***Material Changes***

Snowcap Capital Management, LLC is required to advise you of any material changes to our Firm Brochure (“Brochure”) from our last annual update. We must state clearly that we are discussing only material changes since the last annual update of our Brochure and provide the date of the last annual amendment. Please note that we do not have to provide this information to a client or prospective client who has not received a previous version of our brochure.

The following material changes have been made since our last revision dated March 17, 2023:

- *Other Financial Industry Actions and Affiliations-* Turkey Sands Gas, LLC is no longer operating.

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## ***Advisory Business***

### **Advisory Firm**

Snowcap Capital Management (“SCM”) has been providing investment advisory services since 2008. We provide individuals and other types of clients with a wide array of investment advisory services. Our firm is a limited liability company formed in the State of Texas. William E. Corrigan is the founder and President and has been in the financial services industry since 2003. P. Elaine Benningfield is the Vice-President and CCO for Snowcap Capital Management. Ms. Benningfield has been in the financial services industry since 1997.

### **Advisory Services**

❶ Snowcap Capital Management provides discretionary and non-discretionary investment advisory services to individuals, corporations, limited liability companies, partnership or other business entities, trusts, estates, and pooled investment vehicles including unregistered limited partnerships.

As of 12/31/2023, Snowcap Capital Management has \$212,705,484 of assets under management on a discretionary basis.

Services are based on the individual needs of the client. An initial interview and data gathering questionnaire is undertaken to determine the client's financial situation and investment objectives, and to give the client the opportunity to impose reasonable restrictions on the management of the account. Clients can leave standing instructions with the IA Rep to refrain from investing in securities or types of securities or invest in limited amounts of securities. Quarterly the IA Rep will notify the client in writing to contact the IA Rep if there have been any changes in the client's financial situation or investment objectives, or to impose or modify account restrictions. The IA Rep will contact or attempt to contact the client annually on these matters. It is the client's responsibility to notify the IA Rep at any time there are changes. Clients may call in at any time during normal business hours to discuss directly with the IA Rep about the client's account, financial situation, or investment needs. Clients will receive from the custodian/brokerage firm timely confirmations and at least quarterly statements containing a description of all transactions and all account activity. The client will retain rights of ownership of all securities and funds in the account to the same extent as if the client held the securities and funds outside the program. In addition to custodial statements, Snowcap Capital Management sends quarterly reports to the client.

❷ Snowcap Capital Management provides financial planning and consulting services consistent with the individual client's financial and tax status and risk/reward objectives. Planning may be comprehensive or segmented and focuses on investments, insurance, taxes, and/or estate plans.

❸ Snowcap Capital Management may provide financial services including bookkeeping, recordkeeping and bill paying for business owners and provide business consultations not involving securities. This is separate from personal planning services. Topics may include budgetary planning, succession planning, and/or business plans.

## ***Fees and Compensation***

Fees for financial planning and consulting are \$200 to \$400 per hour depending on the complexity of the engagement. Half the fee is payable upon signing the Agreement and the balance upon delivery of the written plan.

Fees for financial services are computed at an hourly rate. Various rates apply as determined by the person performing the service as follows: Bookkeeping and Bill Paying: \$60 per hour; Record Keeping \$40 per hour. Half the estimated fee is payable upon signing the Agreement and the balance upon delivery of the services.

Fees for investment advisory services are 1% for all accounts.

The specific manner in which fees are charged by SCM is established in the Client Agreement and in the subscription agreement or company agreement of the Snowcap Opportunity Fund, LP. Clients determine whether they would like SCM to directly debit fees from the Separate Management Account (“SMA”) or Capital Account, as applicable. Customarily all fees are deducted from the SMA. These fees are for advisory services only and do not include any transaction fees or commissions, which may be charged separately by the broker/dealer custodial firm. See the section heading Brokerage Practices for more information.

For investment advisory services the fee will be payable quarterly. The first payment is assessed and due at the end of the first calendar quarter and will be assessed pro rata in the event the Agreement is executed at any time other than the first day of the current calendar quarter. Subsequent payments are due and will be assessed on the first day after the end of each calendar quarter based on the value of the account assets under supervision as of the close of business on the last business day of that quarter.

Payment of fees may be paid direct by the client, or client may authorize the custodian holding client funds and securities to deduct SCM advisory fees direct from the client account in accordance with statements prepared and submitted to the custodian by SCM. A duplicate statement will be mailed to the client. The custodian will provide periodic account statements to the client. Such statements will reflect all fee withdrawals paid to Snowcap Capital Management. It is the client’s responsibility to verify the accuracy of the fee calculation. The custodian will not determine whether the fee is properly calculated.

Fees are negotiable. The minimum fee may be waived for members of the family.

Fees are not collected for services to be performed more than six months in advance.

All fees paid to SCM for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds to their shareholders. These fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee. If the fund also imposes sales charges, a client may pay an initial or deferred sales charge. A client could invest in a mutual fund directly without the services of SCM. In that case, the client would not receive the services provided by SCM which are designed, among other things, to assist the client in determining which mutual fund or funds are most appropriate to each client's financial condition and objectives. To the extent that client assets are invested in money market funds or cash positions, the fees for monitoring those assets are in addition to the fees included in the internal expenses of those funds paid to their own investment managers, which are fully disclosed in each fund’s prospectus. Accordingly, the client should review both the fees charged by the funds and the fees charged by SCM to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

For investment advisory agreements, services will continue until either party terminates the Agreement. Each agreement provides that the client may terminate the agreement within five business days of its effective date without paying any fees or penalties. The agreement also provides that once the initial five-day period has passed, either party to the agreement may terminate the agreement at any time by providing thirty days written notice.

If termination occurs prior to the end of a calendar quarter, the client will be invoiced for fees due on a pro-rata basis.

#### Financial Planning or Other Financial Services

For financial planning or other financial services, the client may terminate the Agreement at any time and a refund of the unearned fees will be made based on time and effort expended before termination. The Agreement for financial planning or other financial services terminates upon delivery of the plan or services. At this time no refunds will be made.

The Advisory Agreement contains a pre-dispute arbitration clause. Client understands that the agreement to arbitrate does not constitute a waiver of the right to seek a judicial forum where such a waiver would be void under the federal securities laws. Arbitration is final and binding on the parties.

Generally, all the normal recurring operating expenses including rent, utilities, telephone, equipment expenses and administrative salaries are borne by SCM. For the most part the only other expenses which may be assumed by the Snowcap Opportunity Fund LP and Turkey Sands Gas, LLC in addition to SCM's compensation (as detailed in the subscription agreement or company operating agreement) are custody, legal and auditing fees, transaction costs and commissions incurred through trading and any other expenses which SCM reasonable determines not to be normal and recurring operating expenses.

#### ***Performance-Based Fees and Side-By-Side Management***

We do not accept performance-based fees.

#### ***Types of Clients***

Snowcap Capital Management provides advisory services to the following types of clients:

- High Net Worth Individuals
- Trusts, Estates or Charitable Organizations
- Corporations, Limited Liability Companies, Partnerships and/or Other Business Types
- Pooled Investment Vehicles

Generally, the minimum account size is \$1,000,000, subject to a minimum annual fee of \$5,000. The minimum fee would increase the maximum percentage rate paid on smaller accounts to more than 1% annualized as shown on the standard fee schedule. However, in no case would the fee exceed 2% per year.

There is no minimum for clients retaining financial planning services.

#### ***Methods of Analysis, Investment Strategies, and Risk of Loss***

We use the following methods of analysis in formulating our investment advise and/or managing client assets:

- **Charting:** We review charts of market and security activity to identify when the market is moving up or down and to predict when or how long the trend may last and when a trend may reverse.
- **Cyclical Analysis:** We measure movements of a particular stock against the overall market to predict the price movement of a security.
- **Fundamental Analysis:** We attempt to measure the intrinsic value of a security by looking at economic and financial factors to determine if a company is underpriced (good to buy) or overpriced (good to sell). Fundamental analysis does not attempt to anticipate market movements. There is always the potential risk of a security moving up or moving down with the overall market regardless of the economic or financial factors considered in evaluating a stock.
- **Technical Analysis:** We analyze past market movements and apply that analysis to the present to recognize recurring patterns of investor behavior and potentially predict price movements. Technical analysis does not consider the underlying financial condition of a company. This presents risk in that a poorly managed or financially unsound company may underperform regardless of the overall market movement.

Snowcap Capital Management may use the following, but not all, strategies in managing client accounts provided that such strategies are appropriate to the needs of the client and consistent with the client's investment objectives, risk tolerance and time horizons:

- **Long-Term:** When utilizing this strategy, we may purchase securities with the idea of holding them for a relatively long time (a year or more). Typically, we employ this strategy when we believe the securities to be well valued.
- **Short-Term:** When utilizing this strategy, we may purchase securities with the idea of holding them for a relatively short period of time (less than one year). We do this to take advantage of a swift price swing in the securities we purchase.
- **Margin Transactions:** We may purchase securities for your portfolio with money borrowed from your account. This allows you to purchase more securities than you would be able to with your available cash and allows us to purchase securities without selling other holdings.
- **Option Writing:** We may use options as an investment strategy. An option is a contract that gives the buyer the right, but not the obligation, to buy or sell an asset (such as a share of stock) at a specific price on or before a certain date. An option is a security and a derivative because it derives its value from an underlying asset. The two types of options are puts and calls. We may use options to "hedge" a purchase of an underlying security. We may use "covered calls" or a "spread strategy", as well. These strategies are explained in detail to the client if they are used.

By its nature, financial planning looks to the long-term. After the client's short-term cash needs and emergency fund are evaluated, investment and insurance strategies are designed to help the client achieve his or her financial goals. Casualty insurance (e.g., homeowner's, auto, liability, etc.) is reviewed only at the client's request, and would be provided by an outside casualty firm.

While there is risk in all investments, some carry a greater degree of risk or higher costs. There is no guarantee that the investment strategy selected for the client will result in the client's goals being met, nor is there any guarantee of profit or protection from loss. For those investments sold by prospectus, clients should read the prospectus in full.

Snowcap Capital Management discloses those risks and opportunities for our investment strategy or for investments used.

- Debt securities are subject to interest rate risk. In our fixed-income approach, SCM generally recommends municipal bonds in taxable accounts and investment grade quality corporate bonds and/or treasuries in tax-deferred accounts to maximize after-tax returns.

- High yield securities are corporate debt securities rated below investment grade. We generally do not recommend these investments.
- By timing the buys and sells, we endeavor to control the risks by carefully watching trends in the market and partnering with our brokerage relationships to obtain timely execution of trades.
- There are tax consequences for short-term trading wherein capital gains are taxed as ordinary income. SCM seeks to acquire equities and fixed-income instruments that will be held for at least a year to capitalize on the more favorable long-term capital gains tax treatment.
- Structured products are a basket of investments that combine the upside potential of equity with the downside protections of fixed income. Structured products are complex and difficult for the average investor to understand. Structured products are used to hedge and speculate. SCM utilizes these investments only with selected long-term clients. The investment must be within the client's objectives and clients must prove to have a tolerance for the volatility of these investments.
- Oil and Gas investment may have unpredictable returns particularly in today's uncertain world where oil reserves are used as political leverage, prices are volatile, and concerns grow about security of supply they are not suitable for everyone., Therefore, the SEC requires that the investors for many oil and gas partnerships be [accredited](#), which means that they meet certain income and [net worth](#) requirements. With the backing of the U.S. government, domestic energy production has created several tax incentives for both investors and small producers.
- Real Estate investments may lack liquidity and are negatively affected by a downturn in the economic cycle. SCM only recommends these investments to accredited investors. These investments may be made in the form of a partnership or a direct purchase with multiple investors.

### ***Disciplinary Information***

An investment advisor must disclose material facts about any legal or disciplinary event that is material to a client's evaluation of the advisory business or of the integrity of its management personnel. Neither Snowcap Capital Management nor its associated persons have any disclosure items.

### ***Other Financial Industry Activities and Affiliations***

Snowcap Capital Management does not, but IA Reps of the firm serve as officers of the Goddard Investment Company and Corrigan 3B Company located in Dallas, Texas. Both entities are owned by William E. Corrigan's family. William Corrigan and P. Elaine Benningfield spend about 60% of their time operating these businesses for the Corrigan-Goddard Family. In addition to securities related transactions, they oversee the administrative operations, oil & gas, and real estate interests for the family office.

Snowcap Capital Management serves as General Partner of the Snowcap Opportunity Fund, LP. This entity was created to invest in partnerships, hedge funds, commercial property, and commercial lending ventures on behalf of selected SCM clients. Clients were introduced to the investment by SCM representatives, and each consented to individual participation in the new entity. This fund is closed.

Snowcap Capital Management serves as trustee for two trusts. SCM is responsible for the investment and management of the trust on behalf of entities in Florida.

Snowcap Capital Management serves as Manager of Turkey Sands Gas, LLC an entity created to invest in a helium company (Tacitus, LLC) on behalf of selected SCM clients and outside investors. Clients were introduced to the investment by SCM representatives, and each consented to individual participation in the new entity. In 2020, William Corrigan assumed a management position with Tacitus, LLC. Mr. Corrigan is not paid

a salary for this role but did receive an ownership share of the management company. In October 2021, Turkey Sands Gas, LLC sold its partnership interest in Tacitus, LLC. William Corrigan did receive compensation from Turkey Sands for his role in securing the sale. Turkey Sands LLC is no longer operating as a partnership and steps to close the entity are expected to complete in 2024.

Snowcap Capital Management and its associated persons are not associated with a broker-dealer, nor do they have applications pending for registration with a broker-dealer.

IA Reps of the firm are not licensed with any life, disability, and other insurance companies. If insurance products are recommended, we will provide a referral for an agent to provide the product that suits the client's overall plan. The Client is under no obligation to purchase the products the agent recommended.

Snowcap Capital Management may exercise agreements with other Registered Investment Advisors and recommend other Advisors to clients. In such instances, Snowcap Capital Management may receive a portion of the advisory fees. As these situations may represent a conflict of interest, SCM has established the following to ensure its fiduciary responsibilities:

- No employee of SCM shall buy or sell investments for their personal portfolio(s) where their decision is substantially derived, through his or her employment, unless the information is also available to the investing public or reasonable inquiry.
- SCM maintains a list of all securities holdings for anyone associated with this advisory practice. In addition, SCM receives duplicate confirmations of all transactions and duplicate statements for each employee account. These records are reviewed on a quarterly basis by the CCO.
- All clients are fully informed that a SCM IA Rep may receive a portion of the advisory fees.
- SCM emphasizes the unrestricted right of a client to decline to implement any advice rendered.
- SCM emphasizes the unrestricted right of the client to select and choose any adviser, broker-dealer and/or insurance company he/she wishes.
- SCM requires that all employees must act in accordance with all applicable Federal and State regulations governing registered investment advisory practices.
- Any associated person of SCM not in observance of the above may be subject to termination.

In these instances, we will make available to the client a "Compensation Disclosure Statement" and the Investment Advisor Brochure for the other Advisor. The client is under no obligation to use the services of the other Advisor(s) recommended.

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

#### **Code of Ethics**

SCM has adopted a Code of Ethics pursuant to Rule 204A-1 of the Investment Advisers Act of 1940, as amended, to prevent violations of federal securities laws. The Code of Ethics is predicated on the principle that SCM owes a fiduciary duty to its clients. Accordingly, SCM expects all employees to act with honesty, integrity, and professionalism and to adhere to federal securities laws. All officers, directors, members, and employees of SCM and any other person who provides advice on behalf of SCM and is subject to SCM's control and supervision are required to adhere to the Code of Ethics. SCM's Code of Ethics allows the purchase of IPOs or private placements that is subject to review by SCM's Chief Compliance Officer. Snowcap Capital Management serves as general partner or manager of private fund/pooled investment vehicles. These



investments are only introduced to qualified investors and fees and expenses must be disclosed. Clients may request to receive, at no cost, a copy of SCM's Code of Ethics, which contains its policies on employee trading, gifts, and outside business activities. Gifts of nominal value are acceptable, and all employees must disclose any outside business activities generating revenue, which must be reviewed by SCM's Chief Compliance Officer.

### Personal Securities Trading Policy

At times, the interests of Snowcap Capital Management and/or its access persons correspond with our client's interests, and then we may invest in the same securities that are recommended to clients.

Snowcap Capital Management's policy is designed to avoid conflicts of interest with our clients. We will not violate the Advisor's fiduciary responsibilities to our clients.

**Mutual funds** are purchased or redeemed at a fixed net asset value price set by the fund company. Transactions in mutual funds by access persons are not likely to have an impact on the prices of the fund shares. Access persons may buy or sell these funds on the same day as clients.

**Limited partnership offerings** have a set number of units available for purchase. We will fulfill client subscriptions first, and access persons may invest if units are remaining. Thus, we will not "race" clients into limited partnership offerings.

#### **For general securities transactions (e.g., stocks, bonds):**

- An officer, director, or employee of SCM shall not buy or sell securities for a personal portfolio when the decision to purchase is substantially derived, in whole or in part, by reason of employment with SCM, unless the information is also available to the investing public on reasonable inquiry. No person associated with SCM shall prefer his or her own interest to that of any client. Personal trades in securities being purchased or sold for clients may be affected simultaneously with or after trades are affected for clients. SCM personnel may not anticipate trades to be placed for clients. Clients are not obligated to purchase these investments.
- Scalping (trading shortly ahead of clients) is prohibited.
- Should a conflict occur because of materiality (i.e., access person's prior holding of a thinly traded security), disclosure will be made to the client(s) at the time of trading.
- Incidental trading not deemed to be a conflict (i.e., a purchase or sale which is minimal in relation to the total outstanding value, and as such would have negligible effect on the market price), would not be disclosed at the time of trading.

Snowcap Capital Management and its access persons will keep records of all personal securities transactions whether done through the firm or not.

### ***Brokerage Practices***

#### Selection or recommendation of broker/dealers

For the investment advisory program, clients may choose to implement trades and maintain custody of assets through the broker or their choice. The services of JPMorgan Chase or Merrill Lynch are routinely recommended since our firm has an established relationship with these firms. By directing brokerage through these recommended broker-dealers Snowcap Capital Management may be unable to achieve most favorable

execution of client transactions. This practice may cost the client more money on transactions. The client may choose to use a discount broker. The selection is made on the discount rates and execution services available to the client. Clients may pay transaction fees to the third-party broker for the purchase of "no-load" funds. The broker will provide the clients with consolidated statements.

Snowcap Capital Management is not affiliated with broker-dealer. IA Reps of our firm are not registered representatives of a broker-dealer and do not receive any commissions or fees from recommending these services.

### Soft Dollar Practices

Snowcap Capital Management may receive compensation from a brokerage firm in the form of research, products, or services ("soft dollars"). When a firm uses client brokerage commissions to obtain soft dollars, the firm receives a benefit by not having to produce or pay for such items. A firm may have an incentive to select or recommend a broker/dealer based on soft dollars received, rather than best execution for the client.

Snowcap Capital Management may receive soft dollar compensation from JPMorgan Chase and Merrill Lynch for research services to include reports, software, and access to money managers.

Snowcap Capital Management understands its duty for best execution and considers all factors in making recommendations to clients. These research services may be useful in servicing all SCM clients and may not be used in connection with any account that may have paid compensation to the firm providing such services. While SCM may not always obtain the lowest commission rate, SCM believes the rate is reasonable in relation to the value of the brokerage and research services provided.

### Client Referrals from Brokers

Snowcap Capital Management will generally maintain an existing broker/dealer relationship when the client is referred to Snowcap Capital Management. In maintaining the existing broker/dealer relationship, a conflict of interest may exist in obtaining best execution by SCM on behalf of the client. A conflict of interest may exist in obtaining future referrals from a broker/dealer if Snowcap Capital Management did not maintain these existing relationships. Where the client is not referred by an existing broker/dealer, SCM recommends a broker/dealer with competitive commission rates.

### Directed Brokerage

Client may direct brokerage to a specified broker/dealer other than the firm recommended by SCM. It is up to the client to negotiate the commission rate, as Snowcap Capital Management will not. The client may not be able to negotiate the most competitive rate. As a result, the client may pay more than the rate available through the broker/dealer used by SCM. In client directed brokerage arrangements, the client may not be able to participate in aggregated ("blocked") trades, which may help reduce the cost of execution. Where the client does not otherwise designate a broker/dealer, Snowcap Capital Management recommends a broker/dealer with competitive commission rates.

### Trade Aggregation

While individual client advice is provided for each account, client trades may be executed as a block trade. The Advisor encourages its existing and new clients to use the Advisor's "lead custodian." Only accounts in the

custody of the lead custodian would have the opportunity to participate in aggregated securities transactions. All trades using the lead custodian will be aggregated and done in the name of the Advisor. The executing broker will be informed that the trades are for the accounts of the Advisor's clients and not for the Advisor itself. No advisory account within the block trade will be favored over any other advisory account, and thus, each account will participate in an aggregated order at the average share price and receive the same commission rate. The aggregation should, on average, reduce slightly the costs of execution, and the Advisor will not aggregate a client's order if in a particular instance the Advisor believes that aggregation would cause the client's cost of execution to be increased. The Custodian will be notified of the amount of a trade for each account. The Advisor and/or its IA Reps may participate in block trades with clients and may also participate on a pro rata basis for partial fills, but only if clients receive fair and equitable treatment.

### ***Review of Accounts***

Snowcap Capital Management monitors the individual investments within the investment advisory program each day the market is open. Portfolio performance is reviewed on a quarterly basis at a minimum. Snowcap Capital Management offers investment advisory program clients an in-person portfolio review meeting on an annual basis.

The financial plan is a snapshot in time and no ongoing reviews are conducted. We recommend clients engage us on an annual basis to update the financial plan and/or investment objectives.

The account reviews are performed by the client's IA Rep. The Chief Compliance Officer and other designated compliance staff monitor the portfolios and financial plans for investment objectives and perform other supervisory reviews.

All clients receive standard account statements from investment sponsors and brokerage firms. Investment Advisory clients receive a written quarterly performance report from Snowcap Capital Management.

### ***Promoter Arrangements***

#### **Use of Promoters**

Snowcap Capital Management does not compensate solicitors or pay any finders fees.

#### **Acting as Promoter**

Snowcap Capital Management and its IA Reps may act as solicitors to other investment advisors, and will comply with the Marketing Rules to include:

We will only recommend to a client that the client engage the services of another investment advisor if that outside investment advisor is licensed under applicable federal and state licensing requirements. Elaine Benningfield will perform due diligence on these financial service entities to review status of licensing prior to any recommendations.

We will execute a Promoter Agreement with the outside investment advisor/money manager.

The IA Rep will deliver to the client at the time of the solicitation; the outside investment advisor's Form ADV Part 2, the Compensation Disclosure Document, and the Client Acknowledgement. The Client Acknowledgement will be returned to the outside investment advisor, and we shall maintain a copy.

## ***Custody***

Snowcap Capital Management is deemed to have custody of client funds because of the fee deduction authority granted by the client in the investment advisory agreement and in some cases SCM is authorized by a power of attorney to withdraw funds or to take custody of client funds or securities as needed to perform services detailed in the client agreement.

Clients will receive account statements at least quarterly from the broker-dealer or other qualified custodian. Clients are urged to compare custodial account statements against statements prepared by Snowcap Capital Management for accuracy. Minor variations may occur because of reporting dates, accrual methods of interest and dividends, and other factors. The custodial statement is the official record of your account for tax purposes.

## ***Investment Discretion***

Snowcap Capital Management maintains full discretion under a limited power of attorney as to the securities and number of securities purchased or sold in portfolios.

In some instances, Snowcap Capital Management will have authority to withdraw funds or to take custody of client funds or securities to facilitate client requests or allocate assets. This is only done with the execution of a power of attorney document in addition to the client agreement. Snowcap Capital Management only assumes this authority as needed to perform services detailed in the client agreement.

Snowcap Capital Management does NOT have the ability to discount brokerage commissions.

The client will designate the broker/dealer to be used for trading and custodial services. Snowcap Capital Management may “trade away” for bond transactions to seek best execution. The bonds will be held at the broker/dealer designated by the client under a prime brokerage arrangement.

## ***Voting Client Securities***

Snowcap Capital Management does not accept proxy authority to vote client securities. Clients will receive proxies or other solicitations directly from their custodian or a transfer agent. If proxies are sent to our firm, we will forward them on to you and ask the party who sent them to mail them to you in the future. Clients may call, write, or email us to discuss questions they may have about proxy votes or other solicitations. Third party money managers selected or recommended by our firm may vote proxies for clients. Therefore, except in the event a third-party money manager votes proxies, clients maintain exclusive responsibility for: (1) directing the way proxies solicited by issuers of securities beneficially owned by the client shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type of events pertaining to the client’s investment assets. Therefore (except for proxies that may be voted by a third-party money manager), our firm and/or you shall instruct your qualified custodian to forward to you copies of all proxies and shareholder communications relating to your investment assets.

## ***Financial Information***

An investment advisor must provide financial information if a threshold of fee prepayments is met; there is a financial condition likely to impair the ability to meet contractual commitments; or, a bankruptcy within the past ten years. Snowcap Capital Management does not have any disclosure items in this section.