

**Item 1: Cover Page for Part 2A of  
Form ADV: Firm Brochure  
March 2024**



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This brochure provides information about the qualifications and business practices of Collar Capital Management, LLC. If you have any questions about the contents of this brochure, please contact us by telephone at (920) 830-1556 or by email at [patrick@collarcapital.com](mailto:patrick@collarcapital.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any State Securities Authority.

Additional information about Collar Capital Management, LLC also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching CRD #152325. -

Please note that the use of the term "registered investment adviser" and description of Collar Capital Management, LLC and/or our associates as "registered" does not imply a certain level of skill or training. You are encouraged to review this Brochure and Brochure Supplements for our firms' associates who advise you for more information on the qualifications of our firm and its employees.

## **Item 2: Material Changes to Our Part 2A of Form ADV: Firm Brochure**

**Collar Capital Management, LLC** is required to advise you of any material changes to our Firm Brochure ("Brochure") from our last annual update, identify those changes on the cover page of our Brochure or on the page immediately following the cover page, or in a separate communication accompanying our Brochure. We must state clearly that we are discussing only material changes since the last annual update of our Brochure, and we must provide the date of the last annual update of our Brochure.

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 material changes in this brochure from the last annual updating amendment of Collar Capital Management, LLC on 03/06/2023 are described below. Material changes relate to Collar Capital Management, LLC's policies, practices or conflicts of interests.

- Collar Capital Management, LLC has amended their fee structure for their Asset Management Service, as disclosed in Item 5: Fees and Compensation.

## Item 3: Table of Contents

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## Item 4: Advisory Business

We are dedicated to providing 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 Wisconsin. Our firm has been in business as an investment adviser since 2009 and is solely owned by Patrick Collar.

### Description of the Types of Advisory Services We Offer

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#### **Asset Management:**

Collar Capital Management, LLC engages in continuous and regular account supervision. As part of our asset management service, we will create a portfolio, consisting of individual stocks or bonds, exchange traded funds ("ETFs"), closed-end funds, and when appropriate, we will utilize options for the purposes of hedging and occasionally speculation. Mutual funds may be transferred into a client's account and held; however, we do not open new positions in mutual funds. Collar Capital Management, LLC does not invest in private securities in any client accounts. Each client's individual investment strategy is tailored to their specific needs and may include some or all of the previously mentioned securities. Each portfolio will be initially designed to meet a particular investment goal, which we determine to be suitable to the client's circumstances. Once the appropriate portfolio has been determined, we review the portfolio at least quarterly and if necessary, rebalance the portfolio based upon the client's individual needs, stated goals and objectives. Each client has the opportunity to place reasonable restrictions on the types of investments to be held in the portfolio.

#### **Pension Consultations:**

We provide pension consulting services to employer plan sponsors on a one-time or ongoing basis. Generally, such pension consulting services consist of assisting employer plan sponsors in establishing, monitoring and reviewing their company's participant-directed retirement plan. As the needs of the plan sponsor dictate, areas of advising could include: investment options, plan structure and participant education.

The Client may be required to complete a questionnaire to assist the Adviser in formulating the Client's pension consulting objectives. Copies of certain Client documents may be requested by the Adviser to assist in conducting a more complete evaluation of the Client's pension consulting objectives and to prepare a pension plan. The Adviser may reasonably request certain of the following documents: insurance policies, wills, tax returns, and other documents depending upon the Client's circumstances, in order to permit a complete pension evaluation.

All pension consulting services shall be in compliance with the Investment Advisers Act of 1940, rules and regulations thereunder, and applicable federal law(s) regulating the services provided by this agreement. This section applies to an Account that is a pension or other employee benefit plan (a "Plan") governed by the Employee Retirement Income Security Act of 1974, as amended ("ERISA"). If the account is part of a Plan and we accept appointments to provide Adviser's services to such account, Adviser acknowledges that it is a fiduciary within the meaning of Section 3(21) of ERISA (but only with respect to the provision of services described in section 1 of this agreement). Client represents that (i) Adviser's appointment and services are consistent with the Plan documents, (ii) Client has furnished Adviser true and complete copies of all documents establishing and governing the Plan and evidencing your authority to retain Adviser. Client further represents that he/she/it will promptly furnish Adviser with any amendments to the Plan, and Client agrees that, if any amendment affects our rights or obligations, such amendment will be binding on Adviser only with our prior

written consent. If the account contains only a part of the assets of the Plan, Client understand that Adviser will have no responsibilities for the diversification of all the Plan's investments, and Adviser will have no duty, responsibility or liability for the assets that are not in the account. If ERISA or other applicable law requires bonding with respect to the assets in the account, Client will obtain and maintain at his/her/its expense bonding that satisfies this requirement and covers Adviser and any of our affiliates.

Pension consultations are typically completed within six (6) months of the client signing a contract with us, assuming that all the information and documents we request from the client are provided to us promptly. Implementation of the recommendations will be at the discretion of the client.

#### **Newsletters:**

Adviser may provide newsletters to its advisory clients without a separate fee.

#### **Tailoring of Advisory Services**

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We offer individualized investment advice to clients utilizing the following services offered by our firm: Asset Management. Additionally, we offer general investment advice to clients utilizing the following services offered by our firm's Pension Consulting service.

Each client has the opportunity to place reasonable restrictions on the types of investments to be held in the portfolio. Restrictions on investments in certain securities or types of securities may not be possible due to the level of difficulty this would entail in managing the account. Restrictions would be limited to our Asset Management service. We do not manage assets through our other services.

#### **Participation in Wrap Fee Programs**

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We do not offer wrap fee programs.

#### **Regulatory Assets Under Management**

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We manage \$105,754,561 on a discretionary basis and \$7,751,902 on a non-discretionary basis as of December 31<sup>st</sup>, 2023.

### **Item 5: Fees & Compensation**

We are required to describe our brokerage, custody, fees, and fund expenses so you will know how much you are charged and by whom our advisory services are provided to you. Our fees are generally not negotiable.

#### **How We Are Compensated for Our Advisory Services**

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##### **Asset Management:**

<b>Assets Under Management</b>	<b>Annual Percentage of Assets Charge</b>
Up to \$500,000	1.50%
\$500,001 to \$1,000,00	1.35%
\$1,000,001 to \$2,000,000	1.25%
\$2,000,001 to \$9,999,999	1.00%
Over \$10,000,000	0.85%

Exceptions may be made to the published fee schedule under certain circumstances pursuant to a negotiated agreement with the client. The fixed annual fee (to be paid in lieu of the fee schedule) will range from \$1,500 - \$10,000 and shall be paid quarterly in advance via invoice.

\*Our firms' fees are billed, calculated and deducted daily on a pro-rata annualized basis on the net liquidation value of your account. In 2024, there will be 252 trading days.

Fees will generally be automatically deducted from your managed account\*. As part of this process, you understand and acknowledge the following:

- a) Your independent custodian sends statements at least quarterly to you showing the market values for each security included in the Assets and all disbursements for your account, including the amount of the advisory fees paid to us;
- b) You provide authorization permitting us to be directly paid by these terms;
- c) If our firm sends a copy of our invoice to the client, a legend urging the comparison of information provided in our statement with those from the qualified custodian will be included.

\*In rare cases, we will agree to directly bill clients.

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<sup>1</sup> Please note that our method for computing the amount of "*client* assets we manage" can be different from the method for computing "assets under management" required for Item 5.F in Part 1A of Form ADV. However, we have chosen to follow the method outlined for Item 5.F in Part 1A of Form ADV. If we decide to use a different method at a later date to compute "*client* assets we manage," we must keep documentation describing the method we use and inform you of the change. The amount of assets we manage may be disclosed by rounding to the nearest \$100,000. Our "as of" date must not be more than three months before the date we last updated our *Brochure* in response to Item 4.E of Form ADV Part 2A.

## **Pension Consultations:**

Adviser's annual fees for pension consulting services provided under this agreement shall be based on the market value of the assets and shall generally be calculated at up to 0.50% of all plan asset value.

In addition to Adviser's consulting fee, the Client may also incur certain charges imposed by unaffiliated third parties. Such charges include, but are not limited to, custodial fees, administrative fees, brokerage commissions, transaction fees, charges imposed directly by a mutual fund, index fund, or exchange traded fund purchased for the account which shall be disclosed in the fund's prospectus (i.e., fund management fees and other fund expenses), wire transfer fees and other fees and taxes on brokerage accounts and securities transactions.

The fee for pension consulting will be billed quarterly via invoice to the client, and shall be paid within ten (10) days of the billing period.

## **Other Types of Fees & Expenses**

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Our clients will incur transaction charges for trades executed in their accounts. These transaction fees are separate from our fees and will be disclosed by the custodian that the trades are executed through. Also, clients will pay the following separately incurred expenses, which we do not receive any part of: charges imposed directly by a mutual fund, index fund, or exchange traded fund which shall be disclosed in the fund's prospectus (i.e., fund management fees and other fund expenses).

## **Terminations & Refunds**

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We charge our individual client advisory fees daily in arrears. In the event that you wish to terminate our services, we will stop charging fees immediately or no later than 5 business days from the time of the termination request. You need to contact us in writing and state that you wish to terminate our services. Upon receipt of your letter of termination, we will discontinue charging of fees on the account(s), and the client may transfer the account or ask for liquidation of the assets. If we do not stop charging our daily fees within 5 business days, our firm will refund you any fees that were charged in error.

## **Commissionable Securities Sales**

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We do not sell securities for a commission. In order to sell securities for a commission, we would need to have our associated persons registered with a broker-dealer. We have chosen not to do so.

### **Item 6: Performance-Based Fees & Side-By-Side Management**

We do not charge performance fees to our clients.

### **Item 7: Types of Clients & Account Requirements**

We have the following types of clients:

- Individuals;
- High Net Worth Individuals.

Our requirements for opening and maintaining accounts or otherwise engaging us:

- We do not require a minimum account balance for our Asset Management service.

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

### **Methods of Analysis**

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

- Fundamental;
- Technical;
- Cyclical.

### **Investment Strategies We Use**

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We use the following 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, among other considerations:

- Long term purchases (securities held at least a year);
- Short term purchases (securities sold within a year);
- Trading (securities sold within 30 days);
- Short sales;
- Margin transactions;
- Option writing, including covered options, uncovered options or spreading strategies.

### **Risk of Loss**

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Investing in securities involves risk of loss that clients should be prepared to bear. While the stock market may increase and your account(s) could enjoy a gain, it is also possible that the stock market may decrease and your account(s) could suffer a loss. It is important that you understand the risks associated with investing in the stock market, are appropriately diversified in your investments, and ask us any questions you may have.

### **Description of Material, Significant or Unusual Risks**

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We generally invest client's cash balances in money market funds, FDIC Insured Certificates of Deposit, high-grade commercial paper and/or government backed debt instruments. Ultimately, we try to achieve the highest return on our client's cash balances through relatively low-risk conservative investments. In most cases, at least a partial cash balance will be maintained in a money market account so that our firm may debit advisory fees for our Asset Management services.

## **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 & Affiliations**

Mr. Cacia is a licensed insurance agent. He may offer products and receive normal and customary commissions as a result of these transactions. A conflict of interest may arise as these commissionable securities sales may create an incentive to recommend products based on the



compensation he may earn.

Mr. Cacia is an investment advisor representative of Roshelen, Inc. (CRD #170904). Mr. Cacia is also a solicitor and client relationship manager to Collar Capital Management, LLC. From time to time, he may offer clients advice or products from those activities and clients should be aware that these services may involve a conflict of interest. Collar Capital Management, LLC always acts in the best interest of the client and clients always have the right to decide whether or not to utilize the services of any Collar Capital Management, LLC representative in such individual's outside capacities.

### **Item 11: Code of Ethics, Participation or Interest in Client Transactions & Personal Trading**

We recognize that the personal investment transactions of members and employees of our firm demand the application of a high Code of Ethics and require that all such transactions be carried out in a way that does not endanger the interest of any client. At the same time, we believe that if investment goals are similar for clients and for members and employees of our firm, it is logical and even desirable that there be common ownership of some securities.

Therefore, in order to prevent conflicts of interest, we have in place a set of procedures (including a pre-clearing procedure) with respect to transactions effected by our members, officers and employees for their personal accounts. In order to monitor compliance with our personal trading policy, we have a quarterly securities transaction reporting system for all of our associates.

Furthermore, our firm has established a Code of Ethics which applies to all of our associated persons. An investment adviser is considered a fiduciary. As a fiduciary, it is an investment adviser's responsibility to provide fair and full disclosure of all material facts and to act solely in the best interest of each of our clients at all times. We have a fiduciary duty to all clients. Our fiduciary duty is considered the core underlying principle for our Code of Ethics which also includes Insider Trading and Personal Securities Transactions Policies and Procedures. We require all of our supervised persons to conduct business with the highest level of ethical standards and to comply with all federal and state securities laws at all times. Upon employment or affiliation and at least annually thereafter, all supervised persons will sign an acknowledgement that they have read, understand, and agree to comply with our Code of Ethics. Our firm and supervised persons must conduct business in an honest, ethical, and fair manner and avoid all circumstances that might negatively affect or appear to affect our duty of complete loyalty to all clients. This disclosure is provided to give all clients a summary of our Code of Ethics. However, if a client or a potential client wishes to review our Code of Ethics in its entirety, a copy will be provided promptly upon request.

Related persons of our firm may buy or sell securities and other investments that are also recommended to clients. In order to minimize this conflict of interest, our related persons will place client interests ahead of their own interests and adhere to our firm's Code of Ethics, a copy of which is available upon request.

Related persons of our firm may buy or sell securities for themselves at or about the same time they buy or sell the same securities for client accounts. In order to minimize this conflict of interest, our related persons will place client interests ahead of their own interests and adhere to our firm's Code of Ethics, a copy of which is available upon request. Further, our related persons will refrain from buying or selling the same securities within 48 hours prior to buying or selling for our clients. If related persons' accounts are included in a block trade, our related persons will always trade personal accounts last.

## **Compliance with Department of Labor Fiduciary Rule**

Our firm provides investment advice to assets affected by the Department of Labor (“DOL”) Fiduciary Rule for a level fee. As such, we abide by the Impartial Conduct Standards as defined by the DOL. To comply with these standards, our firm and our advisors give advice that is in our clients’ best interest, charge no more than reasonable compensation (within the meaning of ERISA Section 408(b)(2) and Internal Revenue Code Section 4975(d)(2), and make no misleading statements about investment transactions, compensation, conflicts of interest, and any other matters related to investment decisions. As a level-fee fiduciary, we maintain a non-variable compensation structure that is provided on the basis of a fixed percentage of the value of assets or a set fee that does not vary with the particular investment recommended, as opposed to a commission or other transaction based fee.

## **Item 12: Brokerage Practices**

### **Selecting a Brokerage Firm**

We may execute or recommend that clients execute their securities transactions through various firms. The choice of which firm to execute trades through will be determined on the financial strength of the broker or dealer, its reputation, pricing and ability to execute trades in a timely manner. In many cases, we execute trades through Interactive Brokers LLC (“Interactive Brokers”), Member FINRA, NYSE, SIPC. Under the arrangement with Interactive Brokers, we receive services which include, among others, brokerage, custodial, administrative support; record keeping and related services that are intended to support our firm in conducting business and in serving the best interests of our clients but that may benefit our firm.

As part of the arrangement described above, we pay a fee to Interactive Brokers to receive research, news, quotes, as well as fees directly to NYSE as part of our doing business with Interactive Brokers. Interactive Brokers charges these fees in an a la carte manner on their Trader Workstation.

We may also have an incentive to continue to use or expand the use of Interactive Brokers’ services. Our firm examined this potential conflict of interest when we chose to enter into the relationship with Interactive Brokers and we have determined that the relationship is in the best interest of our firm’s clients and satisfies our client obligations, including our duty to seek best execution.

Interactive Brokers charges brokerage commissions and transaction fees for effecting certain securities transactions (i.e., transaction fees are charged for certain no-load mutual funds, commissions are charged for individual equity and debt securities transactions). Interactive Brokers enables us to obtain many no-load mutual funds without transaction charges and other no-load funds at nominal transaction charges. Interactive Brokers’ commission rates are generally discounted from customary retail commission rates. However, the commission and transaction fees charged by Interactive Brokers may be higher or lower than those charged by other custodians and broker-dealers.

Our clients may pay a commission to Interactive Brokers that is higher than another qualified broker dealer might charge to effect the same transaction where we determine in good faith that the commission is reasonable in relation to the value of the brokerage and research services received. In seeking best execution, the determinative factor is not the lowest possible 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. Accordingly, although we will seek competitive rates, to the benefit of all clients, we may not necessarily obtain the lowest possible commission rates for specific client

account transactions.

### **Soft Dollars**

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Although the investment research products and services that may be obtained by our firm 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.

### **Client Brokerage Commissions**

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Our firm does not receive brokerage for client referrals.

### **Directed Brokerage**

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Neither we nor any of our firm's related persons have discretionary authority in making the determination of the brokers with whom orders for the purchase or sale of securities are placed for execution, and the commission rates at which such securities transactions are effected.

### **Special Considerations for ERISA Clients**

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A retirement or ERISA plan client may direct all or part of portfolio transactions for its account through a specific broker or dealer in order to obtain goods or services on behalf of the plan. Such direction is permitted provided that the goods and services provided are reasonable expenses of the plan incurred in the ordinary course of its business for which it otherwise would be obligated and empowered to pay. ERISA prohibits directed brokerage arrangements when the goods or services purchased are not for the exclusive benefit of the plan. Consequently, we will request that plan sponsors who direct plan brokerage provide us with a letter documenting that this arrangement will be for the exclusive benefit of the plan.

### **Permissibility of Client-Directed Brokerage**

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We do not allow client-directed brokerage.

### **Aggregation of Purchase or Sale**

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We perform investment management services for various clients. There are occasions on which portfolio transactions may be executed as part of concurrent authorizations to purchase or sell the same security for numerous accounts served by our firm, which involve accounts with similar investment objectives. Although such concurrent authorizations potentially could be either advantageous or disadvantageous to any one or more particular accounts, they are affected only when we believe that to do so will be in the best interest of the effected accounts. When such concurrent authorizations occur, the objective is to allocate the executions in a manner which is deemed equitable to the accounts involved. In any given situation, we attempt to allocate trade executions in the most equitable manner possible, taking into consideration client objectives, current asset allocation and availability of funds using price averaging, proration and consistently non-arbitrary methods of allocation.

## **Item 13: Review of Accounts or Financial Plans**

We review accounts on at least a quarterly basis for our clients subscribing to our firm's Asset Management services. The nature of these reviews is to learn whether clients' accounts are in line with

their investment objectives, appropriately positioned based on market conditions, and investment policies, if applicable. Mr. Patrick Collar, Chief Compliance Officer, will conduct review of all client accounts.

Pension Consulting clients do not receive reviews of their pension plans unless they take action to schedule a consultation with us. We also provide ongoing services to Pension Consulting clients where we meet with such clients upon their request to discuss updates to their plans, changes in their circumstances, etc.

We may review client accounts more frequently than described above. Among the factors which may trigger an off-cycle review are major market or economic events, the client's life events, requests by the client, etc.

We do not provide written reports to clients, unless asked to do so. Verbal reports to clients take place on at least an annual basis when we meet with clients who subscribe to our Asset Management services. Our custodian's website allows our clients to login to their accounts and view reports and statements daily, monthly, quarterly, annually, and in customized date ranges. Our custodian's website also provides a portfolio analyst tool that provides performance and risk measurements on a 1, 3, 5, 10, and Since Inception time frame free of charge. The portfolio analyst tool also allows for benchmarks like the S&P 500 to be utilized to compare performance to a client's portfolio.

As mentioned above, Pension Consulting clients do not receive written or verbal updated reports regarding their pension plans unless they choose to contract with us for ongoing Pension Consulting services. Our pension clients have access to the custodians' website for reports and statements.

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

### **Interactive Brokers:**

We may execute or recommend that clients execute their securities transactions through various firms. The choice of which firm to execute trades through will be determined on the financial strength of the broker or dealer, its reputation, pricing and ability to execute trades in a timely manner. In many cases, Adviser executes trades through Interactive Brokers LLC ("Interactive Brokers"), Member FINRA, NYSE, SIPC. Interactive Brokers will generally custody client's assets. Interactive Brokers and/or other firms may be paid certain advisory fees, product management fees (on annuities and securities such as mutual funds), administrative fees and/or transaction charges for its role with respect to Adviser's accounts. It is important to note that the chosen broker-dealer does not maintain supervisory relationships with respect to Adviser or its representatives. The Adviser is a separately registered and independently controlled entity.

Some clients may instruct Adviser to use one or more particular broker-dealers for the transactions in their accounts. Clients who may want to direct Adviser to use a particular broker-dealer should understand that this may prevent Adviser from effectively negotiating brokerage costs on their behalf. This arrangement may also prevent Adviser from obtaining the most favorable net price and best execution. Thus, when directing brokerage business, clients should consider whether the commission expenses, execution, clearance, and settlement capabilities that they will obtain through their broker-dealer are adequately favorable in comparison to those that Adviser would otherwise obtain for its clients. In addition, a disparity in commission charges may exist between the commissions charged to other clients.

Adviser reserves the right to decline acceptance of any client account that directs the use of a broker

dealer other than Interactive Brokers, if Adviser believes that the broker dealer would adversely affect Adviser's fiduciary duty to the client and/or ability to effectively service the client portfolio.

Adviser does not maintain custody of client assets. In managed account cases, Activity Statements are generated on a daily, monthly, and yearly basis for the Client from the custodian containing a description of all activity in the Client's Account. Clients provide written authorization permitting Adviser to be paid directly for their accounts held by the custodian or trustee.

### **Referral Fees**

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We may pay referral fees (non-commission based) to independent solicitors (non-registered representatives) specifically, Roshelen, Inc. for the referral of their clients to our firm in accordance with the Investment Advisers Act of 1940. Such referral fee represents a share of our investment advisory fee charged to our clients. This arrangement will not result in higher costs to you. In this regard, we maintain Solicitors Agreements in compliance with applicable state and federal laws. All clients referred by Solicitors to our firm will be given full written disclosure describing the terms and fee arrangements between our firm and Solicitor(s). In cases where the Investment Advisers Act of 1940 or state or federal law requires licensure of solicitors, we ensure that no solicitation fees are paid unless the solicitor is registered as an investment adviser representative of our firm. If we are paying solicitation fees to another registered investment adviser, the licensure of individuals is the other firm's responsibility.

## **Item 15: Custody**

### **Deduction of Advisory Fees:**

While our firm does not maintain physical custody of client assets (which are maintained by a qualified custodian, as discussed above), we are deemed to have custody of certain client assets if given the authority to withdraw assets from client accounts, as further described below under "Third Party Money Movement." All of our clients receive account statements directly from their qualified custodian(s) at least quarterly upon opening of an account. We urge our clients to carefully review these statements. Additionally, if our firm decides to send its own account statements to clients, such statements will include a legend that recommends the client compare the account statements received from the qualified custodian with those received from our firm. Clients are encouraged to raise any questions with us about the custody, safety or security of their assets and our custodial recommendations.

### **Third Party Money Movement:**

On February 21, 2017, the SEC issued a no-action letter ("Letter") with respect to Rule 206(4)-2 ("Custody Rule") under the Investment Advisers Act of 1940 ("Advisers Act"). The letter provided guidance on the Custody Rule as well as clarified that an adviser who has the power to disburse client funds to a third party under a standing letter of authorization ("SLOA") is deemed to have custody. As such, our firm has adopted the following safeguards in conjunction with our custodian:

- The client provides an instruction to the qualified custodian, in writing, that includes the client's signature, the third party's name, and either the third party's address or the third party's account number at a custodian to which the transfer should be directed.

- The client authorizes the investment adviser, in writing, either on the qualified custodian's form or separately, to direct transfers to the third party either on a specified schedule or from time to time.
- The client's qualified custodian performs appropriate verification of the instruction, such as a signature review or other method to verify the client's authorization, and provides a transfer of funds notice to the client promptly after each transfer.
- The client has the ability to terminate or change the instruction to the client's qualified custodian.
- The investment adviser has no authority or ability to designate or change the identity of the third party, the address, or any other information about the third party contained in the client's instruction.
- The investment adviser maintains records showing that the third party is not a related party of the investment adviser or located at the same address as the investment adviser.
- The client's qualified custodian sends the client, in writing, an initial notice confirming the instruction and an annual notice reconfirming the instruction.

### **Item 16: Investment Discretion**

Our clients need to sign a discretionary investment advisory agreement with our firm for the management of their account. This type of agreement only applies to our Asset Management clients. We do not take or exercise discretion with respect to our other clients.

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

SEC Rule 206(4)-6 requires investment advisers who have voting authority with respect to securities held in their clients' accounts to monitor corporate actions and vote proxies in their clients' interests. We are required by the SEC to adopt written policies and procedures, make those policies and procedures available to clients, and retain certain records with respect to proxy votes cast.

We consider proxy voting an important right of our clients as shareholders and believe that reasonable care and diligence must be taken to ensure that such rights are properly and timely exercised. Clients may request a copy of our written policies and procedures regarding proxy voting and/or information on how particular proxies were voted by contacting our chief compliance officer, Patrick Collar, by phone at (920) 830-1556 or email at [patrick@collarcapital.com](mailto:patrick@collarcapital.com).

#### **Policy for Voting Proxies**

We vote the proxies online as they come into our office. They are voted on behalf of clients and in a timely manner by the Compliance Analyst in our office.

We look to ensure that our firm is compliant with the New Exchange Act Rule 14a-11. In accordance with the aforementioned rule, our firm provides shareholders with the opportunity to nominate directors at a shareholder meeting under the applicable state or foreign law. Clients also have the ability to have their nominees included in the company proxy materials sent to all of our shareholders. Furthermore, the clients as shareholders also have the ability to use the shareholder proposal process to establish procedures for the inclusion of shareholder director nominations in company proxy materials.

#### **Proxies Voting Guidelines**

Where voting authority exists, proxies are voted by our firm on behalf of clients. Our firm will defer



to client voting policies as directed. Detailed records of all votes are maintained electronically and reported to clients as requested.

We recognize that under certain circumstances we may have a conflict of interest between us and our clients. Such circumstances may include, but are not limited to, situations where our firm or one or more of our affiliates, including officers, directors and employees, has or is seeking a client relationship with the issuer of the security that is the subject of the proxy vote. We shall periodically inform our employees that they are under an obligation to be aware of the potential for conflicts of interest on the part of our firm with respect to voting proxies on behalf of funds, both as a result of our employee's personal relationships and due to circumstances that may arise during the conduct of our business, and to bring conflicts of interest of which they become aware to the attention of the proxy manager. We shall not vote proxies relating to such issuers on behalf of client accounts until we have determined that the conflict of interest is not material or a method of resolving such conflict of interest has been agreed upon by our management team. A conflict of interest will be considered material to the extent that it is determined that such conflict has the potential to influence our decision-making in voting a proxy. Materiality determinations will be based upon an assessment of the particular facts and circumstances. If we determine that a conflict of interest is not material, we may vote proxies notwithstanding the existence of a conflict. If the conflict of interest is determined to be material, the conflict shall be disclosed to our management team and we shall follow the instructions of the management team. We shall keep a record of all materiality decisions and report them to the management team on an annual basis.

Our Chief Compliance Officer will maintain files relating to our proxy voting procedures. Records will be maintained and preserved for five years from the end of the fiscal year during which the last entry was made on a record, with records for the last two years kept on our premises. Records of the following will be included in the files:

- Copies of the proxy voting policies and procedures, and any amendments thereto.
- An electronic record of each vote that we cast.
- A copy of each written client request for information on how we voted such client's proxies, and a copy of any written response to any client request for information on how we voted their proxies.

Clients may request a copy of our written policies and procedures regarding proxy voting and/or information on how particular proxies were voted by contacting our chief compliance officer, Patrick Collar, by phone at (920) 830-1556 or email at [patrick@collarcapital.com](mailto:patrick@collarcapital.com).

We do not use a third-party proxy voting service or charge an additional fee to vote proxies.

## **Item 18: Financial Information**

We are not required to provide financial information in this Brochure because:

- We do not require the prepayment of more than \$1,200 in fees and six or more months in advance.
- We do not take custody of client funds or securities.

In light of the COVID-19 coronavirus and historic decline in market values, We have elected to participate in the CARES Act's Paycheck Protection Program ("PPP") to strengthen our balance sheet. We intend to use this loan predominantly to continue payroll for the firm and may ultimately seek loan forgiveness per the terms of the PPP. Due to this and other measures taken internally, We have

been able to operate and continue serving our clients.

We have never been the subject of a bankruptcy proceeding.