

# **AMERICAN MONEY MANAGEMENT CORPORATION**

## **Form ADV Part 2B (Brochure Supplement)**

**March 31, 2024**

### **Investment Professionals**

John B. Berding	Jason J. Maney
William P. Hogan	Thomas J. Keitel, Jr.
Chester M. Eng	David P. Meyer
Patrick J. Byrne	David J. Dickman
Jeffrey D. Goehring	Joseph A. Haverkamp
Kyle R. Dragan	Zachary A. Glutz
Matthew A. Hill	Nick Ruehlman

American Money Management Corporation  
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Cincinnati, Ohio 45202  
Phone: (513) 579-2121  
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This brochure supplement provides information about American Money Management Corporation's ("AMMC") investment professionals and supplements AMMC's brochure. You should have received a copy of that brochure. Please contact John S. Fronduti, AMMC's Chief Compliance Officer, at (513) 579-2548 if you did not receive AMMC's brochure or if you have any questions about the content of this supplement.

Additional information about AMMC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Registration with the SEC does not imply a certain level of skill or training.

## **American Money Management Corporation’s Investment Professionals/Management and Organization**

AMMC currently provides investment management services to American Financial Group, Inc. (“AFG”), an Ohio corporation and insurance holding company based in Cincinnati, Ohio, and its subsidiaries (collectively, the “Affiliated Companies”), and certain non-affiliated third-party pooled investment vehicles that are organized as private funds (the “Non-Affiliated Funds”).

### **Management of Affiliated Company Investments**

John B. Berding, President of AMMC, serves as portfolio manager for all accounts managed on behalf of the Affiliated Companies. In this capacity, Mr. Berding is responsible for establishing and managing the overall investment strategy and security selection process for the Affiliated Companies as well as directing buying and selling decisions for Affiliated Company accounts based their investment objectives. Mr. Berding meets frequently with Affiliated Company management to discuss and refine investment objectives.

Mr. Berding relies upon and seeks input from all AMMC investment professionals in connection with these relationships. This brochure supplement contains the names and biographical information regarding the officers of AMMC. The investment professionals meet regularly to assess market conditions, to review existing portfolio positions and to discuss any recommended changes to Affiliated Company portfolios. In addition, each AMMC investment professional performs day-to-day client services on behalf of the Affiliated Companies.

### **Management of Non-Affiliated Funds**

With respect to the Non-Affiliated Funds, AMMC has established a CLO Credit Committee. The CLO Credit Committee is responsible for setting strategic direction for investment decisions for the Non-Affiliated Funds, and for making material portfolio management decisions with respect to the Non-Affiliated Funds. The CLO Credit Committee also assesses the liquidity, valuation and pricing of securities held in the portfolios of the Non-Affiliated Funds, as necessary and appropriate. The CLO Credit Committee consists of two members: Chester M. Eng and David P. Meyer. Mr. Berding supervises the members of the CLO Credit Committee.

### **Investment Professional Designations**

Certain of AMMC’s investment professionals have undertaken the necessary steps to obtain various professional designations within the investment management industry. The Chartered Financial Analyst (CFA) designation is an international professional certification offered by the CFA Institute to financial analysts who complete a series of three six-hour examinations, possess a bachelor’s degree from an accredited institution (or have equivalent education or work experience) and have 48 months of qualified, professional work experience. CFA charterholders are also obligated to adhere to a strict Code of Ethics and Standards governing their professional conduct.

Requirements for becoming a Certified Public Accountant (CPA) are determined by U.S. states and jurisdictions. The education requirements generally include completing a total of 150 semester hours from a college or university whose accreditation is accepted by the jurisdiction and completing a specified number of accounting and business courses. A candidate must also pass the CPA exam and an ethics exam. Certain jurisdictions also have experience requirements prior to licensure as a CPA.

## **John B. Berding**

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

*John B. Berding* has served as President of AMMC since 2011 and has been responsible for the management of AFG's investment portfolio since 2010. Mr. Berding joined AMMC in 1987. Mr. Berding is a CPA (inactive) and earned a BBA in Accounting and Finance from the University of Cincinnati and an MBA from the University of Chicago. Mr. Berding was born in 1962.

### **Item 3: Disciplinary Information**

The disclosures required under this Item of Form ADV Part 2B are not applicable to Mr. Berding. Mr. Berding has not been the subject of any legal or disciplinary events that are material to a client's or prospective client's evaluation of Mr. Berding.

### **Item 4: Other Business Activities**

The disclosures required under this Item of Form ADV Part 2B are not applicable to Mr. Berding. Mr. Berding is not actively engaged in any investment-related business or occupation other than AMMC.

### **Item 5: Additional Compensation**

The disclosures required under this Item of Form ADV Part 2B are not applicable to Mr. Berding. Mr. Berding does not receive any economic benefit from any person who is not a client for providing advisory services. In addition, he does not receive any economic benefit for providing advisory services in excess of his salary and bonuses. He also participates in employee compensation and benefit plans, including equity incentive plans, commensurate with his position and tenure with AFG.

### **Item 6: Supervision**

John B. Berding, President of AMMC, is solely responsible for supervising all of the investment professionals in connection with the management of Affiliated Company accounts and all Non-Affiliated Funds.

The two members of the CLO Credit Committee, Messrs. Eng and Meyer, Senior Vice Presidents of AMMC, are responsible for supervising all of the investment professionals in connection with the management of the Non-Affiliated Funds, including with respect to all investment advice provided to and on behalf of the Non-Affiliated Funds.

All of those with supervisory responsibility for AMMC can be reached by telephone at (513) 579-2121.

Mr. Berding reviews the performance of all AMMC employees, including the members of the CLO Credit Committee. AMMC's compliance personnel, consisting of John S. Fronduti, Senior Vice President and Chief Compliance Officer of AMMC, is primarily responsible for monitoring all aspects of compliance at AMMC, including supervising the advisory activities of each investment professional and the members of the CLO Credit Committee. Mr. Fronduti can be reached at (513) 579-2548.

AMMC supervises employee activities at the client level through regular meetings attended by the investment professionals. At these meetings, the investment professionals review and discuss global financial and market developments and trends, the effects of current market conditions on client accounts and the future direction for client account investments.

## **Jason J. Maney, CFA**

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

*Jason J. Maney, CFA*, has served as an executive Vice President of AMMC since 2023 and a Senior Vice President of AMMC since 2011. He has also served as Co-head of Trading of AMMC, primarily responsible for trading corporate bonds, since 2011. Before joining AMMC in 2002, Mr. Maney was a senior investment associate with Ohio Casualty Corporation and a senior associate with Arthur Anderson LLP. Mr. Maney is a CPA, a CFA charterholder and earned a BBA in Accounting from Miami University (Ohio). Mr. Maney was born in 1976.

### **Item 3: Disciplinary Information**

The disclosures required under this Item of Form ADV Part 2B are not applicable to Mr. Maney. Mr. Maney has not been the subject of any legal or disciplinary events that are material to a client's or prospective client's evaluation of Mr. Maney.

### **Item 4: Other Business Activities**

The disclosures required under this Item of Form ADV Part 2B are not applicable to Mr. Maney. Mr. Maney is not actively engaged in any investment-related business or occupation other than AMMC.

### **Item 5: Additional Compensation**

The disclosures required under this Item of Form ADV Part 2B are not applicable to Mr. Maney. Mr. Maney does not receive any economic benefit from any person who is not a client for providing advisory services. In addition, he does not receive any economic benefit for providing advisory services in excess of his salary and bonuses. He also participates in employee compensation and benefit plans, including equity incentive plans, commensurate with his position and tenure with AFG.

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AMMC supervises employee activities at the client level through weekly or more frequent meetings attended by all of the investment professionals. At these meetings, the investment professionals review and discuss global financial and market developments and trends, the effects of current market conditions on client accounts and the future direction for client account investments.

## **Chester M. Eng, CFA**

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

*Chester M. Eng, CFA* has served as Senior Vice President of AMMC since 2000 and as a member of AMMC's CLO Credit Committee since 2010. Prior to joining AMMC in 1991, Mr. Eng was a fixed income portfolio manager and analyst with The Penn Central Corporation; prior to 1988, he held various financial and investment positions at CBS, Inc. Mr. Eng is a CFA charterholder and earned a BA in Economics and Political Science from the University of Rochester and an MBA from New York University's Stern School of Business. Mr. Eng was born in 1960.

### **Item 3: Disciplinary Information**

The disclosures required under this Item of Form ADV Part 2B are not applicable to Mr. Eng. Mr. Eng has not been the subject of any legal or disciplinary events that are material to a client's or prospective client's evaluation of Mr. Eng.

### **Item 4: Other Business Activities**

The disclosures required under this Item of Form ADV Part 2B are not applicable to Mr. Eng. Mr. Eng is not actively engaged in any investment-related business or occupation other than AMMC.

### **Item 5: Additional Compensation**

The disclosures required under this Item of Form ADV Part 2B are not applicable to Mr. Eng. Mr. Eng does not receive any economic benefit from any person who is not a client for providing advisory services. In addition, he does not receive any economic benefit for providing advisory services in excess of his salary and bonuses. He also participates in employee compensation and benefit plans, including equity incentive plans, commensurate with his position and tenure with AFG.

### **Item 6: Supervision**

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## **William F. Hogan, CFA**

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

*William F. Hogan, CFA*, has served as Senior Vice President of AMMC since 2009. He has also served as Co-head of Trading of AMMC, primarily responsible for trading mortgage and asset-backed securities, since 2011. Prior to joining AMMC in 1998, Mr. Hogan worked as a mortgage, asset-backed, and corporate fixed income securities registered representative at various broker-dealers, where, since 1984, he covered numerous institutional investors including insurance companies, mutual funds and banks. Mr. Hogan is a CFA charterholder and earned a BS in Finance from the University of Notre Dame. Mr. Hogan was born in 1960.

### **Item 3: Disciplinary Information**

The disclosures required under this Item of Form ADV Part 2B are not applicable to Mr. Hogan. Mr. Hogan has not been the subject of any legal or disciplinary events that are material to a client's or prospective client's evaluation of Mr. Hogan.

### **Item 4: Other Business Activities**

The disclosures required under this Item of Form ADV Part 2B are not applicable to Mr. Hogan. Mr. Hogan is not actively engaged in any investment-related business or occupation other than AMMC.

### **Item 5: Additional Compensation**

The disclosures required under this Item of Form ADV Part 2B are not applicable to Mr. Hogan. Mr. Hogan does not receive any economic benefit from any person who is not a client for providing advisory services. In addition, he does not receive any economic benefit for providing advisory services in excess of his salary and bonuses. He also participates in employee compensation and benefit plans, including equity incentive plans, commensurate with his position and tenure with AFG.

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## **Thomas J. Keitel, Jr.**

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

*Thomas J. Keitel, Jr.* has served as Senior Vice President of AMMC since 2006. Prior to joining AMMC in 1999, Mr. Keitel held various positions in AFG's Finance Department where his responsibilities included the preparation of Securities and Exchange Commission and shareholder reports and internal auditing functions. Mr. Keitel joined AFG, Inc. in 1986. Mr. Keitel earned a BSBA in Finance from Xavier University. Mr. Keitel was born in 1963.

### **Item 3: Disciplinary Information**

The disclosures required under this Item of Form ADV Part 2B are not applicable to Mr. Keitel. Mr. Keitel has not been the subject of any legal or disciplinary events that are material to a client's or prospective client's evaluation of Mr. Keitel.

### **Item 4: Other Business Activities**

The disclosures required under this Item of Form ADV Part 2B are not applicable to Mr. Keitel. Mr. Keitel is not actively engaged in any investment-related business or occupation other than AMMC.

### **Item 5: Additional Compensation**

The disclosures required under this Item of Form ADV Part 2B are not applicable to Mr. Keitel. Mr. Keitel does not receive any economic benefit from any person who is not a client for providing advisory services. In addition, he does not receive any economic benefit for providing advisory services in excess of his salary and bonuses. He also participates in employee compensation and benefit plans, including equity incentive plans, commensurate with his position and tenure with AFG.

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## **David P. Meyer**

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

*David P. Meyer* has served as Senior Vice President of AMMC since 2006 and as a member of AMMC's CLO Credit Committee since 2001. From 1990 until he joined AMMC in 1997, Mr. Meyer held various positions in AFG's Finance Department where his responsibilities included the preparation of Securities and Exchange Commission and shareholder reports and internal auditing functions. Mr. Meyer earned a BBA in Accounting from the University of Cincinnati. Mr. Meyer was born in 1967.

### **Item 3: Disciplinary Information**

The disclosures required under this Item of Form ADV Part 2B are not applicable to Mr. Meyer. Mr. Meyer has not been the subject of any legal or disciplinary events that are material to a client's or prospective client's evaluation of Mr. Meyer.

### **Item 4: Other Business Activities**

The disclosures required under this Item of Form ADV Part 2B are not applicable to Mr. Meyer. Mr. Meyer is not actively engaged in any investment-related business or occupation other than AMMC.

### **Item 5: Additional Compensation**

The disclosures required under this Item of Form ADV Part 2B are not applicable to Mr. Meyer. Mr. Meyer does not receive any economic benefit from any person who is not a client for providing advisory services. In addition, he does not receive any economic benefit for providing advisory services in excess of his salary and bonuses. He also participates in employee compensation and benefit plans, including equity incentive plans, commensurate with his position and tenure with AFG.

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## **Patrick J. Byrne**

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

*Patrick J. Byrne* was elected Senior Vice President of AMMC in 2022 and currently serves as an investment analyst focused on several specific industries. From 2006 until 2022, Mr. Byrne served in various investment-related positions at AMMC. Prior to joining AMMC in 2006, Mr. Byrne served as an Investment Analyst at Ameriprise Financial. Mr. Byrne is a CFA charterholder and earned a BBA in Finance from the University of Cincinnati. Mr. Byrne was born in 1978.

### **Item 3: Disciplinary Information**

The disclosures required under this Item of Form ADV Part 2B are not applicable to Mr. Byrne. Mr. Byrne has not been the subject of any legal or disciplinary events that are material to a client's or prospective client's evaluation of Mr. Byrne.

### **Item 4: Other Business Activities**

The disclosures required under this Item of Form ADV Part 2B are not applicable to Mr. Byrne. Mr. Byrne is not actively engaged in any investment-related business or occupation other than AMMC.

### **Item 5: Additional Compensation**

The disclosures required under this Item of Form ADV Part 2B are not applicable to Mr. Byrne. Mr. Byrne does not receive any economic benefit from any person who is not a client for providing advisory services. In addition, he does not receive any economic benefit for providing advisory

services in excess of his salary and bonuses. He also participates in employee compensation and benefit plans, including equity incentive plans, commensurate with his position and tenure with AFG.

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## **David J. Dickman**

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

*David J. Dickman* was elected Senior Vice President of AMMC in 2022. From 2001 until 2022, Mr. Dickman served in various investment-related positions at AMMC. Mr. Dickman is a CFA charterholder and earned a BSBA in Finance from Xavier University. Mr. Dickman was born in 1978.

### **Item 3: Disciplinary Information**

The disclosures required under this Item of Form ADV Part 2B are not applicable to Mr. Dickman. Mr. Dickman has not been the subject of any legal or disciplinary events that are material to a client's or prospective client's evaluation of Mr. Dickman.

### **Item 4: Other Business Activities**

The disclosures required under this Item of Form ADV Part 2B are not applicable to Mr. Dickman. Mr. Dickman is not actively engaged in any investment-related business or occupation other than AMMC.

### **Item 5: Additional Compensation**

The disclosures required under this Item of Form ADV Part 2B are not applicable to Mr. Dickman. Mr. Dickman does not receive any economic benefit from any person who is not a client for providing advisory services. In addition, he does not receive any economic benefit for providing advisory services in excess of his salary and bonuses. He also participates in employee compensation and benefit plans, including equity incentive plans, commensurate with his position and tenure with AFG.

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## **Jeffrey D. Goehring**

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

**Jeffrey D. Goehring** was elected Senior Vice President of AMMC in 2022. From 2006 until 2022, Mr. Goehring served in various investment-related positions at AMMC. Prior to joining AMMC in 2006, Mr. Goehring held various positions in the Finance Department at Great American

Financial Resources, Inc. Mr. Goehring earned a BBA in Accounting and Finance from the University of Cincinnati and an MBA from Xavier University. Mr. Goehring was born in 1977.

### **Item 3: Disciplinary Information**

The disclosures required under this Item of Form ADV Part 2B are not applicable to Mr. Goehring. Mr. Goehring has not been the subject of any legal or disciplinary events that are material to a client's or prospective client's evaluation of Mr. Goehring.

### **Item 4: Other Business Activities**

The disclosures required under this Item of Form ADV Part 2B are not applicable to Mr. Goehring. Mr. Goehring is not actively engaged in any investment-related business or occupation other than AMMC.

### **Item 5: Additional Compensation**

The disclosures required under this Item of Form ADV Part 2B are not applicable to Mr. Goehring. Mr. Goehring does not receive any economic benefit from any person who is not a client for providing advisory services. In addition, he does not receive any economic benefit for providing advisory services in excess of his salary and bonuses. He also participates in employee compensation and benefit plans, including equity incentive plans, commensurate with his position and tenure with AFG.

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## **Joseph A. Haverkamp**

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

*Joseph A. Haverkamp* was elected Senior Vice President of AMMC in 2022. From 2008 until 2022, Mr. Haverkamp served in various investment-related positions at AMMC. Prior to joining AMMC in 2008, Mr. Haverkamp was an Associate at Banc of America Securities in their Strategic Capital trading group from 2004 to 2008. Mr. Haverkamp earned a BBA in Finance and Accounting from the University of Cincinnati. Mr. Haverkamp was born in 1980.

### **Item 3: Disciplinary Information**

The disclosures required under this Item of Form ADV Part 2B are not applicable to Mr. Haverkamp. Mr. Haverkamp has not been the subject of any legal or disciplinary events that are material to a client's or prospective client's evaluation of Mr. Haverkamp.

### **Item 4: Other Business Activities**

The disclosures required under this Item of Form ADV Part 2B are not applicable to Mr. Haverkamp. Mr. Haverkamp is not actively engaged in any investment-related business or occupation other than AMMC.

### **Item 5: Additional Compensation**

The disclosures required under this Item of Form ADV Part 2B are not applicable to Mr. Haverkamp. Mr. Haverkamp does not receive any economic benefit from any person who is not a client for providing advisory services. In addition, he does not receive any economic benefit for providing advisory services in excess of his salary and bonuses. He also participates in employee compensation and benefit plans, including equity incentive plans, commensurate with his position and tenure with AFG.

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## **Kyle R. Dragan**

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

**Kyle R. Dragan** was elected Vice President of AMMC in 2018. From 2007 until 2018, Mr. Dragan served in various investment-related positions at AMMC. Mr. Dragan is a CFA charterholder and earned a Bachelor of Business Administration from the University of Cincinnati. Mr. Dragan was born in 1986.

### **Item 3: Disciplinary Information**

The disclosures required under this Item of Form ADV Part 2B are not applicable to Mr. Dragan. Mr. Dragan has not been the subject of any legal or disciplinary events that are material to a client's or prospective client's evaluation of Mr. Dragan.

### **Item 4: Other Business Activities**

The disclosures required under this Item of Form ADV Part 2B are not applicable to Mr. Dragan. Mr. Dragan is not actively engaged in any investment-related business or occupation other than AMMC.

### **Item 5: Additional Compensation**

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## **Item 6: Supervision**

John B. Berding, President of AMMC, is solely responsible for supervising all of the investment professionals in connection with the management of Affiliated Company accounts and all Non-Affiliated Funds.

The two members of the CLO Credit Committee, Messrs. Eng and Meyer, Senior Vice Presidents of AMMC, are responsible for supervising all of the investment professionals in connection with the management of the Non-Affiliated Funds, including with respect to all investment advice provided to and on behalf of the Non-Affiliated Funds.

All of those with supervisory responsibility for AMMC can be reached by telephone at (513) 579-2121.

Mr. Berding reviews the performance of all AMMC employees, including the members of the CLO Credit Committee. AMMC's compliance personnel, consisting of John S. Fronduti, Senior Vice President and Chief Compliance Officer of AMMC, is primarily responsible for monitoring all aspects of compliance at AMMC, including supervising the advisory activities of each investment professional and the members of the CLO Credit Committee. Mr. Fronduti can be reached at (513) 579-2548.

AMMC supervises employee activities at the client level through weekly or more frequent meetings attended by all of the investment professionals. At these meetings, the investment professionals review and discuss global financial and market developments and trends, the effects of current market conditions on client accounts and the future direction for client account investments.

## **Zachary A. Glutz**

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

**Zachary A. Glutz** was elected Vice President of AMMC in 2018. From 2008 until 2018, Mr. Glutz served in various investment-related positions at AMMC. Mr. Glutz is a CFA charterholder and earned a Bachelor of Business Administration from the University of Cincinnati. Mr. Glutz was born in 1987.

### **Item 3: Disciplinary Information**

The disclosures required under this Item of Form ADV Part 2B are not applicable to Mr. Glutz. Mr. Glutz has not been the subject of any legal or disciplinary events that are material to a client's or prospective client's evaluation of Mr. Glutz.



#### **Item 4: Other Business Activities**

The disclosures required under this Item of Form ADV Part 2B are not applicable to Mr. Glutz. Mr. Glutz is not actively engaged in any investment-related business or occupation other than AMMC.

#### **Item 5: Additional Compensation**

The disclosures required under this Item of Form ADV Part 2B are not applicable to Mr. Glutz. Mr. Glutz does not receive any economic benefit from any person who is not a client for providing advisory services. In addition, he does not receive any economic benefit for providing advisory services in excess of his salary and bonuses. He also participates in employee compensation and benefit plans, including equity incentive plans, commensurate with his position and tenure with AFG.

#### **Item 6: Supervision**

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## **Matthew A. Hill**

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

*Matthew A. Hill* was elected Vice President of AMMC in 2020. From 2014 until 2020, Mr. Hill served in various investment-related positions at AMMC. Prior to joining AMMC in 2014, Mr. Hill served as a Credit Risk Analyst at Bank of America Merrill Lynch within their Global Markets Risk group. Mr. Hill earned a BS in Finance from Wake Forest University. Mr. Hill was born in 1987.

### **Item 3: Disciplinary Information**

The disclosures required under this Item of Form ADV Part 2B are not applicable to Mr. Hill. Mr. Hill has not been the subject of any legal or disciplinary events that are material to a client's or prospective client's evaluation of Mr. Hill.

### **Item 4: Other Business Activities**

The disclosures required under this Item of Form ADV Part 2B are not applicable to Mr. Hill. Mr. Hill is not actively engaged in any investment-related business or occupation other than AMMC.

### **Item 5: Additional Compensation**

The disclosures required under this Item of Form ADV Part 2B are not applicable to Mr. Hill. Mr. Hill does not receive any economic benefit from any person who is not a client for providing advisory services. In addition, he does not receive any economic benefit for providing advisory services in excess of his salary and bonuses. He also participates in employee compensation and benefit plans, including equity incentive plans, commensurate with his position and tenure with AFG.

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investment professional and the members of the CLO Credit Committee. Mr. Fronduti can be reached at (513) 579-2548.

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## **Nick A. Ruehlman**

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

*Nick A. Ruehlman* was elected Vice President of AMMC in 2020 and currently serves as an investment analyst focused on several specific industries. From 2012 until 2020, Mr. Ruehlman served in various investment-related positions at AMMC. Prior to joining AMMC in 2012, Mr. Ruehlman served as a Senior Associate at The Walnut Group and Blue Chip Venture Company, two Cincinnati-based private equity firms. Mr. Ruehlman is a CFA charterholder and earned a BBA in Finance and Real Estate from the University of Cincinnati. Mr. Ruehlman was born in 1982.

### **Item 3: Disciplinary Information**

The disclosures required under this Item of Form ADV Part 2B are not applicable to Mr. Ruehlman. Mr. Ruehlman has not been the subject of any legal or disciplinary events that are material to a client's or prospective client's evaluation of Mr. Ruehlman.

### **Item 4: Other Business Activities**

The disclosures required under this Item of Form ADV Part 2B are not applicable to Mr. Ruehlman. Mr. Ruehlman is not actively engaged in any investment-related business or occupation other than AMMC.

### **Item 5: Additional Compensation**

The disclosures required under this Item of Form ADV Part 2B are not applicable to Mr. Ruehlman. Mr. Ruehlman does not receive any economic benefit from any person who is not a client for providing advisory services. In addition, he does not receive any economic benefit for providing advisory services in excess of his salary and bonuses. He also participates in employee compensation and benefit plans, including equity incentive plans, commensurate with his position and tenure with AFG.

## **Item 6: Supervision**

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