



Form ADV Part 2A Investment Adviser Brochure

December 2012

This brochure provides information about the qualifications and business practices of Checchi Capital Advisers, LLC. If you have any questions about the contents of this brochure, please contact Adam D. Checchi, Managing Member, at 310-432-0010 and/or info@chechicapital.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 Checchi Capital Advisers, LLC is also available on the SEC's website at www.adviserinfo.sec.gov.

190 North Canon Drive, Suite 402
Beverly Hills, CA 90201
310-432-0010
info@chechicapital.com
www.chechicapital.com

Item 2: Summary of Material Changes

Annual Update

This Item of the brochure is updated if material changes have occurred during the course of the Firm's fiscal year; or with the Firm's Annual Updating Amendment (ADV).

Material Changes since the Last Update

Since the last ADV filing, there are no material changes to report.

Full Brochure Available

We will provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

Currently, our Brochure may be requested by contacting Adam Checchi, Managing Partner, at 310-432-0010 or adam@chechicapital.com.

Additional information about CCA is also available via the SEC's web site www.adviserinfo.sec.gov. The SEC's web site also provides information about any persons affiliated with CCA who are registered, or are required to be registered, as investment adviser representatives of CCA.

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Item 4: Advisory Business

Firm Description

CCA is a registered investment advisor, which provides portfolio management services to individuals, trusts, foundations, corporations, and other business entities. CCA was founded in 2007.

Principal Owners

CCA is owned by Loeb Capital West, LLC (55%), Kinara Capital, LLC (25%), and Canal Capital Partners, LLC (20%).

Investment Supervisory Services

CCA provides continuous advice to clients regarding investment of client funds based on the individual needs of the client. Through personal discussions in which goals and objectives based on a client's particular circumstances are established, CCA will create and manage a portfolio based on that client's needs.

Asset Management

CCA provides sophisticated globally diversified portfolio strategies for investors' core long-term liquid equity and fixed income investments. Customized investment portfolios will be constructed using proprietary statistical and mathematical models which maximize diversification and tax efficiency while minimizing turnover, transaction costs and management expenses.

CCA's strategies are based on individually constructed domestic and foreign fixed income and equity portfolios that use statistical sampling to approximate the distribution of the world's liquid traded assets by value. The gross returns and volatility of CCA portfolios should approximate the pre-tax returns of the major world indices weighted by market capitalization. CCA will include tax optimization and transaction cost reduction algorithms that optimize the client's tax position.

Assets are invested primarily in fixed income and equity, utilizing exchange-traded funds, where appropriate, to achieve maximum diversification. All securities are purchased or sold through a brokerage account. The brokerage firm charges a fee for stock and bond trades. CCA does not receive any compensation, in any form, from fund companies or brokers.

Investments may also include: equities (stocks), warrants, corporate debt securities, certificates of deposit, municipal securities, investment company securities (variable life insurance, variable annuities, and mutual funds shares), U. S. government securities, options contracts, futures contracts, and interests in partnerships.

Tailored Relationships

CCA tailors advisory services to the individual needs of the client. The goals and objectives for each client are discussed and then an individual portfolio of domestic and foreign fixed-income and equity is constructed using a statistical sampling process to

approximate the distribution of the world's liquid traded assets by value. The gross returns and volatility of CCA portfolios should approximate the pre-tax returns of the major world indices weighted by market capitalization. CCA will include tax optimization and transaction cost reduction algorithms that optimize the client's tax position. Clients may impose restrictions on investing in certain securities or types of securities.

Wrap Fee Programs

CCA does not participate in a Wrap Fee Program.

Client Assets

CCA manages client accounts, and as of December 14, 2012, these assets totaled approximately \$190 million. All accounts are managed on a discretionary basis.

Item 5: Fees and Compensation

Compensation

The annual compensation for CCA is 1.00% of assets under management.

CCA's compensation may be negotiated based on various criteria, including, but not limited to, the size of the aggregate party portfolio size and pre-existing relationships with clients. Certain clients may pay more or less than others depending on the amount of assets, type of portfolio, or the time involved, the degree of responsibility assumed, the complexity of the engagement, special skills needed to solve problems, the application of experience and knowledge of the client's situation.

Calculation and Payment

The specific manner in which fees are charged by CCA is established in the client's written agreement with CCA. CCA will generally calculate fees on a quarterly basis, in arrears. Compensation is based on the market value of account assets at the end of the final day of the quarter. Fees for the initial partial quarter are pro-rated from the date of the account inception.

Unless CCA and the client agree that particular assets are specifically excluded from the client's account, compensation will be calculated in arrears on the total market value of all mutual funds, stocks, bonds, cash, and money market positions held in the client's investment account at the end of each calendar quarter.

Clients may elect to be invoiced directly for fees or to authorize CCA to directly debit fees from client accounts.

Other Fees

In addition to CCA advisory compensation, clients may incur certain charges imposed by third parties which include the following: brokerage commissions; custodial fees; IRA and qualified retirement fees; mutual fund fees, including advisory fees and administrative expenses, 12B-1 and sub transfer fees; and other charges required by law.

Advisory compensation earned by CCA is separate and distinct from advisory fees and expenses charged by mutual funds in which client assets may be invested. A complete description of these fees and expenses may be found in each mutual fund prospectus. The client should review all fees charged by mutual funds, CCA and others to fully understand the total amount of fees to be paid by the client.

Termination of Agreement

Either party has the right to terminate any agreement without penalty with written notice. CCA will earn fees pro-rata through the date of termination.

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

Neither CCA nor any of its Supervised Persons (employees) accepts performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

CCA does not use a performance-based fee structure because of the potential conflict of interest. Performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client.

Item 7: Types of Clients

Types of Clients

As described in Item 4, CCA is a registered investment advisor, which provides portfolio management services to individuals, foundations, trusts, corporations, and other business entities.

Account Minimums

The minimum separate account size is \$3,000,000. Accounts may be aggregated for determining the dollar value of assets. Waivers or exceptions from the minimum account requirement may be granted at the exclusive discretion of CCA.

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

Methods of Analysis

CCA combines a quantitative approach in security analysis with an index methodology to construct portfolios of securities for clients. CCA utilizes databases from several sources as input to its own statistical computer models. This quantitative processing

produces security portfolio recommendations that capture specific market level risk exposures of common and customized indices. CCA may employ fundamental, technical and behavioral data in its computer models. CCA portfolios tend to be long-term purchases, with limited turnover.

CCA's approach is not designed to capture idiosyncratic differences between companies and therefore do not provide advantage in security selection. CCA's process relies on the quality of the data it obtains, the quality of its statistical models it builds and the firm's ability to execute purchases at prices that approximate those modeled.

Investment Strategies

The primary strategy employed with client accounts is global asset allocation targeting only liquid securities. The company uses passively managed index funds or attempts to replicate passively managed benchmarks with direct securities to construct client portfolios. Unless otherwise specified by the client, portfolios are globally diversified to control the risk associated with traditional markets. CCA does not take an active role in security selection, but does make trade decisions based on a client's specific tax and risk profile.

Risk of Loss

Investing in securities involves risk of loss that clients should be prepared to bear.

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks:

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- **Inflation Risk:** When any type of inflation is present, a dollar next year will not buy as much as a dollar today, because purchasing power is eroding at the rate of inflation.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.

- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

CCA reserves the right to advise clients on any other type of investment that it deems appropriate based on the client's stated goals and objectives. CCA may also provide advice on any type of investment held in a client's portfolio at the inception of the advisory relationship or on any investment on which the client requests advice.

Item 9: Disciplinary Information

Legal and Disciplinary

CCA and its employees have not been involved in legal or disciplinary events related to past or present investment clients.

Item 10: Other Financial Industry Activities and Affiliations

Financial Industry Activities

CCA is not registered as a broker-dealer, and none of its management persons are registered representatives of a broker-dealer.

Neither CCA nor any of its management persons is registered as (or associated with) a futures commissions merchant, commodity pool operator, or a commodity trading advisor.

Neither CCA nor any of its management persons have a material relationship or arrangement with any related person or financial industry entities.

Investment Adviser – Checchi Capital Fund Advisers, LLC

CCA is under common control with Checchi Capital Fund Advisers, LLC, (CCFA) a registered investment adviser, which provides portfolio management services to investment companies registered under the Investment Company Act of 1940.

Other Investment Advisors

CCA does not recommend or select other investment advisors for its clients.

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

Code of Ethics

CCA employees must comply with a Code of Ethics and Statement for Insider Trading. The Code describes the Firms' high standard of business conduct, and fiduciary duty to its clients. The Code's key provisions include:

- Statement of General Principles
- Policy on and reporting of Personal Securities Transactions
- A prohibition on Insider Trading
- Restrictions on the acceptance of significant gifts
- Procedures to detect and deter misconduct and violations
- Requirement to maintain confidentiality of client information

Kathryn D. Checchi, Chief Compliance Officer reviews all employee trades each quarter. Her trades are reviewed by the Managing Partner, Adam D. Checchi. These reviews ensure that personal trading does not affect the markets, and that clients of CCA receive preferential treatment.

All employees of CCA must acknowledge the terms of the Code of Ethics at least annually.

Clients and prospective clients can obtain a copy of CCA's Code of Ethics by contacting the Chief Compliance Officer, Kathryn D. Checchi, at 310-432-0010.

Participation or Interest in Client Transactions

Neither CCA nor its employees recommend to clients or buy or sell for client accounts, securities in which they have a material financial interest.

Participation or Interest in Client Transactions – Personal Securities Transactions

CCA and its employees may buy or sell securities identical to those recommended to clients for their personal accounts. These trades may not occur ahead of client trades. The Code of Ethics, described above, is designed to assure that the personal securities transactions, activities and interests of the employees of CCA will not interfere with (i)

making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code certain classes of securities have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of CCA's clients. In addition, the Code requires pre-clearance of many transactions, and restricts trading in close proximity to client trading activity. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee. Employee trading is continually monitored under the Code of Ethics, and to reasonably prevent conflicts of interest between CCA and its clients.

Participation or Interest in Client Transactions – Aggregation

CCA's employees, who are clients of the firm, may trade in the same securities with client accounts on an aggregated basis.

Item 12: Brokerage Practices

Research and Other Soft Dollar Benefits

CCA does not receive soft dollar benefits other than execution from broker/dealers in connection with client securities transactions. See disclosure below in "Directed Brokerage – Other Economic Benefits".

Brokerage for Client Referrals

CCA does not receive client referrals from broker/dealers.

Directed Brokerage

If the client requests CCA to arrange for the execution of securities brokerage transactions for the client's account, CCA shall direct such transactions through broker-dealers that CCA reasonably believes will provide best execution. CCA shall periodically and systematically review its policies and procedures regarding recommending broker-dealers to its client in light of its duty to obtain best execution.

CCA generally recommends that clients establish institutional brokerage accounts with Charles Schwab & Co., Inc. (Schwab) or Fidelity Investments, LLC (Fidelity), both registered broker-dealers and members of the Securities Investor Protection Corporation (SIPC), to maintain custody of clients' assets and to effect trades for their accounts.

Directed Brokerage – Other Economic Benefits

CCA is independently owned and operated and not affiliated with any broker-dealer. However, CCA does utilize third-party broker-dealers to access institutional trading and custody services on its clients' behalf, which are typically not available to retail investors. These services generally are available to independent investment advisors

on an unsolicited basis, at no charge to them so long as a total of at least \$10 million of the advisor's clients' assets is maintained in accounts at the broker-dealer, and are not otherwise contingent upon CCA committing to the broker-dealer any specific amount of business (assets in custody or trading). Brokerage services include brokerage, custody, research, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

For CCA's client accounts maintained in its custody, Schwab and Fidelity generally do not charge separately for custody but are compensated by account holders through commissions or other transaction-related fees for securities trades that are executed through Schwab or Fidelity, or that settle into Schwab or Fidelity accounts.

Clients may come to CCA with an existing brokerage relationship and direct CCA to execute their trades through that broker. CCA retains the right not to trade with a particular broker/dealer. Clients normally negotiate their commission rate directly with their broker. CCA will not seek better execution services or prices from other brokers or dealers and as a result, client could pay higher commissions, other transaction costs, greater spreads, or receive less favorable net prices on transactions for client's account than would otherwise be the case. If a client does not have an existing relationship with a broker, CCA may suggest the use of and request the client to authorize discretion on an account established through a variety of brokerage firms.

Trade Aggregation

CCA typically aggregates trades for multiple accounts. Orders for the same security entered on behalf of more than one client will generally be aggregated in the best interests of all participating clients. If the order is filled at different prices during the day, the prices are averaged for the day so that all participating accounts receive the same price. If an order has not been filled completely so that there are not enough shares to allocate among all the clients equally, shares will be allocated in good faith, based on a random selection process.

CCA's allocation procedure seeks to be fair and equitable to all clients with no particular group or client(s) being favored or disfavored over any other clients.

Accounts for CCA's employees, who are clients of the firm, may be included in a block trade with client accounts.

Item 13: Review of Accounts

Reviews

Adam D. Checchi, Managing Partner, is the primary Portfolio Manager. He and his team have the responsibility to manage the portfolio in accordance with the client's investment objectives and constraints. This management process includes on-going oversight of the portfolio's investments, buying and selling securities, and

communication with clients. Each investment account is reviewed at least monthly. More often reviews may be conducted on an as-needed and/or predetermined basis as agreed between the client and CCA.

Review Triggers

Other conditions that may trigger a review are material market events, or changes in political or economic conditions, tax laws, and changes in a client's personal situation.

Reporting

Each month, the broker-dealer provides clients with an account statement for each client account, which may include individual holdings, cost basis information, deposits and withdrawals, securities transactions, accrued income, dividends, performance and fees, if applicable. In addition to the monthly report, the broker-dealer provides clients with trade confirmations for each position bought and sold.

CCA also provides clients with a quarterly report including an account appraisal that identifies the current status of the portfolio. A performance summary is also provided for the portfolio during the most recent quarter and year-to-date, as well as a performance snapshot of the investable universe year-to-date for comparison purposes.

Client meetings are encouraged and are scheduled as specific situations dictate.

Item 14: Client Referrals and Other Compensation

Compensation – Economic Benefits

As described in Item 12, CCA may recommend that clients establish brokerage accounts with the either Schwab or Fidelity, both FINRA-registered broker-dealers, members SIPC, to maintain custody of clients' assets and to effect trades for their accounts. Although CCA may recommend that clients establish accounts at certain broker-dealers, it is the client's decision to use a particular broker-dealer. CCA is independently owned and operated and not affiliated with any broker-dealer.

Third-party broker-dealers make available to CCA other products and services that benefit CCA but may not benefit its clients' accounts. Some of these other products and services assist CCA in managing and administering clients' accounts. These include software and other technology that provide access to client account data (such as trade confirmations and account statements); facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts); provide research, pricing information and other market data; facilitate payment of CCA's fees from its clients' accounts; and assist with back-office functions, record keeping and client reporting. Many of these services generally may be used to service all or a substantial number of CCA's accounts, including accounts not maintained at the broker-dealer.

Third-party broker dealers also makes available to CCA other services intended to help

CCA manage and further develop its business enterprise. These services may include consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, and marketing. In addition, the broker-dealer may make available, arrange and/or pay for these types of services rendered to CCA by independent third parties. The broker-dealer may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to CCA. CCA endeavors to act in its clients' best interests. CCA's recommendation that clients maintain their assets in accounts at a particular broker-dealer may be based in part on the benefit to CCA of the availability of some of the foregoing products and services and not solely on the nature, cost or quality of custody and brokerage services provided by the broker-dealer, which may create a potential conflict of interest.

Compensation – Client Referrals

CCA has been fortunate to receive client referrals over the years. The referrals came from current clients, estate planning attorneys, accountants, employees, personal friends of employees and other similar sources. CCA does not compensate referring parties for these referrals.

Item 15: Custody

Custody – Fee Debiting

Clients may authorize CCA (in the client agreement) to debit fees directly from the client's account at the broker dealer, bank or other qualified custodian (custodian). Client investment assets will be held with a custodian agreed upon by the client and CCA. The custodian is advised in writing of the limitation of CCA's access to the account. The custodian sends a statement to the client, at least quarterly, indicating all amounts disbursed from the account including the amount of advisory fees paid directly to CCA.

Custody – Account Statements

As described in Item 13, clients receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains client's investment assets. Clients are urged to carefully review such statements and compare such official custodial records to the account statements or other reports that CCA provides. CCA statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Item 16: Investment Discretion

Discretionary Authority for Trading and Limited Power of Attorney

Through the investment management agreement, CCA may accept limited power of attorney to act on a discretionary basis on behalf of clients. A limited power of attorney allows CCA to execute trades on behalf of clients.

When such limited powers exist between the CCA and the client, CCA has the authority to determine, without obtaining specific client consent, both the amount and type of securities to be bought to satisfy client account objectives. Additionally, CCA may accept any reasonable limitation or restriction to such authority on the account placed by the client. All limitations and restrictions placed on accounts must be presented to CCA in writing.

Item 17: Voting Client Securities

Proxy Voting

CCA may vote proxies for securities over which it maintains discretionary authority consistent with its proxy voting policy.

Upon execution of the client Agreement, the client elects to:

- Assign the responsibility for voting all proxies solicited by issuers of securities held in the Portfolio to CCA, or
- Retain the responsibility for voting all proxies solicited by issuers of securities held in the Portfolio. See disclosures above regarding proxies voted by clients.

When the responsibility to vote proxies has been assigned to CCA, the firm, consistent with its passive strategy, has a policy of voting with management's recommendation.

Clients may direct CCA's vote; direction must be received in writing.

Clients may contact Kathryn D. Checchi, Chief Compliance Officer at CCA at 310-432-0010 for information about CCA's Proxy policies. Clients may also request information about how CCA voted any proxies on behalf of their account(s).

Item 18: Financial Information

CCA has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.

CCA is not required to provide a balance sheet; CCA does not require prepayment of fees of more than \$1,200 per client, **and** six months or more in advance.



Form ADV Part 2B

Investment Adviser Brochure Supplement

Supervisor: Adam D. Checchi

Supervisor of:
Kathryn D. Checchi
Samuel T. Pfister
Wes Gallup

December 2012

This brochure supplement provides information about the Firm's Supervised Persons that supplements the Checchi Capital Advisers, LLC's brochure. You should have received a copy of that brochure. Please contact Adam Checchi, Managing Member if you did not receive Checchi Capital Advisers, LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about the Firm's Supervised Persons is also available on the SEC's website at www.adviserinfo.sec.gov.

190 N. Canon Drive, Suite 402
Beverly Hills, CA 90210
310-432-0010
info@chechicapital.com
www.chechicapital.com

Educational Background and Business Experience

Education and Business Background

CCA requires that advisers in its employ have a bachelor's degree and work experience that demonstrates their aptitude for investment management. In addition, advisers in its employ may have further coursework demonstrating knowledge of financial planning and tax planning. Examples of acceptable coursework include: an MBA, a CFP®, a CFA, a ChFC, JD, CTFA, EA or CPA.

Supervisor

Adam D. Checchi

Adam has been the Managing Partner of CCA since its inception in 2007, supervising and coordinating all aspects of operations, trade execution and marketing, with specific focus on fixed income trading, product development and direct sales.

Prior to CCA, his investment experience includes: Investment Management and Private Equity Consultant from 2005 to 2007, Associate, Investment Banking Division, Goldman Sachs and Co. from 2003 to 2005, and Senior Analyst, Venture Capital, Entertainment Media Ventures, LLC from 2000 to 2001.

Adam is a 1999 graduate of Harvard University. He received a Master's of Business Administration from Harvard Business School in 2003 and was recognized as a Baker Scholar. He was also the recipient of the Loeb Award given for the most outstanding performance in finance. Adam holds the NASAA Series 65. Adam was born in 1977.

Supervised Persons

Kathryn D. Checchi

From its inception in 2007, Kathy has served as Chief Compliance Officer for CCA, overseeing all aspects of SEC compliance for the firm. She is also actively involved in marketing strategy and human resources.

Prior to CCA, Kathy was and continues to be the Manager of Checchi Capital, LLC, since 2005 and is a Principal, focusing on asset management and tax strategy for Checchi Family Interests from 1992 to 2005.

Kathy holds a BA from University of California, San Diego, an MA from Harvard University, and a JD from Georgetown University. She is a member of the District of Columbia and Texas Bars and holds the NASAA Series 65. Kathy was born in 1950.

Samuel T. Pfister

As Director of Engineering, Sam develops and maintains proprietary statistical software tools to enable an efficient, accurate and customizable portfolio construction process. He also oversees the design and maintenance of the firm's data and trading software systems.

Before joining CCA, Sam was a postdoctoral researcher at the California Institute of Technology and a technical lead in the government-sponsored DARPA Grand Challenge autonomous vehicle competition. Sam was a doctoral student at Caltech from 2000 to 2006, earning his Ph.D. for development of algorithms to enable robust statistical sensor processing in robotic applications. From 2003 to 2004, Sam took time away from graduate school to work on the Mars Exploration Rover mission run by NASA's Jet Propulsion Laboratory. During operations, he developed tools and techniques to more accurately model uncertainty in the state of the rovers to reduce risk and improve overall operational efficiency.

Sam received a Bachelor's of Science degree from Harvard University in 1999. He received a Master's of Science degree in 2001 and a Ph.D. in Mechanical Engineering in 2006 from the California Institute of Technology. Sam was born in 1977.

Wes Gallup

As Director of Operations for Checchi Capital Advisers, LLC (CCA), Wes oversees all aspects of the business operations, including client relations, portfolio maintenance, equity and fixed income trading and product development.

Prior to joining CCA in 2009, Wes was a Portfolio Manager at Eden Capital Management where he developed complex proprietary algorithms used to evaluate potential investments in the financial sector. Wes began his career at Lazard Freres & Co, where he worked on mergers, acquisitions and restructuring transactions in the energy, industrial, maritime and airline sectors.

Wes received both a Bachelor in Business Administration and a Master in Professional Accounting from the Red McCombs School of Business at the University of Texas at Austin. Wes was born in 1982.

Disciplinary Information

Disciplinary Information

Neither CCA nor any Supervised Persons have been involved in any activities resulting in a disciplinary disclosure.

Other Business Activities

Other Business Activities

As disclosed in Form ADV Part 2A Item 10 – Other Financial Industry Activities and Affiliations, neither CCA nor any supervised person is actively engaged in any outside business activities.

As disclosed in Form ADV Part 2A Item 6 – Performance-based Fees and Side-by-Side Management, neither CCA nor any supervised persons receive commissions, bonuses or other compensation based on the sale of securities or other investment products.

Additional Compensation

No Supervised Person receives any economic benefit outside of regular salaries or bonuses related to amount of sales, client referrals or new accounts, except as described in Form ADV Part 2A, Item 12.

Supervision

Supervision

Adam D. Checchi, Managing Partner, supervises all persons named in this Form ADV Part 2 Investment Adviser Brochure Supplement. All supervised persons are in one location, the principal offices of CCA. Staff, investment, marketing, and ad hoc meetings are held at this location on a regular basis. Client reports and e-mails are reviewed and discussed regularly. Trading for client accounts is planned and discussed prior to execution. Mr. Checchi may be reached at 310-432-0010.