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C A P I T A L

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INVESTMENT STEWARDSHIP



*Fiduciary
Investment
Management*
A better way
to manage assets
and safeguard
your goals.



Welcome to Cloud Capital.

Cloud Capital is a federally registered investment advisor specializing in fiduciary investment management, oversight, and consulting. Our experience includes asset management of mutual funds, collective trusts, and separately managed accounts for institutions and individuals nationwide.

Client-centered focus; performance-driven results

We exist to help our clients achieve their long-term financial goals and maximize their economic potential. In order to successfully execute our mission, we employ the following principles:

We accept responsibility as fiduciaries for our clients' investment outcomes. This means that we are duty-bound to represent our clients' best interests at all times. Our investment processes are all designed around the highest fiduciary standards, extreme diversification, constant oversight, and almost complete elimination of return-reducing "middle men" and other intermediar-

ies. Furthermore, we do not accept compensation from commissions, transactions, or any third party. We work exclusively for our clients; our duty and loyalty is solely to our clients, and we are paid only by those clients, not by any third-party.

We reject the investment industry "status quo".

For over twenty years, our firm has proactively sought out better solutions for investment strategy, transaction execution, asset custody, and all of the other elements that support our clients. The proprietary systems that we have developed as well as strong partnerships with leading service providers enable us to deliver client-centered, performance driven investment strategies and extremely

high service standards at a fraction of the industry's normal cost.

Confident leadership: It is easy to look like a hero when markets go up. However, it takes a true professional to successfully navigate the waters when storms are raging. Cloud Capital maintains full-time discretionary control of client accounts. We make changes in real-time as conditions dictate that are consistent with our clients' long-term investment policy and best interests. Frequently, this means making tough decisions. To do so, we rely on time tested investment principles that are combined with the courage to evolve and adapt during unusual circumstances.

Serve the greater good. We believe that the creation and preservation of wealth represents a means not an end. Each of us has a reason to save money and invest for the future. Whether it is our family, retirement, a charitable interest, etc., wealth is simply a tool that enables the pursuit of a greater purpose. By understanding the specifics of each client's greater purpose, we are better able to develop a living plan that accomplishes their objectives and changes with them over time.

Investment Philosophy

Our investment philosophy is rooted in the belief that indexes are the most efficient way of capturing domestic equity returns and that a combination of indexing and active management yields the best results in international equities, as well as domestic and international fixed income asset classes.

Enhanced Indexing: We utilize proprietary strategies to enhance the diversity of typical U.S equity indexes. Our strategy maintains exposure to all of the stocks in each index, but has the ability to modify the weight of each stock within the index as well as the allocation to the specific industry groups that comprise each index.

Depending on the client's risk profile and specific needs as defined by their Investment Policy Statement, we will select an approach that maintains a market neutral asset allocation or one that increases or decreases various risks, while maintaining compliance with an overall asset allocation policy. This process is completely customizable for each client.

Individual Investors

We provide affluent individuals with innovative, customized portfolio management based on our proprietary portfolio theory and risk management strategies. We partner with clients and their financial advisors to preserve and grow their wealth over the long term. Each client is at the center of a unique investment plan that may be customized to manage specific financial issues, existing holdings, or unique risk exposures.

All of our services to individuals are delivered from a fully discretionary perspective. In other words, we agree with the client regarding the overall plan, investment strategy, risk budget, economic needs, and return expectations. Then, we execute the plan in its entirety. We handle all trading, tax management, reporting, etc. on a full service basis and without pestering the clients with phone calls for authorization. The client receives monthly statements and has real-time, daily access to their account.

ERISA Plan Services

Vendor Searches - We draft and execute RFPs for recordkeeping and custody of ERISA plans, institutional clients, and high net worth individuals.

Investment Manager Searches - Completely independent searches that include mutual funds, collective funds, and separate account managers.

Fiduciary Investment Program - We operate numerous investment pools at pure cost for use by our clients. We have found that plan sponsors, investment committee members, and individual clients appreciate the complete transparency and fiduciary best practices that we deliver in these investment pools. Their chief advantage is that they are uncompromised by hidden fees, soft dollars, and other conflicts of interests that are common in traditional mutual funds.

Policy Creation / Administration - We draft and administer investment policy statements, fiduciary procedures, and ongoing monitoring / remediation of existing policies.



We intend to change
the world of
investing one
client at a time.



Cloud Capital is actively seeking new team members in key areas. We are interested in finding the right people to help us change the industry and truly create a standard of SERVICE that puts the client's interests first. We are currently expanding our organization and plan to add several new offices in major markets nationwide. The location of the offices will be determined by where we find the right PEOPLE, not by geography or regional economic demographics.

If you join our team, you will enjoy:

- Full family health insurance
- 401k program with 10% company match
- Excellent working conditions that include participation on our Investment Committee, ongoing training and business development programs, and a stable future

NOTE: We believe in long-term relationships. We do not pay "up-front" signing bonuses that would force us to charge egregious fees to your clients. We do offer a retirement bonus payment program that is based on your practice revenue and is paid for several years during your retirement.

We have opportunities in ERISA consulting and private wealth management. We are not a sales based organization and we have no broker-dealer affiliation. We offer investment advisory services, fee-based asset management, fiduciary consulting / auditing, etc. The descriptions below characterize the basic criteria that a Cloud Capital candidate must meet. If they describe you, we want to talk!

Private Wealth Management

The current brokerage industry model is very BROKEN. Most registered reps know this and are searching for a smarter, more cost-effective, and client-friendly way of providing their value-added services to their clients. We have been developing a completely unique service model for over twenty years and we know that the time is right

to share it. In most cases, your clients will pay 35% - 50% less in total investment costs under our program - and you will still make as much or more than you do currently. If you meet the requirements below, we would like to show you how this can happen!

- Do you have an excellent regulatory and compliance track record?
- Have you earned the AIFA / AIF credential? (We will provide training as a prerequisite for an otherwise successful candidate.)
- Are you a seasoned industry professional with a strong, relationship oriented client base
- Is your practice already fee-based? Are you ready to convert to a fee-based practice?
- Are you driven by a burning desire to "do the right thing"?

ERISA Services

Most of our best ideas have been developed in the ERISA marketplace. We have refined numerous cutting edge programs that simplify the fiduciary process for 401k Investment Committees, defined benefit plan sponsors, human resources teams, etc. Our programs are already in place serving small company plans as well as those of large, publicly traded plan sponsors. We are seeking individuals who:

- Have a strong working knowledge of ERISA
- A background serving ERISA clients (plan sponsors, investment committees, etc.)
- Have earned the AIFA / AIF credential (We will provide training as a prerequisite for an otherwise successful candidate.)
- Are ready to walk away from hidden fees, compensation from 12b-1, sub T/A, etc.
- Would like to see plan participants retire with as much financial security as the 401k plan's advisors

