



## STARK CAPITAL MANAGEMENT

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### Item 1 – Cover Page

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This wrap fee program brochure provides information about the qualifications and business practices of Stark Capital Management. If you have any questions about the contents of this Brochure, please contact us at the number above. 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.

Atlanta Capital Group is a Registered Investment Advisor. Registration of an Investment Advisor does not imply any level of skill or training. This Brochure is designed to provide information that can be used to make a determination to hire or retain an Advisor.

Additional information about Atlanta Capital Group is available on the SEC's website at [www.advisorinfo.sec.gov](http://www.advisorinfo.sec.gov).

## **Item 2 – Material Changes**

This is an initial wrap fee program brochure. As such, there are no material changes to report. Additional information about Stark Capital Management, LLC and Atlanta Capital Group is also available via the SEC's website, [www.advisorinfo.sec.gov](http://www.advisorinfo.sec.gov). The SEC's website also provides information about persons affiliated with Stark Capital Management, LLC and Atlanta Capital Group who are registered, or are required to be registered, as investment advisor representatives of Atlanta Capital Group.

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## Item 4 – Services, Wrap Fees, and Compensation

Atlanta Capital Group D/B/A Stark Capital Management, LLC (“SCM”) provides portfolio management services to individuals, corporations and business entities, pension and profit-sharing plans, foundations, endowments, and estates and trusts.

### ***Stark Wrap Program***

SCM and their advisors may manage your accounts through various account structures available through a platform accessible through Fidelity Institutional Wealth Services (“FIWS”). For these accounts, FIWS provides custody, transaction and banking services.

The Stark Wrap Program accounts are typically managed on a discretionary basis, meaning that your advisor has discretion over what securities to buy and sell. However, you may have your account managed on a non-discretionary basis, meaning that you must consent to each trade in the account. This trading discretion and any limitations on it will be set forth in your client agreement. The services provided are the same regardless of the account structure selected. In each account structure, your advisor may manage and provide advice on mutual funds, stocks, bonds, exchange traded funds (ETFs), LPs, and options. All of the account structures give your advisor the ability to customize asset allocation, investment selection, and investment strategies to meet your financial situation and investment goals.

The Stark Wrap Program accounts are offered as a wrap fee program under which the client pays a single fee that covers your advisor’s advice and the execution of transactions through FIWS.

Several factors may influence the selection of the account structure, including but not limited to:

- the client’s preference for a —wrap vs. transaction charges per trade on certain or all securities
- account size
- anticipated trading frequency
- anticipated securities to be traded
- management style
- long term investment goals

The services that SCM provides under some or all of these investment options may be available from other providers for lesser fees. In addition, you may buy securities (e.g., mutual funds, exchange-traded funds, etc.) outside of our investment programs without incurring fees through our program. Clients should consider the value of services provided by SCM when making such comparisons. A non-wrapped pricing arrangement may be more cost effective for Accounts that do not experience frequent trading activity.

The Stark Wrap Program account is potentially suitable for accounts in which the Investment Adviser Representative anticipates primarily investing in stocks/ETFs, and/or for clients that do not wish to pay transaction charges for trades. Stark Wrap Program accounts are custodied with FIWS.

The basic fee schedule for the Stark Wrap Program account is as follows:

<b>Asset Class</b>	<b>Annual Wrap Fee Rate</b>
Equities	1.25% per year
Fixed Income	0.50% per year
ETFs (Equity Traded Funds)	0.25% per year

The Wrap Fee covers the advisory services provided by the SCM Advisor, execution of transactions through FIWS, and custodial services provided by FIWS.

For the majority of Stark Wrap Program accounts, fees are payable quarterly or monthly in advance and automatically deducted from the account pursuant to the advisory agreement and not billed separately to you. Clients have the option of choosing monthly or quarterly billing; this election will be made on the applicable fee agreement. Refund of fees that are paid in advance will be prorated to the date of termination, and any unearned portion will be refunded back to you.

The client may terminate their account. If the account is closed during the first quarter, the termination fee will be \$25 multiplied by the number of transactions in the account. If the account is closed during the second quarter, the termination fee will be \$20 multiplied by the number of transactions in the account. If the account is closed during the third quarter, the termination fee will be \$15 multiplied by the number of transactions in the account. If the account is closed in the fourth quarter, the termination fee will be \$10 multiplied by the number of transactions in the account. A termination fee will not be charged if no services were rendered or no trades were placed, or if the account is terminated within 5 business days of account opening. Detailed information on the termination terms and fees can be found in the applicable advisory agreement.

The fee charged does not cover other broker-dealer and custodian fees, costs and compensation. Other costs that may be assessed by broker-dealers or the custodian and that are not included in the Wrap Fee include: fees for transactions executed away from FIWS, dealer mark-ups and spreads paid to market-makers. The Management Fee also does not cover debit balances or related margin interest, "mark-ups" and "mark-downs" or "dealer spreads" that broker-dealers (including broker dealer affiliates) may receive when acting as principal in certain transactions, brokerage commission or other charges resulting from transactions not effected through FIWS. The Management Fee also does not cover costs associated with exchanging foreign currencies, odd-lot differentials, IRA fees, transfer taxes, exchange fees, wire transfer fees, extensions, non-sufficient funds, mailgrams, legal transfers, bank wire charges, postage fees or SEC fees or other fees or taxes required by law.

## ***ACCOUNT TERMINATION***

The client and/or the firm may initiate termination of the contract at any time by sending written notice to the contra party and will be accepted the day that it is received by the contra party. Client and/or the firm may initiate termination of the contract at any time by sending written notice to the contra party and will be accepted the day that it is received by the contra party. A termination fee may apply if the account is terminated within the first year of the advisory contract; however, a full refund will be provided without penalty if the client terminates the contract within 5 business days of signing with the firm. For the purposes of this provision, a contract is considered entered into when all parties to the contract have signed the contract, or in the case of an oral contract otherwise signified their acceptance, any other provisions of this contract notwithstanding.

If you instruct SCM to terminate your advisory contract and liquidate your account, we will proceed with liquidation of your account in an orderly and efficient manner. There will not be a charge by us for such redemption; however, you should be aware that certain mutual funds impose redemption fees as stated in each company's fund prospectus in certain circumstances. Clients must keep in mind that the decision to liquidate security issues or mutual funds may result in tax consequences that should be discussed with the client's tax advisor. Factors that may affect the orderly and efficient manner would be size and types of issues, liquidity of the markets, and market makers' abilities. Should the necessary securities' markets

be unavailable and trading suspended, efforts to trade will be done as soon as possible following their reopening. Due to the administrative processing time needed to terminate client's investment advisory service and communicate the instructions to client's Investment Advisor, termination orders received from clients are not market orders; it may take several business days under normal market conditions to process the client's request. During this time, the client's account is subject to market risk. SCM and its agent are not responsible for market fluctuations of the client's account from time of written notice until complete liquidation. All efforts will be made to process the termination in an efficient and timely manner.

## **Item 5 – Account Requirements and Types of Clients**

Certain Investment Advisors may not be available to certain Clients because of minimum Account sizes, wrap fee schedules, geographic availability, or other factors. Unless otherwise noted herein, the minimum account size is \$250,000 for wrap fee-based Accounts. Account minimums may be waived with approval and at the discretion of a supervisor.

Please see the discussion under Item 4, above, for additional information on Account Requirements and Types of Clients.

## **Item 6 – Portfolio Manager Selection and Evaluation**

### ***Advisory Business***

SCM serves as the Portfolio Manager for the Stark Wrap Fee Programs. SCM may outsource its portfolio management by using outside portfolio managers. SCM uses industry standards to measure the performance of its Portfolio Managers; however, it does not use a third party auditor to review or verify the performance of its Portfolio Managers.

SCM provides advisory services, giving continuous advice based on the client's individual needs. Through personal discussions in which goals and objectives based upon the client's personal objectives are established, the Financial Advisor will develop a personal investment policy based upon the client's goals and objectives and will manage the portfolio according to the criteria.

Each client has the ability to impose reasonable restrictions on the management of his/her account, including the designation of particular securities or types of securities that should not be purchased for the account, or that should be sold if held in the account. If a client's instructions are unreasonable or an Investment Advisor Representative believes that the instructions are inappropriate for the client, SCM will notify the client that, unless the instructions are modified, it may cancel the instructions in the client's account. A client will not be able to provide instructions that prohibit or restrict the Investment Adviser of an open-end or closed-end mutual fund or ETF with respect to the purchase or sale of specific securities or types of securities within the fund.

Advisory services are tailored to the individual needs of each client. Your advisor will assist you in connection with establishing and monitoring of investment objectives, risk tolerance, asset allocation goals and time horizon. You have the opportunity to place reasonable restrictions or constraints on the way your accounts are managed; however, such restrictions may cause your advisor to deviate from a strategy or recommendations that your advisor would have made if such restrictions or constraints were not in place. Thus, the account's performance may be lower than it otherwise would have been.

A portion of the Wrap Fee is paid to SCM for advisory services and portfolio management services; a portion of the Wrap Fee covers transaction costs and is paid to Fidelity. Since SCM pays for transaction

fees from the Wrap Fee, there is an incentive to limit trading in order to avoid paying transaction fees. Our supervisory process includes a review of accounts to ensure that trading activity is suitable based on the client's investment objectives.

Please see the discussion under Item 4, above, for additional information on Stark Capital Management's Portfolio Manager Selection and Evaluation.

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

Stark Capital Management does not charge any performance-based fees (fees based on a share of the realized capital gains) and does not participate in side-by-side management.

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

Our investment strategy begins with an understanding of a client's financial goals. Advisors use demographic and financial information provided by the client to assess the client's risk profile and investment objectives in determining an appropriate plan for the client's assets. Investment strategies ordinarily include long- or short-term purchases of stock portfolios, mutual funds and fixed income securities.

Investment recommendations are based on an analysis of the client's individual needs, and are drawn from research and analysis. Security analysis methods may include the following:

- Fundamental analysis: We attempt to measure the intrinsic value of a security by looking at economic and financial factors to determine if the company is underpriced or overpriced. Fundamental analysis does not attempt to anticipate market movements. This presents a potential risk, as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the stock.
- Technical analysis and charting: We attempt to determine the trend of a security by studying past market data, including price and volume. This presents a potential risk, as the price of a security can change directions at any time and past performance is not a guarantee of future performance.
- Cyclical analysis: We attempt to identify the industry cycle of a company to determine whether the company is in a market introduction phase, growth phase or maturity phase. Generally projected revenues, growth potential and business risk may fluctuate based on the company's cycle stage.

Information for this analysis may be drawn from financial newspapers and magazines, research materials prepared by others, annual reports, corporate filings, prospectuses, company press releases and corporate ratings services.

It is important to note that investing in securities involves certain risks that clients should be prepared to bear. Though the goal of the firm is to find quality investments and proper allocation strategies, there is no guarantee that the goal will be met, and/or that the value of investor portfolios may not decline in value during any given time period. For any risks associated with Investment Company products, please refer to the prospectuses for additional details about these risks. Our investment approach constantly keeps the risk of loss in mind. These risks include, but are not limited to:

- 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 today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- **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.

### ***Voting Client Securities***

As a matter of firm policy and practice, SCM does not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. SCM may provide advice to clients regarding the clients' voting of proxies. Clients will receive their proxies or other solicitations directly from their custodian or transfer agent.

### **Item 7 – Client Information Provided to Portfolio Managers**

Stark Capital Management may act as both your registered investment adviser and your portfolio manager. In those instances, your Portfolio Manager has the same access to your financial information as SCM. Your financial information includes, among other things, information on your income, net worth, and investment objectives. Your Portfolio Manager uses this information to determine an appropriate asset allocation for you and to manage your investments. When you update your information with SCM, your Portfolio Manager will have immediate access to the same updated information.

SCM may outsource its portfolio management by using outside portfolio managers. The third party manager generally requires clients to complete an investment profile questionnaire upon account opening. Clients should inform SCM and the third party money manager (if applicable) in writing of any material changes in the Client's investment objectives that might affect the manner in which Client's assets should be invested.

The Client may contact SCM during normal business hours to consult with their adviser concerning the management of the Client's Account. Please see the discussion under Items 4 and 6, above, for additional information regarding Client Information Provided to Portfolio Managers.



## **Item 8 – Client Contact with Portfolio Managers**

You may communicate with Portfolio Managers directly. Consultations beyond normal business hours may require additional negotiated fees.

Please see the discussion under Items 4, 6, and 7 above, for additional information on Client Contact with Portfolio Managers.

## **Item 9 – Additional Information**

### ***Disciplinary Information***

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of SCM or the integrity of management. SCM has no information applicable to this Item.

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

Certain SCM personnel are also registered representatives of a broker/dealer, such as Triad Advisors or Western International Securities, Inc. In that capacity, they may be paid commissions, brokerage fees, 12b-1 fees or other fees or payments for their brokerage clients, which may include clients who are also clients of SCM. These arrangements pose a conflict of interest for those individuals to the extent they have a financial incentive to recommend such sales or other transactions to the client.

Clients may purchase securities through broker-dealers in initial public offerings, secondary offerings and special purpose acquisition company transactions. SCM may act as a member of the selling syndicate for such offerings, and as such, will receive compensation equal to a portion of the gross spread (the difference between the price the client pays for the security and the price at which it purchased the securities). The advisory fee is not reduced to offset this compensation. The amount of the gross spread is described in the relevant prospectus, offering circular or official statement.

Most SCM Investment Adviser Representatives are registered broker-dealer representatives of Triad Advisors. As a member of the selling syndicate SCM Advisors may receive compensation from the sale of an initial public offering (IPO). Such compensation will not offset advisory fees. This may pose a conflict of interest for those individuals as they have a financial incentive to recommend IPO purchases. However, SCM and its personnel are constrained by fiduciary principles to act in the client's best interest and will only recommend IPO's when they are believed to be suitable.

Certain Advisors are separately licensed as insurance agents/brokers for various independent insurance companies. These individuals may spend as much as 5% of their time with these aforementioned non-advisory activities. In their capacities as registered representatives or as independent insurance agents, clients will be charged separately from their advisory services. SCM clients are not obligated to purchase any recommended insurance products.

SCM requires that clients establish brokerage accounts with Fidelity Institutional Wealth Services ("FIWS") to maintain custody of clients' assets and to effect trades for their accounts. SCM is independently owned and operated and not affiliated with FIWS or any other broker-dealer.

### ***Code of Ethics***

SCM has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor-mongering,

restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at SCM must acknowledge the terms of the Code of Ethics annually, or as amended.

Advisors of SCM may buy or sell securities that are recommended to clients. SCM's employees and persons associated with SCM are required to follow the Code of Ethics. Subject to satisfying this policy and applicable laws, officers, directors and employees of SCM and its affiliates may trade for their own accounts in securities that are recommended to and/or purchased for SCM's clients. The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of SCM 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 not materially interfere with the best interest of SCM's clients. In addition, the Code restricts trading in close proximity to client trading activity. When practical, employee trades may be aggregated with client trades. 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. Employee trading is continually monitored under the Code of Ethics to reasonably prevent conflicts of interest between SCM and its clients.

Certain affiliated accounts may trade in the same securities with client accounts on an aggregated basis when consistent with SCM's obligation of best execution. In such circumstances, the affiliated and client accounts will share commission costs equally and receive securities at a total average price. SCM will retain records of the trade order (specifying each participating account) and its allocation, which will be completed prior to the entry of the aggregated order. Completed orders will be allocated as specified in the initial trade order. Partially filled orders will be allocated on a pro rata basis. Any exceptions will be explained on the order.

You may request a copy of the firm's Code of Ethics by contacting the Compliance Department at our main number.

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

Your Advisor conducts account reviews at least annually. Factors that are considered during such reviews include, but are not limited to the following: investment objectives, targeted allocation, current allocation, suitability, performance, monthly distributions, concentrated positions, diversification, and outside holdings. Examples of situations that may impact your account include the following: performance that is not in line with the client's "downside risk tolerance," change in investment objective, the client makes a significant addition of capital or withdrawal of capital from the account, rebalancing of the portfolio if current allocation and targeted allocation are not consistent, concentrated position that could lead to volatility, etc.

You should receive statements at least quarterly from the qualified custodians that holds and maintains your investment assets. We urge you to carefully review such statements and compare the official custodial records to the account statements that we may provide you.

The Investment Advisor will provide Clients with Account performance reviews at least annually. The performance review may include some of the following: a written statement reflecting the assets in the Client's Account, the purchase date, the cost basis, the current market value, and other applicable performance data for the period (or since the opening of the Account). The Client will also receive monthly Account statements, tax related reports, and trade confirmations directly from the custodian.

Factors that are considered in the performance review process include, but are not limited to the following: gains and losses, yield, current allocation, performance, benchmark comparisons, net additions, concentrated positions, and diversification by asset class and segment.

You agree to inform us in writing of any material changes to your financial circumstances that might affect the manner in which your assets should be invested. You may contact us during normal business hours to consult with your Advisor concerning the management of your account(s).

### ***Client Referrals and Other Compensation***

SCM does not receive an economic benefit for providing investment advice or advisory services outside of the Wrap Fee charged to the client. SCM does not compensate others for Client referrals.

### ***Financial Information***

Registered Investment Advisers are required to provide you with certain financial information or disclosures about SCM's financial condition. SCM has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of any bankruptcy proceeding.

### ***Brokerage Practices***

For SCM client accounts maintained in its custody, the custodian holding your account does not generally charge separately for custody services. They are compensated by account holders through commissions and other transaction-related or asset-based fees for securities trades that are executed. The custodians make products and services available to SCM that benefit SCM but may not directly benefit its clients' accounts. Many of these products and services are used to service all or a substantial number of SCM accounts. Some of these products and services provided includes software and other technology that (i) provides access to client account data (such as trade confirmations and account statements); (ii) facilitates trade execution and allocates aggregated trade orders for multiple client accounts; (iii) provides research, pricing and other market data; (iv) facilitates payment of SCM fees from its clients' accounts; and (v) assists with back-office functions, recordkeeping and client reporting.

Most SCM Advisors are also registered representatives of Western International Securities, Inc. ("WIS") and may recommend WIS for broker-dealer services. Factors for such recommendation would be when transaction compensation is seen as a benefit to the client. For broker-dealer services, SCM or its associated persons may receive compensation, which is separate and distinct from compensation related to its investment advisory services. Commissions paid to SCM advisors for broker-dealer services may be higher or lower than those paid by other brokers.

SCM does not recommend broker-dealers for client transactions in connection with third-party money managers or plan sponsor and plan participant services.

Consistent with obtaining best execution, brokerage transactions may be directed to certain broker-dealers in return for investment research products and/or services which assist SCM in its investment decision-making process. Such research generally will be used to service all of SCM's clients, but brokerage commissions paid by one client may be used to pay for research that is not used in managing that client's portfolio. The receipt of investment research products and/or services as well as the allocation of the benefit of such investment research products and/or services poses a conflict of interest because SCM

does not have to produce or pay for the products or services. The products received qualify as "brokerage or research services" under Section 28(e) of the Securities Exchange Act of 1934 ("Exchange Act").

When consistent with our duty to obtain best execution, we will aggregate multiple client transactions into a single order in order to obtain the best price for our clients.

### **Privacy Policy**

Atlanta Capital Group D/B/A Stark Capital Management ("SCM") collects non-public information about you from the following sources:

- Information we receive from you on account applications or other forms
- Information about your transactions with SCM or others
- Information we receive from a consumer-reporting agency

We do not disclose any non-public personal information about you to anyone, except as permitted by law. We maintain physical, electronic and procedural safeguards in compliance with federal standards to protect your information. If you decide to close your account(s) or you become an inactive customer, we will adhere to the privacy policies and practices as described in this notice.

Investment Advisors of Stark Capital Management are Registered Representatives of Triad Advisors ("Triad") or Western International Securities, Inc. ("WIS"). SCM will disclose customer information to and receive customer information from Triad or WIS for the purposes of offering additional products and services to you as well as to effect, administer, service and enforce your requested transactions and maintain and service your accounts. Triad or WIS may also continue to use personal information they receive from us to perform services on our behalf, to respond to communications from you, as you authorize or request, or, if you are their customer, to offer you their products or services. To the extent that you are entitled to other protections under applicable laws and these laws apply, we will comply with them when we share personal information about you.

SCM restricts access to your personal account information to only those employees who need to know that information to provide products or services to you. For more information on our Privacy Policy, please contact the Compliance Department at (404) 893-4100 or [compliance@atlantacapitalgroup.com](mailto:compliance@atlantacapitalgroup.com).