

Acamar Global Investments, LLC



Registered Investment Advisor

Informational Brochure

Form ADV Part II – Disclosure Brochure

April 31, 2014

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This Brochure provides information about the qualifications and business practices of Acamar Global Investments ["Acamar Global Investments, LLC", "Acamar Global", "We", and "ADVISER"]. If you have any questions about the contents of this Brochure, visit our web site at:

<http://www.acamarglobal.com/contact>

For a more immediate response contact Rudolph A. Martin at 1-617-869-4992.

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.

Acamar Global Investments is a registered Investment Adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser.

Additional information about Acamar Global Investments is also available on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for Acamar Global Investments is **155654**.

SEC No. 801-72777

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ITEM 2 - MATERIAL CHANGES

This Annual Brochure is dated April 31, 2014 and filed annually. The material changes in this document since our prior Informational Brochure, dated January 31, 2013 are noted below:

Item 4 - Advisory Business

Acamar Global is pleased to announce the newest addition to its team, Managing Directors, Melissa A Gannon and Paul P Masaracchio. Melissa focuses on pension, government and educational mandates. Paul handles inquiries from Family Offices and other financial advisers. With these additions we are building our institutional and accredited investor services.

As part of the preparations to launch the Acamar Global Growth Fund, "The Fund", last year we terminated certain large institutional sales/trading and advisory contracts which had the effect of reducing our RAUM. Acamar Global Investments has applied to switch from SEC to Florida state registration to maintain its eligibility for appropriate advisory business consistent with its renewed model management and institutional focus.

After many years of service, Richard A Widows has retired and is no longer associated with Acamar Global. His compliance duties are now the direct responsibility of the President, Rudolph A Martin.

Other changes to refocus our resources and manage risks include

- Eliminating all direct, discretionary SEPARATE ACCOUNT MANAGEMENT SERVICES. We no longer offer customized, discretionary advisory services to non-accredited individuals and leave that to the fiduciaries that implement our stock selection models for their clients. In its place are details about **INSTITUTIONAL DISCRETIONARY SERVICES**.
- Reducing our model portfolio strategies to three base themes U.S. Multi-Cap Growth, Emerging Growth and Global Blue Chips and overlaying the Acamar STARS methodology. These are now offered as part of the **INSTITUTIONAL MODEL SERVICES**, a non-discretionary advisory product.
- Closing the DATA, RESEARCH AND OTHER CUSTOMIZED SERVICES to external, unrelated entities and focusing these resources on internal research for the models and "The Fund".

This allows us to work with accredited investors as defined under Regulation D promulgated by the Securities Act of 1933. through "The Fund". We further updated the pooled investment vehicle information in Item 4 with more information about the Acamar Global Growth Fund, "The Fund" and also discussed the potential associated conflicts and risks of this throughout the brochure. Hedging; Highly Volatile Instruments and other risks were added to the description. Please see the offering documents for full details

Item 14 - Client Referrals and Other Compensation

We added a subsection on Relationships with Solicitors. It states the possibility of using unaffiliated solicitors in the future and that we will comply with Investment Advisers Act sections 275-206-4-3 and section 275-206-4-5 if we do utilize them. We have no third party agreements as of this date.

ITEM 3 - TABLE OF CONTENTS

Please retain a copy of this brochure for your records

April 31, 2014

Table of Contents

Item 1 – Cover Page.....	1
Item 2 - Material Changes	2
Item 3 - Table of Contents	3
Item 4 - Advisory Business	4
Item 5 - Fees and Compensation	6
Item 6 - Performance-Based Fees and Side-By-Side Management	9
Item 7 - Types of Clients	10
Item 8 - Methods of Analysis, Investment Strategies and Risk of Loss.....	11
Item 9 - Disciplinary Information.....	16
Item 10 - Other Financial Industry Activities and Affiliations	16
Item 11 - Code of Ethics, Participation in Client Transactions and Personal Trading	17
Item 12 - Brokerage Practices.....	18
Item 13 – Review of Accounts	22
Item 14 - Client Referrals and Other Compensation	23
Item 15 - Custody	24
Item 16 - Investment Discretion	24
Item 17 - Voting Client Securities	25
Item 18 - Financial Information	25
Principal Officers and Advisory Team Members	25

ITEM 4 - ADVISORY BUSINESS

Acamar Global Investments, LLC is wholly owned by Acamar Global Holdings, Inc. which is a private corporation formed under the laws of the State of Florida. The 100% employee-owned company is controlled by Rudolph A. Martin. We have been providing advisory services to institutional investors since October of 2007. The firm's name was changed from Latin Capital Management, LLC to Acamar Global Investments, LLC in 2012 to reflect the growing global investment management focus.

Rudy Martin is a 30-year veteran institutional analyst and portfolio manager for large well-known investment firms. He started the adviser to fill the gap for investment and research advisory services covering U.S. and international stocks with significant business in the fast-growing, developing markets like Brazil, Russia, India, China and South Africa.

Our team is headed by the following.

PRINCIPAL EXECUTIVE AND ADVISORY TEAM

Rudolph A. Martin, President, Chief Investment Officer

Melissa A. Gannon, Managing Director

Paul P. Masaracchio, Managing Director

Gerald L. Serrano, Corporate Secretary-Treasurer

Descriptions of the educational backgrounds and employment histories of Acamar Global Investments' key officers and advisory team appear at the end of this brochure.

ASSETS UNDER MANAGEMENT

As of April 31, 2014 Acamar Global Investments had no Regulatory Assets Under Management ("RAUM") to report other than our own investment in the Fund to keep it active. At current asset levels this private fund does not currently require SEC registration, nor does a reporting adviser requirement exist as it is less than \$150 million in assets. In 2013, our firm terminated certain large institutional sales/trading and advisory contracts to reduce the potential for conflicts of interest. Acamar Global Investments has applied to switch from SEC to Florida state registration to maintain its eligibility for appropriate advisory business consistent with its renewed wholesale model management and institutional focus.

ABOUT OUR SERVICES GENERALLY

We provide services based on core strategies which we have developed to meet a variety of client needs, such as performance, income, style and geographic diversity of assets. Our core belief in active management, original insights and independent research are what make us different.

As part of our ongoing active management process, we also use computerized, proprietary multi-factor analysis models developed by the principals of the firm over decades of experience with large institutional investment portfolios.

We provide both discretionary and non-discretionary investment management services and products to institutional clients.

INSTITUTIONAL DISCRETIONARY SERVICES

We provide discretionary services where we have the discretion to purchase and sell the securities in the portfolio. We provide this investment advice to either a) accounts within broker/dealer sponsored platforms; or b) mutual funds or private funds where we act as a sub-advisor.

Acamar Global recognizes that each client is unique with different needs. Therefore, we may modify our primary investment strategies to meet client specific goals, investment objectives and/or accompanying restrictions.

All direct-managed clients that are not sub-advised must complete and sign an Investment Advisory Agreement when they open an account with us. The Investment Advisory Agreement details their investment objectives, the investment strategy, fees, refund policies and any investment restrictions affecting our management of their account.

We may customize any of our strategies to meet a client's specific objectives and/or constraints. However modifications of our buy/sell disciplines and other appropriate investment techniques may result in an increase or decrease in a client's performance as compared to other accounts invested in the same strategy.

INSTITUTIONAL MODEL SERVICES

We also provide advice on a non-discretionary basis where we do not purchase or sell securities; rather, we provide the details of our model portfolio to the discretionary investment manager. In these instances, the other manager (which may or may not be affiliated with Acamar Global) is the discretionary investment manager, has investment discretion over the account, and is responsible for monitoring the individual needs of the client. In non-discretionary programs, we amend and update the model portfolios when a model change occurs and provide this information to the discretionary manager. We do not have direct contact with the clients of these programs. We provide non-discretionary advice to Unified Managed Accounts ("UMAs"). None of these assets are included in our RAUM calculations.

ACAMAR GLOBAL GROWTH FUND

THIS POOLED INVESTMENT VEHICLE WHICH IS MORE FULLY DESCRIBED IN A SEPARATELY AVAILABLE PRIVATE PLACEMENT MEMORANDUM, FILINGS AND OTHER OFFERING AND ORGANIZATIONAL DOCUMENTS. THIS INFORMATION IS PROVIDED HERE IN THIS BROCHURE ONLY AS A GENERAL DESCRIPTION OF OUR SERVICES AND IS NOT AN OFFERING OF ANY PARTNERSHIP INTEREST, INVESTMENT OR SECURITY.

We serve as both 1) the investment advisor to the offshore funds of and 2) the General Partner to the U.S. Limited Partnership of the Acamar Global Growth Fund, "The Fund".

This fund is structured as a master feeder as follows:

- Acamar Global Growth Fund, L.P. and Acamar Global Growth Fund Ltd. (are respectively, the domestic and offshore feeder funds of Acamar Global Growth Master Fund, Ltd., a British Virgin Islands international business company)
- The U.S. Limited Partnership is exempt from registration under the Investment Company Act of 1940.
- The offshore entities are registered in the British Virgin Islands as recognized professional funds.

We provide investment advisory services to each fund based on the investment objectives, policies and restrictions contained in the offering and organizational documents for the Acamar Global Growth Fund. Please refer to these for further details including past performance, expenses, risks and other considerations.

ITEM 5 - FEES AND COMPENSATION

The following section describes how we are compensated for the investment advisory services that we provide to our clients. Our clients have the right to terminate their agreement without penalty within (5) business days of its execution along with other termination rights.

INSTITUTIONAL DISCRETIONARY SERVICES

Acamar Global may be engaged by other investment advisers (including advisers to registered investment companies) to manage accounts on their behalf. In our capacity as “sub-advisor” to these accounts, our fees and services are determined by contract with the adviser. Information regarding these sub-advisory arrangements can be accessed by requesting a copy from the Adviser. The payments for this service are made on a quarterly basis in arrears.

INSTITUTIONAL MODEL SERVICES

In non-discretionary programs, such as UMAs, MSPs, MAPs, etc., the client typically pays the sponsor an all-inclusive fee, a portion of which is paid to Acamar Global as compensation for the investment advisory model provision services we provide to the sponsor.

For detailed information on the fees charged by each sponsor, please refer to the sponsor’s fee brochure or your agreement with the sponsor.

In evaluating these arrangements, clients should recognize that brokerage commissions for the execution of portfolio transactions executed by the sponsor’s delegated broker are not negotiated by Acamar Global.

Large institutional clients with over \$1 billion in total equity portfolio assets may pay for the use of Acamar STARS data or trade signals through either cash or soft dollar payments as appropriate to the size of the program allocation and the customers performance metrics. The payments for this service are made on a quarterly basis in arrears.

ACAMAR GLOBAL GROWTH FUND

We receive management fees for providing investment advisory services to the Acamar Global Growth Fund. Subject to certain limitations, we are entitled to receive performance fees based on the unrealized or realized net profits of the Acamar Global Growth Fund. These compensation structures may create potential conflicts of interest because we could have an incentive to solicit prospective Limited Partners in, and devote more resources to the Acamar Global Growth Fund. This compensation is described in the offering and organizational documents for the Acamar Global Growth Fund and summarized below.

We receive management fees of 2% per annum of the net asset value of the partnership, calculated and payable quarterly in advance. As the managing General Partner of the partnership, we may receive performance fees of up to 20% of the unrealized and realized net profits of the partnership, subject to certain limitations. These management fees and performance fees are indirectly paid by Acamar Global Growth Fund, L.P. and Acamar Global Growth Fund, Ltd., the feeder funds of Acamar Global Growth Master Fund, Ltd.

Under the Fund's Limited Partnership Agreement (the "LPA"), all legal, filing, accounting and organizational fees and expenses incurred in connection with the formation and initial marketing of the Fund are paid by the Fund or reimbursed or reimbursed to us as the General Partner. These are amortized among the Limited Partners over the course of sixty (60) months.

The Acamar Global Growth Fund generally pays all other expenses that are attributable to the direct operating activities of the fund, such as:

- expenses incurred in evaluating, acquiring or disposing of investments;
- expenses incurred in carrying or managing investments, such as custodial, recordkeeping and administration fees;
- expenses incurred in preparing financial statements and tax returns;
- accounting and professional fees and expenses; and other operating expenses.

We are also responsible for paying all indirect operating expenses of the Fund, such as rent, administrative personnel, travel and entertainment costs and communications and equipment expenses from our management fee.

We may waive the management fee for investors in the Acamar Global Growth Fund at our discretion, including those for us and/or our principals, employees and affiliates. As the General Partner of the Acamar Global Growth Fund, we may also waive any applicable performance fees for Limited Partners in the Acamar Global Growth Fund at our discretion, including those for us and/or our principals, employees and affiliates.

Our management fee is generally based on the net asset values of the Acamar Global Growth Fund. The net asset value is calculated by adding the fair market value of the investments, which is calculated based on data provided by us, the custodians or the administrators for the Acamar Global Growth Fund, cash and other assets, and by subtracting the Acamar Global Growth Fund liabilities. Our valuations of investments are generally based on information that we receive from our independent third-party pricing vendor and may be higher or lower than the valuations calculated by the custodian for such Acamar Global Growth Fund. If no pricing information from our third-party pricing vendor is available for an investment held or we do not agree with our third-party pricing vendor's valuation, as the General Partner of the Acamar Global Growth Fund we will determine the fair market value of such investment in good faith. A potential conflict of interest may therefore exist because our management fees, performance fees, and performance results are based on our valuations of investments for the Acamar Global Growth Fund.

We receive a performance based allocation of 20% of the aggregate net realized and unrealized profits of the Fund for each calendar quarter. The Fund has a "high water mark" provision, such that if a Limited Partner has any prior unrecouped net losses charged to his capital account which have not been offset by subsequent net profits, We do not receive any further performance based allocation until such time as that Limited Partner has fully recouped such net losses.

The fund is subject to addition conditions which may limit an investor's liquidity and affect profits.

- We are authorized to designate an investment of the Partnership as a Side Pocket Investment when we believe that it either lacks a readily assessable market value or should be held until the resolution of a special event or circumstances (the "Side Pocket").
- If aggregate redemption requests are received for a particular Redemption Date for more than 15% of the Net Asset Value of the Fund as of such Redemption Date, the Directors may, reduce all redemption requests for the Fund for such Redemption Date pro rata in proportion to the amount sought to be redeemed by each redeeming Shareholder so that only 15% of the Net Asset Value of the Fund as of such Redemption Date is redeemed (the "Gate").

- Beginning 12 months from the date of a Limited Partner's admission to the Partnership (such period to be the "Lock-Up Period"), Limited Partner will be generally permitted to make withdrawals from its Capital Account as of the last business day of any calendar quarter, or such other date as the General Partner may determine, in its sole discretion (each such date, a "Withdrawal Date") subject to 30 days prior written notice. Withdrawals may be permitted prior to the expiration of the Lock-Up Period applicable to a Limited Partner in the sole and absolute discretion of the General Partner, in which case the Limited Partner requesting such withdrawal shall be subject to an early withdrawal penalty equal to 2% of the withdrawal proceeds to which such Limited Partner would otherwise be entitled (the "Early Withdrawal Penalty").

This is a summary only and additional conditions and information about fees and expenses paid by the Acamar Global Growth Fund are contained in the offering and organizational documents for the Acamar Global Growth Fund. All fees are subject to negotiation and vary based on the specific Limited Partner's/shareholder's requirements.

ITEM 6 - PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

As described in Item 5 – Fees and Compensation) above , as the Fund's General Partner, we charge a 20% performance based allocation of the aggregate net realized and unrealized profits of the Fund for each calendar quarter. The Fund has a “high water mark” provision, such that if a Limited Partner has any prior unrecouped net losses charged to his capital account which have not been offset by subsequent net profits, the Firm does not receive any further performance based allocation until such time as that Limited Partner has fully recouped such net losses. The fact that the General Partner is compensated based on the trading profits may create an incentive for the General Partner to make investments on behalf of the Fund that are riskier or more speculative than would be the case in the absence of such compensation. In addition, the performance based compensation received by the General Partner is based primarily on realized and unrealized gains and losses that clients may never realize.

We make investment decisions for our clients based on their respective investment objectives, guidelines, restrictions, risk profiles, tax status and other relevant considerations. Consequently, we may purchase or sell securities at the same or different times for some clients but not other clients, or we may make investment decisions for some clients that are contrary to investment decisions for other clients. In addition, we could favor some clients over other clients in the order in which trades are placed, in that accounts for which trades are placed first could receive a more or less favorable execution price than accounts for which trades are placed in subsequent transactions. We could also favor some clients over other clients when allocating investment opportunities of a limited nature, such as initial public offerings and private placements. We and/or our principals, employees or affiliates have a proprietary interest in certain accounts of the Acamar Global Growth Fund and we therefore may have an incentive to favor such accounts over other accounts or devote more resources to such accounts as compared to other accounts.

These practices may be considered potential conflicts of interest because they may benefit some clients over other clients depending on market conditions and other factors. We believe we have implemented policies and procedures that are reasonably designed to mitigate potential conflicts of interest raised by side-by-side management of various accounts. Some of these policies and procedures are described in Item 12 – Brokerage Practices--of this brochure. You may contact our Chief Compliance Officer, Rudolph A. Martin at (786) 510-2522 to discuss the policies and procedures we have implemented in an effort to mitigate potential conflicts of interest raised by side-by-side management of various accounts.

We have procedures designed and implemented to ensure that all clients are treated fairly and equally, and to prevent conflicts from influencing the allocation of investment opportunities among clients.

TEM 7 - TYPES OF CLIENTS

Acamar Global Investments provides investment management services to institutional and high-net-worth investors globally.

We will only accept direct U.S. clients if they are accredited investors and we can document that. Clients agree to immediately contact Acamar Global Investments if there is any change in their status as an "accredited investor" under Regulation D promulgated under Securities Act of 1933.

For investors outside of the U.S., we provide services through our BVI feeder fund, Acamar Global Growth Fund, Ltd which invests in the Acamar Global Growth Master Fund, Ltd subject to know-your-customer, anti-money laundering documentation and other regulation as appropriate.

This brochure is designed solely to provide information about us and should not be considered to be an offer of interests in any fund or investment vehicle in which we may become associated with or any fund or other investment which any of our clients is an adviser or sub-adviser of.

Our requirements for opening and maintaining an investment account with us are summarized below.

DISCRETIONARY ACCOUNTS

We generally require the following minimum account sizes for opening and maintaining separately The Acamar Global standard minimum account size is \$1,000,000 for individuals and \$5,000,000 for institutional investors. However, the minimum account size is negotiable and may be waived or modified at our discretion. We may waive the minimum or require a higher minimum depending on the specific strategy selected and any additional support or service required by the client, the client's consultant or program sponsor.

In circumstances where we serve as an adviser within a Wrap/SMA/UMA fee program or are an adviser or sub-adviser to other funds or accounts, the account minimums are generally determined by our agreement with the relevant Wrap/SMA fee program sponsor, fund, or account.

ACAMAR GLOBAL GROWTH FUND

The Acamar Global Growth Fund generally requires the following minimum initial investment amounts and eligibility requirements:

- The Acamar Global Growth Fund generally requires an initial minimum investment of \$1,000,000. We may waive this minimum investment amount in our discretion.
- U.S. domestic fund Limited Partners must qualify as both "accredited investors" and "qualified purchasers" under applicable U.S. federal securities laws.

Additional information regarding the minimum initial investment amounts, capital commitments, eligibility criteria, and purchase and redemption requirements are described in the offering and organizational documents for the Acamar Global Growth Fund.

ITEM 8 - METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

OUR ANALYSIS MODELS

Our approach to investing is customized to fit specific needs of investors and our clients.

In general our investing style can be described as a "quandamental" approach - combining the statistical rigor of a quantitative approach with the qualitative overlay of typical fundamental analysis.

The process starts with a selection core group of publicly traded companies which our models determine have well above average growth or present significant discounts to target values. Our models rank them on a variety of factors in four quadrants growth, profitability, valuation and risk.

Then our fundamental review combines other systematic factors such as timeliness and risk/reward functions along with our views on the general market, interest rate, political and other relevant items.

This method is at the core of our process for all our equity-based investment strategies. Note that the Fund is multi-strategy with multiple asset classes. It's investment focus and risk are very different from the solo-strategy long-only equity approaches described here.

INVESTMENT STRATEGIES

MODEL-BASED STRATEGIES (DISCRETIONARY AND NON-DISCRETIONARY)

The following section includes a summary of the common investment objectives, principal investment strategies, and material risks of the principal investment strategies that we offer to clients through separately managed accounts, model portfolio strategies and UMA programs.

U.S. MULTI-CAP GROWTH (ACAMAR STARS)

- Investment Objective: The model portfolio seeks to maximize long-term capital appreciation.
- Principal Investment Strategies: The model portfolio seeks to achieve its investment objective by investing under normal circumstances at least 80% of its net assets in equity securities. It focuses on large capitalization U.S.-domiciled stocks likely to experience greater capital appreciation than the general stock market. These stocks normally are highly discounted relative to growth prospects.
- Material Risks: General Market and Economic Risk; Specific Security Risk; Stock Market Risk; Management Risk;

GLOBAL BLUE CHIPS

- Investment Objective: The model portfolio seeks to maximize total return from capital appreciation plus dividends.
- Principal Investment Strategies: The model portfolio seeks to achieve its investment objective by investing primarily in a portfolio of equity and fixed income securities. It focuses on companies that will benefit from the New Global Middle Class. These are the companies that are the next

generation of global brands and have solid cash generation capabilities. Trading recommendation signals are triggered by a relative to universe dividend yield approach

- Material Risks: General Market and Economic Risk; Specific Security Risk; Management Risk; Interest Rate Risk; Credit Risk; Liquidity Risk; Foreign Investment Risk.

EMERGING GROWTH

- **Investment Objective:** The model portfolio seeks to maximize long-term capital appreciation.
- **Principal Investment Strategies:** The model portfolio seeks to achieve its investment objective by investing under normal circumstances at least 80% of its net assets in equity securities. It focuses on stocks of companies whose business activities are primarily located in emerging market economies around the world, such as India, Brazil, Russia and South Africa. The portfolio selections are stocks deemed likely to experience greater capital appreciation than the general stock market these stocks normally are highly discounted relative to growth prospects.
- **Material Risks:** General Market and Economic Risk; Specific Security Risk; Management Risk; Small and Mid Cap Risk; Liquidity Risk; Foreign Investment Risk.

ACAMAR GLOBAL GROWTH FUND

We provide direct investment advisory services to the Acamar Global Growth Fund, a related private fund which has a global multi-strategy tactical allocation mandate. As a multi-strategy fund it may invest in equities, options, ETFS and a variety of securitie types and asset classes.

The summaries of the investment objectives, principal investment strategies, and material risks provided below are necessarily limited and are presented for general informational purposes in accordance with regulatory requirements. Consequently, these summaries are in all instances qualified and superseded by the offering and organizational documents for the Acamar Global Growth Fund. Additional information about the investment objectives, investment strategies, risks, and other terms and provisions of the Acamar Global Growth Fund are contained in the offering and organizational documents for the Acamar Global Growth Fund.

Although we have broad discretion to employ a variety of investment strategies, the following are likely to be implemented by the Fund.

ACAMAR GLOBAL GROWTH FUND

- **Investment Objective(s):** The fund seeks to achieve capital appreciation.
- **Principal Investment Strategies:** The fund seeks to achieve its investment objective by maintaining a long-biased portfolio primarily comprised of securities of publicly held companies. The partnership may engage in short selling for hedging purposes or to the extent we believe securities are overvalued. The partnership may also invest in securities of privately held companies or other illiquid investments, although the partnership expects that these investments generally will not exceed 5% of the long market value of the partnership's portfolio. The fund also has the ability to invest in a range of other publicly-traded securities, including options, to maximize return and moderate risk.
- **Material Risks:** As described above the fund faces General Market and Economic Risk, Specific Security Risk, Stock Market Risk, Small and Mid-Cap Risk, Interest Rate Risk, Credit Risk, Management Risk, Liquidity Risk, Foreign Investment Risk, and Quantitative Risk.

In addition the fund may also be subject to a variety of other specific risks detailed in the offering and organizational documents for the Acamar Global Growth Fund including: Stock Market Risk; Illiquid Investments Risk;; Concentration Risk; Short Selling Risk; Leveraging and Borrowing Risk; Counterparty Risk; Valuation Risk; Limited Liquidity Risk; In-Kind Distributions Risk; Management Risk; Compensation Risk; Tax Risk. Hedging; Highly Volatile Instruments and other risks as detailed in the offering documents.

DESCRIPTION OF SPECIFIC RISKS

In the interest of fair disclosure and honesty, we earnestly ask that you read the disclosures about the Fund from the offering documents. What follows is a general listing and not a comprehensive categorization of all possible risks.

As with any publicly-traded security investment, loss of principal and interest or the amount you invest is a possibility. Here are some descriptions of conditions that might cause adverse development in the prices or markets for securities we invest in.

- **General Market and Economic Risk:** The value of the strategy's investments may decline due to changes in general economic and market conditions. The value of securities held in the strategy may change in response to developments affecting entire economies, markets or industries, such as inflation, changes in interest rates, political and legal developments, and general market volatility.
- **Specific Security Risk:** The value of an equity or fixed income security held by the strategy may decline in response to developments affecting the specific issuer of the security, even if the overall industry or economy is unaffected. These developments may include a variety of factors, such as management issues, political factors, a decline in revenues or profitability, a failure to meet earnings expectations, litigation, bankruptcy, an increase in operating or other costs, or an adverse effect on the issuer's competitive position.
- **Stock Market Risk:** The strategy invests in equity securities and is subject to stock market risks and significant fluctuations in value. The strategy's investments in equity securities will typically focus on common stocks. Common stocks generally are subordinate to the issuing company's debt securities, credit obligations and preferred stock upon the liquidation or bankruptcy of the issuing company.
- **Small and Mid Cap Risk:** The strategy may invest in securities of small or mid capitalization companies that may not have the size, resources and other assets of large capitalization companies. As a result, the securities of small or mid cap stocks held by the strategy may be subject to greater market risks and fluctuations in value than large capitalization companies.
- **Interest Rate Risk:** When interest rates rise, the value of fixed income investments in the strategy may decline. When interest rates decrease, income from the strategy's fixed income investments may decline. This effect is typically more pronounced for intermediate and long-term fixed income securities.
- **Credit Risk:** If the strategy holds fixed income securities of an issuer that experiences financial problems, the securities will likely decline in value or the issuer may fail to make timely payments on the securities. Political, economic and other factors also may adversely affect the value of fixed income securities held in the strategy.
- **Management Risk:** We actively manage investments in the strategy. The value of investments in the strategy may decline if we fail to correctly identify risks affecting the broad economy or specific markets, industries or companies in which the strategy invests, or if investments we select for the strategy fail to perform as anticipated.
- **Liquidity Risk:** Due to a lack of demand in the marketplace or other factors, the strategy may not be able to sell some or all of its investments promptly, or may only be able to sell investments at less than desired prices.
- **Foreign Investment Risk:** The strategy may invest in securities of foreign issuers. Investments in securities of foreign securities are subject to risks associated with foreign markets, such as

adverse political, social, and economic developments, accounting standards or governmental supervision that is not consistent with that to which U.S. companies are subject, limited information, fluctuations in currency exchange rates, and less liquidity in foreign markets.

- Quantitative Risk: Investments in the strategy are selected using quantitative methods and may perform differently from the market as a whole and are subject to potentially inaccurate assumptions in the construction or management of the model.

Advice offered by us may also involve investment in mutual funds or ETFs, options and other security types or asset classes.

Clients are hereby advised that all fees paid to us for investment advisory services are separate and distinct from the fees and expenses charged by ETFs and/or mutual funds (described in each fund's prospectus) to their shareholders. These fees generally include a management fee and other fund expenses. Further, clients may incur transaction charges involved with purchasing or selling securities. We do not share in any portion of the brokerage fees/transactions charges imposed by the custodian that holds clients funds or securities. Clients should review all fees charged by mutual funds, us and others to fully understand the total amount of fees to be paid.

SOURCES OF INFORMATION

In conducting analysis of securities, we use a number of tools including custom market surveys, Infiniticals online valuation service, Bloomberg Professional, MarketGrader and other proprietary screening and filtering software programs. Other sources include commercially available software technology, securities-rating services, financial newspapers, mutual fund reports, prospectuses, financial and trade magazines, SEC filings, and financial statements. Management interviews are also a key resource utilized to generate the final conclusions. In certain cases, we may also use outside consultants to provide expertise or additional assistance in particular areas of information or analysis.

EDUCATION AND BUSINESS STANDARD

Investment decision-makers are required to have completed college education in addition to significant work experience. In addition, all personnel providing investment advice are required to have financial, analytical or portfolio management experience. Our investment personnel are expected to have passed or be making progress toward passing the Uniform Investment Adviser (Series 65) Examination or other relevant, required securities examinations.

ITEM 9 - 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 Acamar Global Investments or the integrity of our management. Acamar Global Investments nor the management team have no information applicable to this Item.

ITEM 10 - OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

We are not registered (nor do we have any applications pending) as a securities broker-dealer, futures commission merchant, commodity pool operator, commodity trading adviser, municipal or government securities dealer or broker.

COMPETING TIME DEMANDS

We and our principals may have business relationships outside of the client network for institutions such as corporations that are not investment management-related. We and our principals may accept special non-client studies, industrial consulting projects, advisories, directorships, speaking, writing and other engagements.

The principals have agreed to devote the majority of their time to investment management, operational and marketing activities at the Fund and to hire additional qualified staff to provide continuity of services for our other clients, as the Fund's growth requires.

POTENTIAL CONFLICTS OF INTEREST

Our investment advisory and other services for the Acamar Global Growth Fund may create potential conflicts of interest. These potential conflicts of interest are further described in Item 5 – Fees and Compensation, Item 6 – Performance-Based Fees and Side-by-Side Management, Item 11 – Code of Ethics, Participation or Interest in Client Transactions, and Personal Trading, and Item 12 – Brokerage Practices of this brochure.

Additional information regarding our investment advisory services to, and potential risks and conflicts of interest associated with, the Acamar Global Growth Fund is included in the offering and organizational documents for the Acamar Global Growth Fund.

ITEM 11 - CODE OF ETHICS, PARTICIPATION IN CLIENT TRANSACTIONS AND PERSONAL TRADING

CODE OF ETHICS

We have 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 Acamar Global Investments must acknowledge the terms of the Code of Ethics and Personal Securities Trading Policy Manual annually, or as amended.

Our code of ethics is available to existing and prospective clients upon request. To receive a copy of our code of ethics, please contact the Chief Compliance Officer:

Rudolph A. Martin

Acamar Global Investments

1111 Brickell Ave, Ste. 1100

Miami, FL 33131

Telephone No.: (786) 510-2557

E-mail: compliance@acamarglobal.com

PARTICIPATION IN CLIENT TRANSACTIONS

We anticipate that, in appropriate circumstances, consistent with clients' investment objectives, it will cause accounts over which we have management authority to effect, and will recommend to investment advisory clients or prospective clients, the purchase or sale of securities in which we, our affiliates and/or clients, directly or indirectly, have a position of interest. Our employees and persons associated with us are required to follow Acamar Global Investments' Code of Ethics. Subject to satisfying this policy and applicable laws, officers, directors and employees of Acamar Global Investment and our affiliates may trade for their own accounts in securities which are recommended to and/or purchased for our clients. The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of Acamar Global Investments 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. The Code 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 monitored under the Code of Ethics and Personal Securities Trading Policy to reasonably prevent conflicts of interest between us and our clients.

ACAMAR GLOBAL GROWTH FUND

We serve as the investment advisor for the Acamar Global Growth Fund, and as the General Partner of the Acamar Global Growth Fund. In these capacities, we receive management fees from the Acamar Global Growth Fund and, subject to certain limitations, may receive performance fees based on the unrealized or realized net profits of the Acamar Global Growth Fund. We and/or our principals, employees and affiliates are shareholders and/or investors in the Acamar Global Growth Fund. We may offer advice to qualified existing and prospective clients regarding investing in the Acamar Global Growth Fund. These relationships create potential conflicts of interest because we may have a financial incentive to favor the Acamar Global Growth Fund over other client accounts. We furnish prospective investors with offering documents, organizational documents and other information concerning the Acamar Global Growth Fund for their consideration when making a decision to invest in the Acamar Global Growth Fund, as applicable. We also provide prospective investors with an opportunity to ask us questions prior to investing in the Acamar Global Growth Fund.

ITEM 12 - BROKERAGE PRACTICES

BROKERAGE DISCRETION AND BEST EXECUTION

In most cases, our investment management or partnership agreements grant us the authority to select the brokers through which trades are executed and to determine the commission rates to be paid to these brokers. We may consider several factors when selecting brokers to execute trades, including:

- the quality of executions and liquidity provided by the broker,
- the ability of the broker to maintain confidentiality of client orders and order flow,
- the ability of the broker to minimize impact for client transactions,
- the commissions charged by the broker in comparison relative to others for similar transactions,
- the research and brokerage services provided by the broker,
- the broker's ability to obtain timely, accurate and cost-effective executions,
- the ability of the broker to communicate the nature of the market in a particular security,
- the broker's execution policies and commitment to providing best execution,
- the frequency and amount of price improvement typically provided by the broker,
- the size and volume of the broker's order flow, and
- the efficiency of the broker's operations with regard to settlement procedures.

RESEARCH AND SOFT DOLLAR BENEFITS

We may execute trades with brokers that provide us with research and brokerage services at no out-of-pocket cost to us, and our receipt of the research or brokerage products and services may be a factor in our selection of brokers to execute transactions. Our use of Fund or client commissions generated from securities transactions to acquire research and brokerage products and services is generally referred to as “soft dollars.” We may acquire the following research and brokerage products and services using soft dollars:

- analyses, reports, financial publications, and other information regarding the economy, markets, industries, securities, companies and portfolio strategy;
- access to securities and industry analysts and corporate executives;
- seminars and conferences related to markets, industries, securities and companies;
- market and economic data and other technical and quantitative information about markets, industries, securities and companies; and
- order routing, trade settlement, and quotation services.

The research and brokerage products and services that we receive are considered to be both proprietary and third-party in nature. Proprietary research and brokerage products and services are created, developed and provided by the broker executing the trades for which soft dollars are generated. Third-party research and brokerage products and services are created and developed by a third-party but provided by the broker executing the trades for which soft dollars are generated.

Our use of soft dollars may create conflicts of interest. When we use Fund or other client commissions to acquire research and brokerage products and services, we do not have to produce or pay for the research and brokerage products and services with our assets. We may have an incentive to select, use or recommend a broker based on our interest in receiving research or brokerage products and services, to benefit our investment decision-making process and client accounts. When we use Fund or client commissions to obtain research and brokerage products and services, we may pay commissions to brokers for transactions that may be higher than those charged by another broker for the same transactions. The soft dollar credits that we use to purchase eligible research and brokerage products and services are generally calculated based on the difference between the per share commission rate charged by the executing brokers and the per share execution-only rate charged by the executing brokers.

We generally use research and brokerage products and services acquired with soft dollars to service all of our clients, rather than those whose commissions pay for the products and services. We do not seek to allocate these soft dollar benefits among client accounts proportionately to the soft dollar credits the accounts generate because we believe that, in the aggregate, they benefit all clients and assist us in providing investment advisory services to clients. You may benefit from the research and brokerage products and services that we receive even if your account prohibits soft dollar transactions.

We may also participate in so-called “commission sharing arrangements” under which we receive credits from certain brokers that execute transactions for client accounts. We may use these credits to purchase research products and services from the executing brokers, other brokers, or third parties that provide the products and services. We believe these arrangements benefit our investment decision-making process and client accounts. The commission sharing arrangement credits that we use to purchase eligible research and brokerage products and services are generally calculated based on the difference between the per share commission rate charged by the executing brokers and the per share execution-only rate charged by the executing brokers.

We have adopted policies and procedures in an effort to mitigate conflicts of interest associated raised by our use of soft dollars. Under our policies and procedures, the research and brokerage products and services we receive through soft dollars must satisfy the following conditions:

- the research and brokerage products and services must be eligible under Section 28(e) of the Securities Exchange Act of 1934;
- our use of the research and brokerage products and services must provide us with lawful and appropriate assistance in connection with the performance of our investment decision-making responsibilities; and
- we must determine in good faith that the amount of commissions paid to a broker for a soft dollar arrangement is reasonable in light of the value of the products and services provided by the broker (either in terms of a particular transaction or our overall responsibility with respect to accounts for which we exercise investment discretion).

Our soft dollar arrangements are reviewed at least annually by our Brokerage and Compliance, which is comprised of our Chief Compliance Officer, Director of Research, traders, and analysts.

Some of the research and brokerage products and services we use are considered “mixed-use.” Mixed-use products and services are those that qualify as eligible research or brokerage products and services under Section 28(e) of the Securities Exchange Act of 1934, but which are being used for both eligible purposes (such as assisting our investment decision-making responsibilities) and ineligible purposes (such as marketing). We make a good faith allocation of the mixed-use of these products and services and pay soft dollars for the eligible portion and our assets for the ineligible portion. Our mixed-use allocations are reviewed at least annually by our Brokerage and Compliance Committee. Although we believe our allocations of mixed-use products and services are reasonable and made in good faith, this creates a potential conflict of interest because we have an incentive to make mixed-use allocations that benefit our soft dollar arrangements.

The Acamar Global Growth Fund, and other portfolios in which we and/or our principals, employees or affiliates may have a financial interest in, may participate in these soft dollar arrangements. This creates a potential conflict of interest because we may have an incentive to soft dollar benefits to the Acamar Global Growth Fund or these other portfolios instead of our other clients. Conversely, our other clients may likewise benefit from the Fund’s use of soft dollars to purchase research and other brokerage products and services.

TRADE ALLOCATION AND AGGREGATION

We manage portfolios based on investment objectives, guidelines, restrictions, tax status and risk profile, which may overlap between clients. Although we generally execute securities transactions on behalf of our clients on a first-in, first-out basis, we generally have authority to aggregate purchase and sale orders for a particular security in one account with orders of other clients. This may enable us to prevent information leakage by directing the entire order to a particular broker, take advantage of the larger order size to interact with larger buyers and sellers, reduce our footprint in the market, negotiate better transaction prices, and/or reduce transaction costs.

We have adopted policies and procedures for aggregating and allocating client securities transactions. If each client participating in an aggregate order receives its full allocation, then each participating client generally receives the average price per share paid or received for the purchased or sold securities with transaction costs shared pro rata among participating clients. If each client participating in an aggregated order receives less than its full allocation, then each participating client generally receives its pro rata share of the executed order with transaction costs shared proportionately. Under certain circumstances, we have discretion to use alternative allocation procedures if all participating clients are treated fairly and equitably. The circumstances under which we may use alternative allocation procedures include when:

- a pro rata allocation would result in one or more participating clients receiving an odd lot of securities;
- a pro rata allocation would increase transaction costs for certain participating clients;
- a pro rata allocation would be inconsistent with a participating client's investment
- guidelines, available cash, or liquidity requirements; or
- an alternative allocation is necessary to achieve or restore appropriate weighting in a security for participating clients.

The Acamar Global Growth Fund, and other portfolios in which we and/or our principals, employees or affiliates may have a financial interest in, may participate in aggregated orders. This creates a potential conflict of interest because we may have an incentive to allocate trades to the Acamar Global Growth Fund or these other portfolios instead of our other clients.

We participate in model portfolio programs established by unaffiliated sponsors for our equity and small-mid cap investment strategies. Under our agreements with the sponsors of these programs, we communicate model equity portfolios to the sponsors on a rotational basis with the execution of trades for clients invested in our investment strategies. Depending on the timing of these communications, the sponsors may execute trades for their clients before we execute trades for applicable clients, which could result in applicable clients realizing less favorable prices on securities transactions than those that would have been obtained if we did not participate in such programs.

STEP-OUTS

We generally have authority to use step-out procedures when executing securities transactions for an account. In these circumstances, we may direct one or more executing brokers to allocate portions of client trades to other brokers for clearance or settlement to accommodate commission recapture arrangements, if any, or to obtain soft dollar benefits.

IPO ALLOCATIONS

Portfolio managers for eligible accounts have discretion to decline allocations of initial public offerings based upon the client's investment guidelines, objectives, restrictions, cash requirements, or other factors. Under these circumstances, declined allocations are generally presented to the portfolio manager for the next eligible account. We determine accounts eligible to participate in initial public offerings on a quarterly basis.

TRADE ERRORS

On occasion, a trade error may occur in a client account that results in a loss or profit to the client. If a trade error occurs that results in a loss for a client account, we will correct the trade error and we or the broker responsible for the trade error will bear the full amount of the loss.

ITEM 13 – REVIEW OF ACCOUNTS

REVIEWS

Our portfolio managers and analysts meet periodically to review our investment strategies, general economic and market conditions and developments, specific companies and investment ideas, and security-specific issues. Our portfolio managers regularly review and monitor investment performance, securities holdings, sector weightings, asset allocations, and other portfolio characteristics for client accounts. Our administrative personnel regularly perform reconciliations, affirm trades, and perform other administrative activities for client accounts. Our portfolio managers periodically review and monitor client accounts for adherence to the account's investment strategy and guidelines. Client accounts may be reviewed on a more frequent basis depending on a variety of factors, such as changes in market, political or economic conditions, contributions or withdrawals of cash from an account, changes in the account's investment objectives, guidelines or restrictions, or meetings with clients.

REPORTS

Discretionary Accounts

On a quarterly basis, we provide a written portfolio review letter, account statement, and economic outlook. The portfolio review letter is written by the portfolio manager for the account and generally discusses portfolio performance and asset allocations. The account statement generally identifies the positions held in the account at the end of the quarter and summarizes the unrealized gains and losses and income generated by the portfolio during the quarter. The economic outlook generally provides our assessment of historical economic and market conditions as well as our expectations concerning future economic and market conditions. If clients request other written reports, we generally provide those reports at the intervals requested by clients. We also provide written reports and presentations to clients during scheduled client meetings. Clients will also receive quarterly or monthly statements from their custodians, and we urge clients to compare our account statements with those received from their custodians.

Acamar Global Growth Fund

The Acamar Global Growth Fund typically provides a written performance letter and account statement to its limited partners/shareholders on a quarterly basis. The account statements are prepared by the fund administrator. In addition, The Acamar Global Growth Fund also provides audited financial statements of the Fund's operations prepared according to U.S. Generally Accepted Accounting Principles ("U.S. GAAP") to its limited partners/shareholders on an annual basis. This audit is performed by a qualified, independent auditing firm. The Acamar Global Growth Fund also provides limited partners/shareholders with other written reports and information specified in its offering or organizational documents or as determined by us, as the General Partner.

ITEM 14 - CLIENT REFERRALS AND OTHER COMPENSATION

INVESTMENT CONSULTANT DATABASES

Acamar Global may pay consultants, or other third parties, to include information about our investment approaches in databases that they maintain. These databases describe the services provided by investment managers to prospective clients.

RELATIONSHIPS WITH SOLICITORS

In any future solicitation agreements we may enter into, we will ensure we comply with all of the current requirements of Investment Advisers Act regarding disclosures in section 275-206-4-3 and qualified solicitors in section 275-206-4-5 . We do not have any such agreements at this time.

COMPENSATION FROM THIRD PARTIES

Acamar Global does not receive any monetary compensation or any other economic benefit from a non-client for providing investment advisory services to a client.

ITEM 15 - CUSTODY

Discretionary Accounts

We do not have physical custody of your assets or provide custodial services to you. Our proprietary models are currently available through the FOLION^{fn} or Placemark model portfolio platforms. In order to use our services, you must establish a custodial account with a qualified custodian, such as a bank, brokerage firm, or trust company and then request a connection for our models to function with your account. Under no circumstances will we have custody of your accounts. You will receive statements directly from your custodian at least quarterly. We also provide our account statements to you on a quarterly basis. We urge you to review your custodial statements carefully and compare them to the account statements that we provide you. The information in your custodial statements and the statements that we provide you may differ based on accounting procedures, reporting dates, or valuation methodologies of certain securities. Your custodial statement is the official record of your account for tax purposes. Please contact us if you do not receive timely account statements from your custodian.

Acamar Global Growth Fund

All assets of the Fund are held in custody by Interactive Brokers, LLC ("IB") or another unaffiliated qualified custodian. IB is an unaffiliated with the Investment Advisors. Under no circumstances will we have custody of the Fund's accounts. As noted in Item 13 – Review of Accounts, the Fund's certified public accountants will prepare and mail to each Limited Partner, within 90 days following the end of each calendar year of the Fund, an audited financial statement of the Fund's operations prepared according to U.S. Generally Accepted Accounting Principles. Each Limited Partner will also receive unaudited monthly reports of the Fund's operations in such form as the Firm may determine. Following the end of each calendar year, each Partner will also be furnished with certain tax information for the preparation of his or her income tax returns.

ITEM 16 - INVESTMENT DISCRETION

Discretionary Accounts

We usually receive written or oral discretionary authority from the client at the outset of an advisory relationship to select the identity and amount of securities to be bought or sold. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account.

We observe the investment policies, limitations and restrictions of each client when selecting securities and determining trade amounts. For registered investment companies, our authority to trade securities may also be limited by certain federal securities and tax laws that require diversification of investments and favor the holding of investments already made. Any client investment guidelines and restrictions must be provided to us in writing.

Acamar Global Growth Fund

As the General Partner of the Fund, we have sole discretionary operational and investment authority over the investment activities of the Fund. This authority is provided in the offering and organizational documents provided to limited partners/shareholders.

ITEM 17 - VOTING CLIENT SECURITIES

As a matter of firm policy and practice, we do not have any authority to, and do we vote proxies on behalf of advisory clients, regardless of whether the firm has discretionary or non-discretionary authority over securities. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. We may, upon written request, provide advice to clients regarding the client's voting of proxies.

ITEM 18 - FINANCIAL INFORMATION

Registered investment advisers are required in this item to provide you with certain financial information or disclosures about our financial condition. We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to clients, and have not been the subject of a bankruptcy proceeding.

ITEM 19 – REQUIREMENTS FOR STATE REGISTERED ADVISERS

PRINCIPAL OFFICERS AND ADVISORY TEAM MEMBERS

Here is the relevant background of our Key Officers and Investment Professionals:

Rudolph A. Martin, President, Chief Investment Officer, Chief Compliance Officer of the Adviser since October 2007. Rudy started his investment career in 1983, co - managing a \$2 billion private investment portfolio for Transamerica. Later, he went on to Wall Street as an equity analyst for Dean Witter and traveled globally serving major institutional equity investors. In 1995, he joined Fidelity Investments as a Senior Investment Analyst for a series of multi - billion dollar fund portfolios. Rudy Martin founded Latin Capital Market in 2007, (renamed Acamar Global Investments, LLC on December 17, 2012) to provide advisory services to investors interested in undervalued international and emerging markets. He holds a Bachelor's degree from DePaul University and a Master's degree in finance from Northwestern University, Kellogg Graduate School of Management. During his career, Rudy has received awards for institutional investing and is widely quoted in the financial press and on television about topics related to global investing and emerging markets.. Mr. Martin is a member of the Investment Committee at Acamar Global Investments, LLC.

Paul P. Masaracchio

Managing Director of the Adviser since May 2013. Paul started his management career in 1979, as Director of Marketing for the Campbell Soup Company. During his 12 year tenure there, Paul rose to General Manager with responsibility for two brands each with over \$200 million of revenues. Paul's background also includes investing in private equity and serving as Corporate V.P. of Marketing for a publicly-traded real estate development company. After decades as a strategic consultant for corporate clients, he brings his expertise to business development for an institutional investment adviser. He holds a Bachelor degree from Harvard College and a Master of Business Administration from the Harvard Business School. Paul's awards include a David Ogilvy Award for Marketing Excellence and a Gold Effy. Mr. Masaracchio is a member of the Investment Committee at Acamar Global Investments, LLC.

Melissa A. Gannon

Managing Director of the Advisor since August 2013. Melissa has more than 20 years experience in quantitative financial modeling with Weiss Ratings LLC where she managed the development and maintenance of the company's eight quantitative models measuring financial strength and risk-adjusted performance. She holds a Bachelor of Science degree in Business Administration from the University of Dayton (1988) and a Master of Business Administration from Florida Atlantic University (1998). Melissa is frequently quoted in the financial press, online and on television about topics related to funds, banks, insurers and other financial services topics.