

Brochure

Form ADV Part 2A

Item 1 - Cover Page

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October 22, 2014

This brochure provides information about the qualifications and business practices of Stableford Capital, LLC. If you have any questions about the contents of this brochure, please contact us at 770-363-2142 or mark@sixthmanresearch.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state authority.

Stableford Capital, LLC is an investment advisory firm registered with the appropriate regulatory authority. Registration does not imply a certain level of skill or training. Additional information about Stableford Capital, LLC also is available on the SEC's website at www.AdviserInfo.sec.gov.

Item 2 - Material Changes

This Brochure is prepared in the revised format required beginning in 2011. This is the initial Brochure of Stableford Capital, LLC, and is prepared according to the SEC's requirements and rules. In the future, this Item will discuss only specific material changes that are made to the Brochure and will provide clients with a summary of such changes. We will also reference the date of our last annual update of our brochure. We will further provide you with a new Brochure as necessary based on changes, new information, or at your request, at any time, without charge.

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Item 4 - Advisory Business

General Information

Stableford Capital, LLC ("Stableford Capital") was formed in 2014, and provides financial planning and portfolio management services to its clients.

Mark Lapolla is the sole principal owner of Stableford Capital. Please see ***Brochure Supplement***, Exhibit A, for more information on Mr. Lapolla and other individuals who formulate investment advice and have direct contact with clients, or have discretionary authority over client accounts.

Stableford Capital is a newly formed Registered Investment Advisory firm and does not currently have any assets under management.

SERVICES PROVIDED

At the outset of each client relationship, Stableford Capital spends time with the client, asking questions, discussing the client's investment experience and financial circumstances, and reviewing options for the client. Based on its reviews, Stableford Capital generally develops with each client:

- a financial outline for the client based on the client's financial circumstances and goals, and the client's risk tolerance level (the "Financial Profile"); and
- the client's investment objectives and guidelines (the "Investment Plan").

The Financial Profile is a reflection of the client's current financial picture and a look to the future goals of the client. The Investment Plan outlines the types of investments Stableford Capital will make on behalf of the client to meet those goals. The Profile and the Plan are discussed regularly with each client, but are not necessarily written documents.

Portfolio Management

As described above, at the beginning of a client relationship, Stableford Capital meets with the client, gathers information, and performs research and analysis as necessary to develop the client's Investment Plan. The Investment Plan will be updated from time to time when requested by the client, or when determined to be necessary or advisable by Stableford Capital based on updates to the client's financial or other circumstances.

To implement the client's Investment Plan, Stableford Capital will manage the client's investment portfolio on a discretionary basis. As a discretionary investment adviser, Stableford Capital will have the authority to supervise and direct the portfolio without prior consultation with the client.

Notwithstanding the foregoing, clients may impose certain written restrictions on Stableford Capital in the management of their investment portfolios, such as prohibiting the inclusion of certain types of investments in an investment portfolio or prohibiting the sale of certain investments held in the account at the commencement of the relationship. Each client should note, however, that restrictions imposed by a client may adversely affect the composition and performance of the client's investment portfolio. Each client should also note that his or her investment portfolio is treated individually by giving consideration to each purchase or sale for the client's account. For these and other reasons, performance of client investment portfolios within the same investment objectives, goals and/or risk tolerance may differ and clients should not expect that the composition or performance of their investment portfolios would necessarily be consistent with similar clients of Stableford Capital.

Item 5 - Fees and Compensation

General Fee Information

Fees paid to Stableford Capital are exclusive of all custodial and transaction costs paid to the client's custodian, brokers or other third party consultants. Please see ***Item 12 – Brokerage Practices*** for additional information. Fees paid to Stableford Capital are also separate and distinct from the fees and expenses charged by mutual funds, ETFs (exchange traded funds) or other investment pools to their shareholders (generally including a management fee and fund expenses, as described in each fund's prospectus or offering materials). The client should review all fees charged by funds, brokers, Stableford Capital and others to fully understand the total amount of fees paid by the client for investment and financial-related services.

Portfolio Management Fees

The annual fee schedule, based on a percentage of assets under management, is as follows:

\$0 to \$10,000,000	1.00%
Over \$10,000,000	Negotiable

The minimum portfolio value is generally set at \$1,000,000. The minimum annual fee for any account is \$15,000. Stableford Capital may, at its discretion, make exceptions to the foregoing or negotiate special fee arrangements where Stableford Capital deems it appropriate under the circumstances.

Portfolio management fees are generally payable quarterly, in advance. If management begins after the start of a quarter, fees will be prorated accordingly. With client authorization, unless other arrangements are made, fees are normally debited directly from client account(s).

Either Stableford Capital or the client may terminate their Investment Management Agreement at any time, subject to any written notice requirements in the agreement. In the event of termination, any paid but unearned fees will be promptly refunded to the client based on the number of days that the account was managed, and any fees due to Stableford Capital from the client will be invoiced or deducted from the client's account prior to termination.

Item 6 - Performance-Based Fees and Side-By-Side Management

Stableford Capital does not have any performance-based fee arrangements. "Side by Side Management" refers to a situation in which the same firm manages accounts that are billed based on a percentage of assets under management and at the same time manages other accounts for which fees are assessed on a performance fee basis. Because Stableford Capital has no performance-based fee accounts, it has no side-by-side management.

Item 7 - Types of Clients

Stableford Capital serves individuals, high net worth individuals, pension and profit-sharing plans, corporations, and charitable organizations. With some exceptions, the minimum portfolio value eligible for conventional investment advisory services is \$1,000,000, and the annual minimum fee charged is \$15,000. Under certain circumstances and in its sole discretion, Stableford Capital may negotiate such minimums.

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

Methods of Analysis

In accordance with the Investment Plan, Stableford Capital will primarily invest in common stocks, ETFs, and bonds.

Stableford Capital's research process utilizes numerous macro-economic, fundamental, technical and portfolio risk analytical tools and methods.

Stableford Capital's analytical platform is largely built on the Bloomberg terminal system. A proprietary database is also maintained which includes macro-economic models and fundamental and quantitative screens. Stableford Capital has created many customized tools which enables Stableford to synthesize very large cross-sections of market data.

Technical work is proprietary and utilizes the Worden database of approximately 5,000 stocks. With these tools, Stableford Capital can perform analyses across all stocks, market indices, and sector, industry, and ETF classifications.

Fundamental work consists of financial statement analysis, thorough evaluation of Wall Street consensus and, when appropriate, direct communication with company managements.

Mutual funds and ETFs are generally evaluated and selected based on a variety of factors, including, as applicable and without limitation, past performance, fee structure, portfolio manager, fund sponsor, overall ratings for safety and returns, and other factors.

Fixed income investments may be used as a strategic investment, as an instrument to fulfill liquidity or income needs in a portfolio, or to add a component of capital preservation. Stableford Capital may evaluate and select individual bonds or bond funds based on a number of factors including, without limitation, rating, yield and duration.

Investment Strategies:

Stableford Capital's primary investment objective is to produce a compound, long-term total returns which, given prudent risk levels for each household, outpaces inflation and favorably reflects the investment opportunities available over full market cycles.

Philosophy

Stableford Capital's practical understanding of risk is rooted in the pursuit of absolute returns rather than returns relative to index benchmarks. Foundationally, Stableford Capital believes traditional security analysis and portfolio management processes are compromised due to overreliance upon "*expert*" opinions, investment style and asset specializations, and flawed incentive structures linked to relative performance benchmarking.

Accordingly, Stableford Capital seeks to capitalize on the systemic inefficiencies endemic to the markets and the game theory which governs most professional investors. Stableford Capital believes that investment strategies which adhere to theoretical portfolio constructs (*e.g. optimal asset allocation targets, equity portfolios defined by market capitalization strata, investment styles and economic sectors*) materially compromise the potential risk-adjusted investment horizons for the prudent long-term investor.

Process

Stableford Capital believes that prudent and effective asset management requires fundamentally grounded and, quite often, contrarian investment positions. The approach utilizes top down assessments to identify mispriced asset classes and sub-categories (*e.g. technology stocks, high-yield bonds*) which offer the greatest risk-adjusted investment potential.

Stableford Capital's research process is designed to simplify the complex and generate actionable insights which we believe will prove "generally right" rather than "precisely wrong". The advantage stems from our ability to synthesize across asset classes, investment strategies, and geographies, and freedom to leverage experienced intuition and common sense.

Client portfolios reflect our macro-economic assessments and investment themes. They are constructed to optimize the balance between liquidity, value, and appreciation potential. Securities are selected through the application of fundamental and technical analysis and portfolio risk is managed tactically in accordance with each client's risk parameters, tax considerations, and shifting volatility levels across the financial markets.

Risk of Loss

While Stableford Capital seeks to diversify clients' investment portfolios across various asset classes consistent with their Investment Plans in an effort to reduce risk of loss, all investment portfolios are subject to risks. Accordingly, there can be no assurance that client investment portfolios will be able to fully meet their investment objectives and goals, or that investments will not lose money.

Below is a description of several of the principal risks that client investment portfolios face.

Management Risks. While Stableford Capital manages client investment portfolios, based on Stableford Capital's experience, research and proprietary methods, the value of client investment portfolios will change daily based on the performance of the underlying securities in which they are invested. Accordingly, client investment portfolios are subject to the risk that Stableford Capital allocates assets to asset classes that are adversely affected by unanticipated market movements, and the risk that Stableford Capital's specific investment choices could underperform their relevant indexes.

Risks of Investments in Mutual Funds, ETFs and Other Investment Pools. As described above, Stableford Capital may invest client portfolios in mutual funds, ETFs and other investment pools ("pooled investment funds"). Investments in pooled investment funds are generally less risky than investing in individual securities because of their diversified portfolios; however, these investments are still subject to risks associated with the markets in which they invest. In addition, pooled investment funds' success will be related to the skills of their particular managers and their performance in managing their funds. Pooled investment funds are also subject to risks due to regulatory restrictions applicable to registered investment companies under the Investment Company Act of 1940.

Equity Market Risks. Stableford Capital will generally invest portions of client assets directly into equity investments, primarily stocks, or into pooled investment funds that invest in the stock market. As noted above, while pooled investments have diversified portfolios that may make them less risky than investments in individual securities, funds that invest in stocks and other equity securities are nevertheless subject to the risks of the stock market. These risks include, without limitation, the risks that stock values will decline due to daily fluctuations in the markets, and that

stock values will decline over longer periods (e.g., bear markets) due to general market declines in the stock prices for all companies, regardless of any individual security's prospects.

Fixed Income Risks. Stableford Capital may invest portions of client assets directly into fixed income instruments, such as bonds and notes, or may invest in pooled investment funds that invest in bonds and notes. While investing in fixed income instruments, either directly or through pooled investment funds, is generally less volatile than investing in stock (equity) markets, fixed income investments nevertheless are subject to risks. These risks include, without limitation, interest rate risks (risks that changes in interest rates will devalue the investments), credit risks (risks of default by borrowers), or maturity risk (risks that bonds or notes will change value from the time of issuance to maturity).

Foreign Securities Risks. Stableford Capital may invest portions of client assets into pooled investment funds that invest internationally. While foreign investments are important to the diversification of client investment portfolios, they carry risks that may be different from U.S. investments. For example, foreign investments may not be subject to uniform audit, financial reporting or disclosure standards, practices or requirements comparable to those found in the U.S. Foreign investments are also subject to foreign withholding taxes and the risk of adverse changes in investment or exchange control regulations. Finally, foreign investments may involve currency risk, which is the risk that the value of the foreign security will decrease due to changes in the relative value of the U.S. dollar and the security's underlying foreign currency.

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 a client's evaluation of Stableford Capital or the integrity of Stableford Capital's management. Stableford Capital has no disciplinary events to report.

Item 10 - Other Financial Industry Activities and Affiliations

Neither Stableford Capital nor its Management Person has any other financial industry activities or affiliations to report.

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

Code of Ethics and Personal Trading

Stableford Capital has adopted a Code of Ethics ("the Code"), the full text of which is available to you upon request. Stableford Capital's Code has several goals. First, the Code is designed to assist Stableford Capital in complying with applicable laws and regulations governing its investment advisory business. Under the Investment Advisers Act of 1940, Stableford Capital owes fiduciary duties to its clients. Pursuant to these fiduciary duties, the Code requires persons associated with Stableford Capital (managers, officers and employees) to act with honesty, good faith and fair dealing in working with clients. In addition, the Code prohibits such associated persons from trading or otherwise acting on insider information.

Next, the Code sets forth guidelines for professional standards for Stableford Capital's associated persons. Under the Code's Professional Standards, Stableford Capital expects its associated persons to put the interests of its clients first, ahead of personal interests. In this regard, Stableford Capital associated persons are not to take inappropriate advantage of their positions in relation to Stableford Capital clients.

Third, the Code sets forth policies and procedures to monitor and review the personal trading activities of associated persons. From time to time Stableford Capital's associated persons may invest in the same securities recommended to clients. Under its Code, Stableford Capital has adopted procedures designed to reduce or eliminate conflicts of interest that this could potentially cause. The Code's personal trading policies include procedures for limitations on personal securities transactions of associated persons, reporting and review of such trading and pre-clearance of certain types of personal trading activities. These policies are designed to discourage and prohibit personal trading that would disadvantage clients. The Code also provides for disciplinary action as appropriate for violations.

Participation or Interest in Client Transactions

Because associated persons may invest in the same securities as those held in client accounts, Stableford Capital has established a policy requiring its associated persons to pre-clear transactions in certain of these securities with the Chief Compliance Officer. The goal of this policy is to avoid any conflict of interest that may present itself in these situations. Some types of securities, such as CDs, treasury obligations and open-end mutual funds are exempt from this pre-clearance requirement. However, in the event of other identified potential trading conflicts of interest, Stableford Capital's goal is to place client interests first.

Consistent with the foregoing, Stableford Capital maintains policies regarding participation in initial public offerings (IPOs) and private placements to comply with applicable laws and avoid conflicts with client transactions. If a Stableford Capital associated person wishes to participate in an IPO or invest in a private placement, he or she must submit a pre-clearance request and obtain the approval of the Chief Compliance Officer.

Finally, if associated persons trade with client accounts (i.e., in a bundled or aggregated trade), and the trade is not filled in its entirety, the associated person's shares will be removed from the block, and the balance of shares will be allocated among client accounts in accordance with Stableford Capital's written policy.

Item 12 - Brokerage Practices

Best Execution and Benefits of Brokerage Selection

When given discretion to select the brokerage firm that will execute orders in client accounts, Stableford Capital seeks "best execution" for client trades, which is a combination of a number of factors, including, without limitation, quality of execution, services provided and commission rates. Therefore, Stableford Capital may use or recommend the use of brokers who do not charge the lowest available commission in the recognition of research and securities transaction services, or quality of execution. Research services received with transactions may include proprietary or third party research (or any combination), and may be used in servicing any or all of Stableford Capital's clients. Therefore, research services received may not be used for the account for which the particular transaction was effected.

Stableford Capital participates in the Fidelity Institutional Wealth Services ("FIWS") program. While there is no direct link between the investment advice Stableford Capital provides and participation in the FIWS program, Stableford Capital receives certain economic benefits from the FIWS program. These benefits may include software and other technology that provides access to client account data (such as trade confirmations and account statements), facilitates trade execution (and allocation of aggregated orders for multiple client accounts), provides research,

pricing information and other market data, facilitates the payment of Stableford Capital's fees from its clients' accounts, and assists with back-office functions, recordkeeping and client reporting. Many of these services may be used to service all or a substantial number of Stableford Capital's accounts, including accounts not held at Fidelity. Fidelity may also make available to Stableford Capital other services intended to help Stableford Capital manage and further develop its business. These services may include consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance and marketing. In addition, Fidelity may make available, arrange and/or pay for these types of services to be rendered to Stableford Capital by independent third parties. Fidelity may discount or waive fees it would otherwise charge for some of these services, pay all or a part of the fees of a third-party providing these services to Stableford Capital, and/or Fidelity may pay for travel expenses relating to participation in such training. Finally, participation in the FIWS program provides Stableford Capital with access to mutual funds which normally require significantly higher minimum initial investments or are normally available only to institutional investors.

The benefits received through participation in the FIWS program do not necessarily depend upon the proportion of transactions directed to Fidelity. The benefits are received by Stableford Capital, in part because of commission revenue generated for Fidelity by Stableford Capital's clients. This means that the investment activity in client accounts is beneficial to Stableford Capital, because Fidelity does not assess a fee to Stableford Capital for these services. This creates an incentive for Stableford Capital to continue to recommend Fidelity to its clients. While it may be possible to obtain similar custodial, execution and other services elsewhere at a lower cost, Stableford Capital believes that Fidelity provides an excellent combination of these services. These services are not soft dollar arrangements, but are part of the institutional platform offered by Fidelity.

Directed Brokerage

Stableford Capital does not generally allow directed brokerage accounts.

Aggregated Trade Policy

Stableford Capital may enter trades as a block where possible and when advantageous to clients whose accounts have a need to buy or sell shares of the same security. This method permits the trading of aggregate blocks of securities composed of assets from multiple client accounts. It allows Stableford Capital to execute trades in a timely, equitable manner, and may reduce overall costs to clients

Stableford Capital will only aggregate transactions when it believes that aggregation is consistent with its duty to seek best execution (which includes the duty to seek best price) for its clients, and is consistent with the terms of Stableford Capital's Investment Advisory Agreement with each client for which trades are being aggregated. No advisory client will be favored over any other client; each client that participates in an aggregated order will participate at the average share price for all Stableford Capital's transactions in a given security on a given business day. Transaction costs for participating accounts will be assessed at the custodian's commission rate applicable to each account; therefore, transaction costs may vary among accounts. Accounts may be excluded from a block due to tax considerations, client direction or other factors making the account's participation ineligible or impractical.

Stableford Capital will prepare, before entering an aggregated order, a written statement ("Allocation Statement") specifying the participating client accounts and how it intends to allocate the order among those clients. If the aggregated order is filled in its entirety, it will be allocated among clients in accordance with the Allocation Statement. If the order is partially filled, it will

generally be allocated pro-rata, based on the Allocation Statement, or randomly in certain circumstances. Notwithstanding the foregoing, the order may be allocated on a basis different from that specified in the Allocation Statement if all client accounts receive fair and equitable treatment, and the reason for different allocation is explained in writing and is approved by an appropriate individual/officer of Stableford Capital. Stableford Capital's books and records will separately reflect, for each client account included in a block trade, the securities held by and bought and sold for that account. Funds and securities of clients whose orders are aggregated will be deposited with one or more banks or broker-dealers, and neither the clients' cash nor their securities will be held collectively any longer than is necessary to settle the transaction on a delivery versus payment basis; cash or securities held collectively for clients will be delivered out to the custodian bank or broker-dealer as soon as practicable following the settlement, and Stableford Capital will receive no additional compensation or remuneration of any kind as a result of the proposed aggregation.

Item 13 - Review of Accounts

Managed portfolios are reviewed at least quarterly, but may be reviewed more often if requested by the client, upon receipt of information material to the management of the portfolio, or at any time such review is deemed necessary or advisable by Stableford Capital. These factors may include, but are not limited to, the following: change in general client circumstances (marriage, divorce, retirement); or economic, political or market conditions. Mark O. Lapolla Stableford Capital's Managing Member, reviews all accounts.

Account custodians are responsible for providing monthly or quarterly account statements which reflect the positions (and current pricing) in each account as well as transactions in each account, including fees paid from an account. Account custodians also provide prompt confirmation of all trading activity, and year-end tax statements, such as 1099 forms. In addition, Stableford Capital provides a quarterly report for each managed portfolio. This written report normally includes a summary of portfolio holdings and performance results. Additional reports are available at the request of the client.

Item 14 - Client Referrals and Other Compensation

As noted above, Stableford Capital may receive an economic benefit from Fidelity in the form of support products and services it makes available to Stableford Capital and other independent investment advisors that have their clients maintain accounts at Fidelity. These products and services, how they benefit our firm, and the related conflicts of interest are described in ***Item 12 - Brokerage Practices***. The availability of Fidelity's products and services to Stableford Capital is based solely on our participation in the programs and not in the provision of any particular investment advice. Neither Fidelity nor any other party is paid to refer clients to Stableford Capital.

Item 15 - Custody

Fidelity is the custodian of nearly all client accounts at Stableford Capital. From time to time however, clients may select an alternate broker to hold accounts in custody. In any case, it is the custodian's responsibility to provide clients with confirmations of trading activity, tax forms and at least quarterly account statements. Clients are advised to review this information carefully, and to notify Stableford Capital of any questions or concerns. Clients are also asked to promptly notify Stableford Capital if the custodian fails to provide statements on each account held.

From time to time and in accordance with Stableford Capital's agreement with clients, Stableford Capital will provide additional reports. The account balances reflected on these reports should be compared to the balances shown on the brokerage statements to ensure accuracy. At times there may be small differences due to the timing of dividend reporting, pending trades or other similar issues.

Item 16 - Investment Discretion

As described above under ***Item 4 - Advisory Business***, Stableford Capital manages portfolios on a discretionary basis. This means that after an Investment Plan is developed for the client's investment portfolio, Stableford Capital will execute that plan without specific consent from the client for each transaction. For discretionary accounts, a Limited Power of Attorney ("LPOA") is executed by the client, giving Stableford Capital the authority to carry out various activities in the account, generally including the following: trade execution; the ability to request checks on behalf of the client; and, the withdrawal of advisory fees directly from the account. Stableford Capital then directs investment of the client's portfolio using its discretionary authority. The client may limit the terms of the LPOA to the extent consistent with the client's investment advisory agreement with Stableford Capital and the requirements of the client's custodian. The discretionary relationship is further described in the agreement between Stableford Capital and the client.

Item 17 - Voting Client Securities

As a policy and in accordance with Stableford Capital's client agreement, Stableford Capital does not vote proxies related to securities held in client accounts. The custodian of the account will normally provide proxy materials directly to the client. Clients may contact Stableford Capital with questions relating to proxy procedures and proposals; however, Stableford Capital generally does not research particular proxy proposals.

Item 18 - Financial Information

Stableford Capital does not require nor solicit prepayment of more than \$1,200 in fees per client, six months or more in advance, and therefore has no disclosure with respect to this item.