



IARD#: 281496
SEC#: 801-107069

Main Office – Mailing Address:
1801 Bayberry Court, Suite 301, Richmond, VA 23226

Main Business Phone:
(804) 422-8450

Website:
www.acimapw.com

This Brochure provides information about the qualifications and business practices of ACIMA Private Wealth LLC (“ACIMA”, “Firm”, “We”). If the reader has any questions about the contents of this Brochure, please contact the Chief Compliance Officer via telephone at (804) 422-8450. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Additional information about ACIMA also is available on the SEC’s website at www.adviserinfo.sec.gov.

Registration as an Investment Adviser does not imply any level of skill or training. The oral and written communications of an adviser provides information about which a prospective client might determine to hire or retain an adviser.

Part 2A Appendix 1 of Form ADV:

Wrap Fee Program Brochure

Date: March 1, 2016

Item 2 – Material Changes

The Material Changes section of this brochure will be updated at least annually or when material changes occur since the previous release of the Firm Brochure. Pursuant to SEC Rules, we will ensure that you receive a summary of any materials changes to this and subsequent Brochures within 120 days of the close of the Firm's business fiscal year end. We may further provide other ongoing disclosure information about material changes as necessary. This is the Firm's initial Wrap Fee Program Brochure.

A person may also request a copy of this Wrap Fee Program Brochure and the Firm's Form ADV Part 2a at any time by contacting the Chief Compliance Officer at (804) 422-8450.

Item 3 – Table of Contents

Item 1 – Cover Page	1
Item 2 – Material Changes.....	2
Item 3 – Table of Contents	3
Item 4 – Service, Fees and Compensation	4
Item 5 – Account Requirements and Types of Clients	5
Item 6 – Portfolio Manager Selection and Evaluation	5
Item 7 – Client Information Provided to Portfolio Managers.....	9
Item 8 – Client Contact with Portfolio Managers.....	9
Item 9 – Additional Information	9
Item 10 – Requirements for State Registered Advisers.....	11

Item 4 – Service, Fees and Compensation

ACIMA Private Wealth LLC (“ACIMA” or the “Firm” “we” or “us”) is a limited liability company formed in the State of Virginia. ACIMA was founded in May 2015 as a fee-only investment advisory firm with the intent to provide exceptional service to high-net-worth individuals, families, trusts, charitable foundations and institutions. Gary M. Gore is the Founder and Managing Member of ACIMA. ACIMA’s purpose is to implement integrated wealth management solutions that meet the financial needs and reflect the personal values of our clients. The Firm’s focus will be to assist our clients in identifying and achieving their personal and financial objectives in collaboration with their professional advisers.

OVERVIEW OF THE PROGRAM

ACIMA offers a discretionary wrap fee program, known as the “Program,” whereby our investment adviser representative (“IAR”) will manage your assets within a brokerage account for a single fee that includes portfolio management services, financial planning, reporting and transaction costs. In a discretionary account, the customer gives the Firm’s Portfolio Manager the authorization to make purchases and sales in the account without first obtaining the customer’s permission. ACIMA would then provide ongoing investment management, portfolio monitoring and financial plan management services for the client with a minimum household balance of \$5,000,000 or more. Under this program, we offer investment advice designed to assist you with professional management of your investments for a convenient single “wrap fee.” If you participate in the Program, we charge you a specified fee which covers our advisory services and the fees for executing transactions within your account. You may also choose to participate in our “wrap program” without granting discretion. Your agreement will indicate if ACIMA has discretion or not over your account.

FEES AND COMPENSATION

Many factors determine proposed fees rates, including size, complexity and composition of the services to be provided. While fees are negotiable based upon these factors, generally, ACIMA’s investment advisory wrap fee structure will be as follows:

First \$1,000,000	1.25% per year
Next \$2,000,000	1.00% per year
Next \$2,000,000	0.75% per year
Next \$5,000,000	0.65% per year
Over \$10,000,000	0.50% per year

All advisory fees are *inclusive* of brokerage commissions, transactions fees and other related costs and expenses which shall typically be incurred in a client account. Mutual funds, exchanged traded funds and annuities all charge internal management fees and other expenses, which are disclosed in a fund’s or annuity’s prospectus or equivalent disclosure document and are directly deducted from the value of such investment vehicles. ACIMA does not retain 12b-1 fees or other sales charges and commissions on the accounts of advisory clients.

The Program may cost a client more or less than purchasing the services separately. Factors bearing on the relative cost of the Program that would be relevant when considering the alternative of purchasing the services offered in the Program separately include the trading activity in a client’s account and the corresponding brokerage commissions that would be charged for execution of trades, and the fees charged for investment advisory services under the Program. As ACIMA absorbs certain transaction costs under the Program, the Firm may have a financial incentive to not trade frequently since doing so increases transaction costs.

The specific manner in which fees are charged and how much is charged by ACIMA is established in a client’s written agreement with ACIMA. Investment advisory fees are typically billed quarterly in advance and are usually debited by the custodian from a client’s custodial account and remitted by the custodian to ACIMA. The fee will be applied to the client’s closing account balances as of the last day of each calendar quarter.

Asset-based advisory fees are prorated for any significant capital contribution made into a managed account following the initial establishment of a managed account during the applicable calendar quarter as outlined in the client’s written

agreement. Upon termination of any account, any prepaid, unearned fees will be refunded, and any earned, unpaid fees will be due and payable.

The client will provide written authorization permitting the fees to be paid directly from client accounts held by the qualified custodian. Further, the qualified custodian agrees to deliver an account statement at least quarterly directly to the client, indicating all the amounts deducted from the account including all advisory fees and custodial fees. Clients are encouraged to review their account statements for accuracy. ACIMA will receive a duplicate copy of the custodian's statement that is delivered to clients.

In addition to the additional fees discussed above at Mutual Fund Charges, there may be other costs assessed, which are not included in the Program Fee, such as national securities exchange fees; charges for transactions with respect to assets not executed through the custodian, costs associated with exchanging currencies; wire transfer fees; or other fees required by law.

Our firm and IARs receive compensation as a result of your participation in the wrap-fee program. The compensation may be more than the amount our firm or the IAR would receive if you paid separately for investment advice, brokerage, and other services. Accordingly, a conflict of interest exists because our firm and the IARs have a financial incentive to recommend the Program.

Household minimums are subject to negotiation. ACIMA may offer discounted rates to its employees and their families as well as to institutional and very high-net-worth clients with substantial account balances. In certain circumstances, the Firm may assess a flat, annual fee for advisory services.

Item 5 – Account Requirements and Types of Clients

ACIMA provides investment advisory services to individuals, high-net-worth individuals, trusts, endowments, small businesses, family offices and other institutional clients through separately managed accounts. Our typical clients are experienced and comfortable with saving and investing for their retirement and their family's future, board members and/or trustees acting on behalf of the trust for an organization they represent, and employers/business owners looking for an advisory group to assist them in making prudent investment decisions. A minimum account balance of \$5,000,000 will typically be required in order to participate in the Program.

Item 6 – Portfolio Manager Selection and Evaluation

ACIMA serves as both the Sponsor and Portfolio Manager of the wrap fee program. As a Firm, we maintain approval standards for IARs who wish to participate as a Portfolio Manager in the wrap fee program. Each IAR candidate provides the Firm with background information that includes, but is not limited, to the following items:

- Investment philosophy and management style.
- Years of industry experience.
- Educational background, including graduate and undergraduate degrees.
- Professional designations.
- Disciplinary history for 10 years.
- Credit history for 10 years.

We verify and evaluate the above-referenced information as part of our due diligence for accepting an IAR as a Portfolio Manager in the Program. In many instances, the IAR already has a successful advisory relationship with the client and the IAR utilizes the Program as an additional tool for managing client assets.

As ACIMA IARs may act as Portfolio Managers, the following information is provided to more fully describe the portfolio management services to be provided by the Firm.

METHODS OF ANALYSIS

ACIMA may use any of the following methods of analysis in formulating their investment advice and/or managing client assets:

Fundamental Analysis. We attempt to measure the intrinsic value of a security by looking at economic and financial factors (including the overall economy, industry conditions, and the financial condition and management of the company itself) to determine if the company is underpriced (indicating it may be a good time to buy) or overpriced (indicating it may be time to sell). Fundamental analysis does not attempt to anticipate market movements. Doing so presents a potential risk, as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the stock.

Technical Analysis. We analyze past market movements and apply that analysis to the present in an attempt to recognize recurring patterns of investor behavior and potentially predict future price movement. Technical analysis does not consider the underlying financial condition of a company. Doing so presents a risk in that a poorly-managed or financially unsound company may underperform regardless of market movement.

Cyclical Analysis. In this type of technical analysis, we measure the movements of a particular stock against the overall market in an attempt to predict the price movement of the security.

Quantitative Analysis. We use mathematical models in an attempt to obtain more accurate measurements of a company's quantifiable data, such as the value of a share price or earnings per share, and predict changes to that data. A risk in using quantitative analysis is that the models used may be based on assumptions that prove to be incorrect.

Qualitative Analysis. We subjectively evaluate non-quantifiable factors such as quality of management, labor relations, and strength of research and development factors not readily subject to measurement, and predict changes to share price based on that data. A risk in using qualitative analysis is that our subjective judgment may prove incorrect.

Asset Allocation. Rather than focusing primarily on securities selection, we attempt to identify an appropriate ratio of securities, fixed income, and cash suitable to the client's investment goals and risk tolerance. A risk of asset allocation is that the client may not participate in sharp increases in a particular security, industry or market sector. Another risk is that the ratio of securities, fixed income, and cash will change over time due to stock and market movements and, if not corrected, will no longer be appropriate for the client's goals.

Mutual Fund and/or ETF Analysis. We look at the experience and track record of the manager of the mutual fund or ETF in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. We also look at the underlying assets in a mutual fund or ETF in an attempt to determine if there is significant overlap in the underlying investments held in another fund(s) in the client's portfolio. We also monitor the funds or ETFs in an attempt to determine if they are continuing to follow their stated investment strategy. A risk of mutual fund and/or ETF analysis is that, as in all securities investments, past performance does not guarantee future results. A manager who has been successful may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in a fund or ETF, managers of different funds held by the client may purchase the same security, increasing the risk to the client if that security were to fall in value. There is also a risk that a manager may deviate from the stated investment mandate or strategy of the fund or ETF, which could make the holding(s) less suitable for the client's portfolio.

Our securities analysis methods rely on the assumption that the companies whose securities we purchase and sell, the rating agencies that review these securities, and other publicly-available sources of information about these securities are providing accurate and unbiased data. While we are alert to indications that data may be incorrect, there is always a risk that our analysis may be compromised by inaccurate or misleading information.

INVESTMENT STRATEGIES

ACIMA may use any of the following strategy(ies) in managing client accounts, provided that such strategy(ies) are appropriate to the needs of the client and consistent with the client's investment objectives, risk tolerance and time horizon.

Long-term purchases. ACIMA may purchase securities with the idea of holding them in the client's account for a year or longer. Typically, we employ this strategy when we believe the securities to be currently undervalued, and/or we want

exposure to a particular asset class over time, regardless of the current projection for this class. A risk in a long-term purchase strategy is that by holding the security for this length of time, we may not take advantage of short-term gains that could be profitable to a client. Moreover, if our predictions are incorrect, a security may decline sharply in value before we make the decision to sell.

Short-term purchases. When utilizing this strategy, ACIMA purchases securities with the idea of selling them within a relatively short time (typically a year or less). We do this in an attempt to take advantage of conditions that we believe will soon result in a price swing in the securities we purchase.

Tactical asset allocation. With this strategy, ACIMA may use a range of percentages in each asset class; minimum and maximum percentages permit clients to take advantage of market conditions within these parameters. The percentages are guidelines only.

Strategic asset allocation. ACIMA will set target allocations with this strategy, which will be periodically rebalanced to maintain desired allocation percentages. The allocation may change over time as clients objectives change.

RISK OF LOSS

Based upon ACIMA's analysis of the client's financial situation and financial plan, ACIMA will recommend an appropriate investment strategy for the client's accounts; however, all investment strategies have a risk of loss. Investing in securities involves certain risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. While risk can be, and by common industry practice often is, measured by the degree of unpredictability of a given portfolio's return in any given period, it also includes the possibility of losing some or all of an original investment. Even the most conservative investment strategy is subject to risk.

All investment programs carry the risk of loss and there is no guarantee that any recommended investment strategy will meet its objectives.

All investment strategies inherently expose our clients to various types and varying degrees of risk. Below, we discuss those risks in greater detail:

- **Political Risks.** Most investments have a global component, even domestic stocks. Political events anywhere in the world may have unforeseen consequences to markets around the world.
- **General Market Risks.** Markets can, as a whole, go up or down after various news releases or for no understandable reason at all. This sometimes means that the price of specific securities could go up or down without real reason, and may take some time to recover any lost value. Adding additional securities does not help to minimize this risk since all securities may be affected by market fluctuations.
- **Currency Risk.** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Derivatives Risk.** Investments in futures and options are considered "derivative" investments. A small investment in derivatives could have a potentially large impact on performance. The use of derivatives involves risks different from or possibly greater than the risks associated with investing directly in the underlying assets. Derivatives can be highly volatile, illiquid and difficult to value. There is the risk that the hedging technique will fail if changes in the value of a derivative held do not correlate with the portfolio securities being hedged.
- **Regulatory Risk.** Changes in laws and regulations from any government can change the value of a given company and its accompanying securities. Certain industries are more susceptible to government regulation. Changes in zoning, tax structure or laws impact the return on these investments.
- **Risks Related to Investment Term.** If a client requires a liquidation of their portfolio during a period in which the price of the security is low, the client may not realize as much value as they might have had the investment had the opportunity to regain its value, as investments frequently do, or had it been able to be reinvested in another security.

- **Purchasing Power Risk.** Purchasing power risk is the risk that an investment's value will decline as the price of goods rises (inflation). The investment's value itself does not decline, but its relative value does. Inflation can happen for a variety of complex reasons, including a growing economy and a rising money supply.
- **Business Risk.** Many investments, including many Index Funds and Target-Date Funds, contain interests in operating businesses. Business risks are risks associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- **Liquidity Risk.** Liquidity is the ability to readily convert an investment into cash. For example, Treasury Bills are highly liquid, while real estate properties are not. Some securities are highly liquid while others are highly illiquid. Illiquid investments carry more risk because it can be difficult to sell them.
- **Financial Risk.** Many investments, including many Index Funds and Target-Date Funds, contain interests in operating businesses. Excessive borrowing to finance a business' operations decreases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.
- **Default Risk.** This risk pertains to the ability of a company to service their debt. Ratings provided by several rating services help to identify those companies with more risk. Obligations of the U.S. government are said to be free of default risk.
- **Management Risk.** Investments may vary with the success and failure of investment strategies selected and implemented by the management of this Firm. If investment strategies do not produce the expected returns, the value of investments may decrease.
- **Risk Associated with Options.** Options carry no guarantees, and there is a possibility of losing the entire principal invested, and sometimes more. As an options holder, clients risk the entire amount of the premium paid. Options writers may face unlimited potential loss, for example, with an uncovered call, since there is no cap on how high a stock price can rise. Options on securities may also be subject to greater fluctuations in value than an investment in the underlying securities. Purchasing and writing put and call options are highly specialized activities and entail greater than ordinary investment risks.
- **Risks Associated with Private Placement Offerings.** Because private placement offerings are exempt from registration requirements at both the state and federal level, no regulator has reviewed the offerings to make sure the risks associated with the investment and all material facts about the entity raising money are adequately disclosed. Securities offered through private placements are generally illiquid, meaning there are limited opportunities to resell the security.
- **Risks Associated with Alternative Investments.** Alternative investment products, including real estate investments, notes & debentures, hedge funds and private equity involve a high degree of risk, often engage in leveraging and other speculative investment practices that may increase the risk of investment loss, can be highly illiquid, are not required to provide periodic pricing or valuation information to investors, may involve complex tax structures and delays in distributing important tax information, are not subject to the same regulatory requirements as mutual funds, often charge high fees which may offset any trading profits, and, in many cases, the underlying investments are not transparent and are known only to the investment manager. Alternative investment performance can be volatile. An investor could lose all or a substantial amount of the investment. Often, alternative investment funds and account managers have total trading authority over their funds or accounts; the use of a single adviser applying generally similar trading programs could mean lack of diversification and, consequently, higher risk. There is often no secondary market for an investor's interest in alternative investments, and none is expected to develop. There may be restrictions on transferring interests in any alternative investment. Alternative investment products often execute a substantial portion of their trades on non-U.S. exchanges. Investing in foreign markets may entail risks that differ from those associated with investments in U.S. markets. Additionally, alternative investments often entail commodity trading, which involves substantial risk of loss.

PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

ACIMA will not charge performance-based fees where an adviser's fee would be based on a share of capital gains or capital appreciation of the client assets. As such, there are no conflicts of interest to disclose at this time.

VOTING CLIENT SECURITIES

As a matter of firm policy and practice, ACIMA does not accept any authority to and does not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in accounts. All proxy notices are forwarded directly to the clients by the account custodians as has been indicated on the client's custodial account application. Within ACIMA's written agreements, proxy voting responsibility remains specifically with the client.

A complete copy of ACIMA's proxy voting policy can be obtained by sending a request to ACIMA's Chief Compliance Officer via telephone at (804) 422-8450. If a client has a question regarding a proxy notice that they have received, they should speak with their investment adviser to review the content of the proxy. However, the decision as to how to vote a proxy will remain with the client.

Item 7 – Client Information Provided to Portfolio Managers

As the Sponsor and Portfolio Manager, ACIMA does not provide your personal non-public information to an outside portfolio manager. Our firm has adopted a Privacy Policy, in accordance with Regulation S-P under section 504 of the Gramm-Leach-Bliley Act, which restricts our firm and our IARs use of and access to your nonpublic personal information. Our IARs have access to your information on an as needed basis in order to service your needs under the Program. In order for us and our IARs to effectively manage your account and assist you in meeting your financial objectives, you must update us as soon as possible when any changes to your personal or financial information occur. You may obtain a complete copy of our Privacy Policy by contacting our main office at the number on the front of this brochure.

Item 8 – Client Contact with Portfolio Managers

As the Sponsor and Portfolio Manager, ACIMA places no restrictions on a client's ability to contact and consult with the Portfolio Manager. A client should contact their IAR to arrange a meeting with ACIMA's Portfolio Manager.

Item 9 – Additional Information

DISCIPLINARY INFORMATION

ACIMA does not have any legal, financial or other "disciplinary" item to report. ACIMA is obligated to disclose any disciplinary event that would be material to a client or perspective client when evaluating to initiate a Client/Adviser relationship, or to continue a Client /Adviser relationship with ACIMA. This statement applies to ACIMA and all employees registered with ACIMA.

OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

Other Providers - ACIMA also maintains professional business relationships with various legal, accounting, recordkeeping, third-party administrators (TPAs) and other investment advisory and consulting firms both locally and around the country. These informal relationships are created to share industry information and insight. ACIMA does not receive any compensation or shared revenue with any of these entities; therefore these relationships hold no conflict of interest for our clients.

Third-Party Investment Advisers - ACIMA may offer clients a specific third-party investment management program made available directly to ACIMA for our clients. These third-party managers are referred to as “separate account managers”. ACIMA receives no direct or indirect compensation from the third-party managers or sub-advisers for these arrangements.

Solicitation Arrangements - ACIMA does not currently participate in any solicitation arrangements.

CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

The employees of ACIMA have committed to a Code of Ethics that establishes a high standard of integrity and professional ethics when conducting business with the Firm, its clients and its business vendors and partners. All ACIMA associates are required to review and sign a formal Code of Ethics adopted to comply with Rule 204(A)-1.

ACIMA's Code of Ethics provides for 1) a high ethical standard of conduct; 2) compliance with all federal securities laws; and 3) policies and procedures for the reporting of certain personal securities transactions on a quarterly basis as well as upon hire, and annually for all ACIMA's professionals and employees. The Chief Compliance Officer of ACIMA reviews on a regular basis employee personal trading accounts. The Chief Compliance Officer's trades are reviewed by the Chief Executive Officer of ACIMA or his designee. These reviews help ensure that the personal trading of employees complies with ACIMA's Code of Ethics.

ACIMA does not recommend to clients securities in which ACIMA or its related persons have a material financial interest. It should be noted that some employees of ACIMA can be considered clients of the Firm and will have their personal trading accounts managed by the Firm's portfolio managers alongside its client's accounts. We do not feel this presents a conflict of interest because the minimal exposure that ACIMA's overall ownership of these securities (through client and employee accounts) would not have a significant impact on their pricing given the large capitalization and market liquidity of the securities recommended.

A copy of ACIMA's Code of Ethics is available to ACIMA's advisory clients upon written request to ACIMA's office address or by calling the Chief Compliance Officer at (804) 422-8450.

REVIEW OF ACCOUNTS

The Adviser will regularly monitor the investments in client accounts and perform at least quarterly reviews of account holdings for all clients. Client accounts are reviewed for consistency with client investment strategy and objectives, compliance with investment restrictions provided by the client, asset allocation, risk tolerance and performance relative to the appropriate benchmark. More frequent reviews may be triggered by changes in a clients' personal, tax or financial status.

ACIMA monitors on a continuous basis the securities it recommends for its client's portfolios. Clients will receive monthly statements from the custodian for each household account held by the custodian. If the client's account has no activity, the custodian, at a minimum, will provide a quarterly statement. The custodian's statement will include information about the assets held in the account, the current value of each asset, as well as reflect the deduction of any fees from the client's account. Clients are encouraged to review their statements for discrepancies.

CLIENT REFERRALS AND OTHER COMPENSATION

ACIMA and its representatives do not receive any sales awards or prizes as compensation from any third party provider that it recommends. The receipt of such gifts would be a violation of ACIMA's Code of Ethics.

As a matter of policy and practice, ACIMA does not compensate any third-party persons, either individuals or entities, for the referral of advisory clients to the firm unless a formal solicitor's agreement has been entered into with a Registered Investment Adviser Representative (“RIAR”) or with such person's supervising firm which is a Registered Investment Adviser (“RIA”). ACIMA does not increase its advisory fees in order to compensate a solicitor. The solicitor receives a portion of the advisory fee collected.

When such an agreement is entered into, it specifies the percentage of the client fees that are to be paid as solicitor's fees and requires the solicitor to provide written disclosure of his arrangement with ACIMA, including his or her method of compensation, to the client via a signed disclosure statement. The client's countersignature is required on the disclosure statement prior to ACIMA executing any trades.

OTHER ECONOMIC BENEFITS

At this time, for ACIMA's advisory clients, the preferred custodian will be Schwab Advisor Services, a division of Charles Schwab & Co., Inc. ("Schwab"), a registered broker-dealer, member SIPC, to maintain custody of clients' assets and to effect trades for their accounts. Due to this relationship, ACIMA receives an economic benefit from Schwab in the form of support products and services which it makes available to us and other advisers that have their clients maintain accounts at Schwab. The products and services, how they benefit ACIMA, and the related conflicts of interest are described in the Firm's Form ADV Part 2A brochure under Item 12 – Brokerage Practices. The Firm's Form ADV Part 2A is available upon request at any time by calling the Chief Compliance Officer at (804) 422-8450.

FINANCIAL INFORMATION

Registered Investment Advisers are required in this Item to provide certain financial information or disclosures about their financial condition. ACIMA has no financial commitment or condition that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.

A balance sheet is not required to be provided because ACIMA does not serve as a custodian for client funds or securities and does not require prepayment of fees of more than \$1,200 per client six months or more in advance.

Item 10 – Requirements for State Registered Advisers

ACIMA is a federally-registered investment adviser - this item is not applicable.