

Item 1 – Cover Page

Part 2A of Form ADV

Brochure for:

55 CAPITAL PARTNERS LLC

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March 28, 2017

This Brochure provides information about the qualifications and business practices of 55 Capital Partners, LLC (herein “55 Capital” or the “Firm”). If you have any questions about the contents of this Brochure, please contact the Firm at the address listed above. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or by any state securities authority.

55 Capital Partners LLC is a registered investment adviser. Registration of an investment adviser does not imply any certain 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 55 Capital is also available on the SEC’s website at www.adviserinfo.sec.gov. 55 Capital’s CRD number is 286620.

Item 2 – Material Changes

This Item of the Brochure discusses only specific material changes that are made to the Brochure since the last annual update and provides clients with a summary of such changes. Since this is our initial registration filing, there are no applicable changes.

Currently, our brochure may be requested by contacting our Chief Compliance Officer at (415) 634-8530.

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Item 4 – Advisory Business

A. Description of the Advisory Firm

55 Capital Partners LLC (“55 Capital”), a Delaware limited liability company, was formed on August 17, 2015. 55 Capital is primarily owned by LVH, LLC. Bruce Lavine is the Chief Executive Officer of 55 Capital. The majority of 55 Capital’s business involves providing investment management services, as described in detail below, as well as providing investment supervisory services as defined in Section 202(a)(13) of the Investment Advisers Act of 1940 (hereafter, “The Act”).

B. Types of Advisory Services

55 Capital provides investment advice and portfolio management services to separately managed accounts, including individuals, small businesses, and business and institutional clients (the “Clients”).

Pursuant to each Client’s investment advisory agreement with 55 Capital (each, an “Advisory Agreement”), 55 Capital provides investment advice and portfolio management services with the objective of achieving risk-adjusted returns by creating globally diversified portfolios of Exchange Traded Funds (ETFs). 55 Capital will allocate the client’s assets among various investments taking into consideration the overall management style selected by the client.

C. Client Tailored Services and Client Imposed Restrictions

Advisory services are tailored to achieve Clients’ investment objectives. Generally, 55 Capital has the authority to select which and how many securities and other instruments to buy or sell without consultation with the Clients. Clients may impose reasonable restrictions on investing in certain securities or types of securities, with any restrictions to be set forth in such Client’s Advisory Agreement.

D. Wrap Fee Programs

55 Capital does not participate in wrap fee programs.

E. Amounts Under Management

Since this is 55 Capital’s initial registration document, it presently does not manage any assets under management.

Discretionary Amounts:	Non-Discretionary Amounts:	Date Calculated:
None	\$0	March 27, 2017

Item 5 – Fees and Compensation

A. Fee Schedule

The fees and compensation payable to 55 Capital are negotiable and vary among its Clients. However, the range of compensation is generally as follows:

1. Management Fee

55 Capital typically receives a monthly asset-based management fee calculated as a percentage of the average of each separate account for such month. Are fees are charged monthly in arrears. The management fee schedule for the separate account is below:

Management Fee	First \$2 million
Global Allocation Strategy	0.35%
Global Equity Strategy	0.50%
Dynamic Macro Strategy	0.75%
Alternative Strategy	0.80%
Global Bonds Strategy	0.40%

55 Capital may, in its sole discretion, reduce, waive or calculate differently the management fee with respect to any Client.

2. Incentive Fee

55 Capital may receive an incentive based fee from qualified Clients. An incentive based fee is a fee charged on the basis of a share of capital gains or capital appreciation of the funds or any portion of the funds of an advisory client. Performance fee arrangements with qualified clients are negotiated with clients on a case by case basis. Performance based fee arrangements may create an incentive for 55 Capital to recommend investments which may be riskier or more speculative than those which would be recommended under a different fee arrangement. Such fee arrangements also create an incentive to favor higher fee paying accounts over other accounts in the allocation of investment opportunities.

55 Capital has procedures designed and implemented to ensure that all clients are treated fairly and equally, and to prevent this conflict from influencing the allocation of investment opportunities among clients. Only "qualified clients" will be eligible for performance-based fee arrangements.

The performance-based fee arrangement is fully disclosed within the investment management agreement presented to the client. The client must understand the proposed method of compensation and its risks prior to entering into the investment management agreement.

B. Payment of Fees

Management fees and third-party fees (discussed below) are deducted from Client assets. Management fees, which are paid in arrears, are withdrawn at the end of each quarter. Pursuant to each Client's Advisory Agreement, the Client authorizes the direct deduction or withdrawal of any management fees to be paid to 55 Capital.

C. Third-Party Fees

The Clients shall pay such costs and expenses as 55 Capital shall reasonably determine to be necessary, appropriate, advisable or convenient to realize each Client's investment objective, including but not limited to: (i) management fees; (ii) all general investment expenses; (iii) all operating and administration expenses, including but not limited to, all custodial fees, accounting, brokerage commissions, clearing fees, borrowing charges, interest on margin and other borrowings, and taxes incurred in connection with the Client's account; and (iv) such other expenses as may be set forth in each Client's Advisory Agreement.

55 Capital's fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the Clients. Such charges, fees and commissions are exclusive of and in addition to 55 Capital's management fee, and 55 Capital shall not receive any portion of these commissions, fees, and costs.

Please see Item 12 of this Brochure regarding brokerage.

D. Prepayment of Fees

An advisory agreement may be canceled at any time, by the client, for any reason upon receipt of written notice and by 55 Capital, for any reason, upon 10 days' prior written notice. Upon termination of any account, any unpaid earned fees will be due and payable and may be billed to the client through the mail.

E. Outside Compensation for the Sale of Securities

Neither 55 Capital nor its supervised persons accepts compensation for the sale of securities or other investment products outside of its association with 55 Capital.

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

Please refer to Item 5.A. for a discussion on the incentive based fees from its Clients.

Item 7 – Types of Clients

55 Capital provides investment advice and portfolio management services to individuals, high-net worth individuals, small businesses, charitable institutions, foundations, trusts, and other types of businesses via separately managed accounts.

The minimum amount of assets under management for a separate account is \$100,000. 55 Capital may, in its sole discretion, waive the minimum investment requirement for any separate account

client. Generally, similar terms will apply to Clients, though certain Clients may have terms that differ or are more favorable than those for other Clients.

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

A. Methods of Analysis

55 Capital utilizes fundamental analysis, as further described below, to construct diversified portfolios, focusing on various areas and issues in the global macro environment.

B. Investment Strategies

Pursuant to each Client's Advisory Agreement, 55 Capital invests Clients' assets in accordance with each Client's stated investment objectives and risk tolerance. Generally, investment objectives will be to achieve risk-adjusted returns by composing diversified portfolios using a global macro strategy. 55 Capital implements its strategy by conducting fundamental analysis based on three principles: focusing on expanding asset classes across different varieties of assets; utilizing global macro signals to create better risk/return characteristics within asset classes; and adjusting for risk using volatility capture. 55 Capital will primarily invest Client assets in ETFs based on various types of securities or assets in U.S. and foreign developed or emerging markets, including but not limited to, equity and debt securities, treasuries and real estate, in addition to certain foreign commodities and currencies. 55 Capital may also invest in other types of securities, including, but not limited to, certain derivative instruments.

C. Risks of Investments and Strategies Utilized

Investing in securities involves risk of loss that Clients should be prepared to bear.

The following are a summary of the investment and trading risk factors associated with a separately managed account:

General Investment and Trading Risks. Clients may invest in securities and other financial instruments using strategies and investment techniques with significant risk characteristics. The investment program utilizes such investment techniques as option transactions, margin transactions, short sales, leverage and derivatives trading, the use of which can, in certain circumstances, maximize the adverse impact to which a Client may be subject.

Exchange Traded Funds. ETFs are a type of index fund bought and sold on a securities exchange. The risks of owning an ETF generally reflect the risks of owning the underlying securities they are designed to track, although lack of liquidity in an ETF could result in it being more volatile and ETFs have management fees that increase their costs. ETFs are also subject to other risks, including: (i) the risk that their prices may not correlate perfectly with changes in the underlying index; and (ii) the risk of possible trading halts due to market conditions or other reasons that, in the view of the exchange upon which an ETF trades, would make trading in the ETF inadvisable.

Common Stocks and Equity-Related Securities. Prices of common stock react to the economic condition company that issued the security, industry and market conditions, and other factors and may fluctuate widely. Investments related to the value of stocks may rise and fall based on an issuer's

actual and anticipated earnings, changes in management, the potential for takeovers and acquisitions, and other economic factors. Similarly, the value of other equity-related securities, including preferred stock, warrants and options may also vary widely.

Small- and Mid-Cap Risks. Securities of small-cap issuers may present greater risks than those of large-cap issuers. For example, some small- and mid-cap issuers often have limited product lines, markets, or financial resources. They may be subject to high volatility in revenues, expenses and earnings. Their securities may be thinly traded, may be followed by fewer investment research analysts and may be subject to wider price swings and thus may create a greater chance of loss than when investing in securities of larger-cap issuers. The market prices of securities of small- and mid-cap issuers generally are more sensitive to changes in earnings expectations, to corporate developments and to market rumors than are the market prices of large-cap issuers.

Currency. 55 Capital may invest Client assets in currencies or assets in instruments denominated in currencies other than the U.S. dollar, the price of which is determined with reference to currencies other than the U.S. dollar. Client accounts will, however, be valued in U.S. dollars. To the extent unhedged, the value of the assets will fluctuate with U.S. dollar exchange rates as well as the price changes of investments in the various local markets and currencies. Thus, an increase in the value of the U.S. dollar compared to the other currencies will reduce, all other economic factors being constant, the effect of increases and magnify the effect of decreases in the prices of the account's securities in their local markets. Conversely, a decrease in the value of the U.S. dollar will have the opposite effect on non-U.S. dollar securities.

Futures, Commodities, and Derivative Investments. The prices of commodities contracts and derivative instruments, including futures and options, are highly volatile. Payments made pursuant to swap agreements may also be highly volatile. Price movements of commodities, futures and options contracts and payments pursuant to swap agreements are influenced by, among other things, interest rates, changing supply and demand relationships, trade, fiscal, monetary and exchange control programs and policies of governments, and national and international political and economic events and policies. The value of futures, options and swap agreements also depends upon the price of the commodities underlying them. In addition, client assets are also subject to the risk of the failure of any of the exchanges on which its positions trade or of its clearinghouses or counterparties.

Highly Volatile Markets. The prices of financial instruments can be highly volatile. Price movements of forward and other derivative contracts are influenced by, among other things, interest rates, changing supply and demand relationships, trade, fiscal, monetary and exchange control programs and policies of governments, and national and international political and economic events and policies. Clients are also subject to the risk of failure of any of the exchanges on which their positions trade or of its clearinghouses.

Use of Leverage and Financing. A Client may pledge its securities in order to borrow additional funds for investment purposes. Any event which adversely affects the value of an investment by the Client would be magnified to the extent the Client is leveraged. The cumulative effect of the use of leverage by a Client in a market that moves adversely to the Client's investments could result in a substantial loss that would be greater than if the client were not leveraged.

Hedging Transactions. While a Client may enter into hedging transactions to seek to reduce risk, such transactions may result in a poorer overall performance for the Client than if it had not engaged in any such hedging transactions. For a variety of reasons, 55 Capital may not seek to establish a perfect correlation between such hedging instruments and the portfolio holdings being hedged. Such imperfect correlation may prevent a Client from achieving the intended hedge or expose the Client to risk of loss.

Derivatives and Hedging. Derivatives are financial instruments or arrangements in which the risk and return are related to changes in the value of other assets, reference rates or indices. A Client's ability to profit or avoid risk through investment or trading in derivatives will depend on 55 Capital's ability to anticipate changes in the underlying assets, reference rates or indices.

Debt and Other Income Securities. Income and fixed-income securities are subject to interest rate, market and credit risk. Interest rate risk relates to changes in a security's value as a result of changes in interest rates generally, and are subject to the risk of market price fluctuations. Adjustable rate securities are less likely than non-adjustable rate securities of comparable quality and maturity to increase or decrease significantly in value when market interest rates fall or rise, respectively. Market risk relates to the changes in the risk or perceived risk of an issuer, industry, country or region. Credit risk relates to the ability of the issuer to make payments of principal and interest. The values of income securities may be affected by changes in the credit rating or financial condition of the issuing entities. Income securities denominated in non-U.S. currencies are also subject to the risk of a decline in the value of the denominating currency relative to the U.S. dollar.

Real Estate Investments. Special risks associated with real estate investments include, without limitation, changes in the general economic climate or local conditions (such as an oversupply of space or a reduction in demand for space), competition based on rental rates, attractiveness and location of the properties, changes in the financial conditions of tenants and changes in operating costs. Real estate values are also affected by factors such as government regulations (including those governing usage, improvements, zoning and taxes), interest rate levels and the availability of financing and potential liability under environmental and other laws.

Non-U.S. Securities. Investments in securities of non-U.S. issuers pose a range of potential risks which could include expropriation, confiscatory taxation, imposition of withholding or other taxes on dividends, interest, capital gains or other income, political or social instability, illiquidity, price volatility and market manipulation. In addition, less information may be available regarding securities of non-U.S. issuers, and non-U.S. issuers may not be subject to accounting, auditing and financial reporting standards and requirements comparable to or as uniform as those of U.S. issuers.

Emerging Markets. In addition to the risks associated with investments outside of the United States, investments in emerging markets (i.e., the developing countries) may involve additional risks. Emerging markets generally are not as efficient as those in developed countries. In some cases, a market for the security may not exist locally, and transactions will need to be made on a neighboring exchange. Volume and liquidity levels in emerging markets are lower than in developed countries. When seeking to sell emerging market securities, little or no market may exist for the securities. In addition, issuers based in emerging markets are not generally subject to uniform accounting and financial reporting standards, practices and requirements comparable to those applicable to issuers

based in developed countries, thereby potentially increasing the risk of fraud or other deceptive practices.

More information about the Client's investments and the associated risk factors is available in the Advisory Agreement.

The foregoing list of risk factors does not purport to be a complete enumeration or explanation of the risks involved in an investment with 55 Capital. Prospective Clients should read the entire Brochure as well as the Advisory Agreement and/or any other materials that may be provided by 55 Capital and consult with their own advisers prior to engaging 55 Capital's services.

Item 9 – Disciplinary Information

55 Capital and its management persons have not been a party to any legal or disciplinary events that would be material to a client's or prospective client's evaluation of its investment advisory business or the integrity of its management.

Item 10 – Other Financial Industry Activities and Affiliations

A. Registration as a Broker-Dealer or Broker-Dealer Representative

Neither 55 Capital nor its management persons are registered as a broker-dealer or broker-dealer representative.

B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

Neither 55 Capital nor its management persons are registered as futures commission merchant, commodity pool operator, or a commodity trading adviser.

C. Relationships Material to this Advisory Business and Possible Conflicts of Interest

Mr. Lavine, Chief Compliance Officer, is a Member of the Board of Directors of WisdomTree Investments, Inc. ("WisdomTree"). WisdomTree is an ETF sponsor and asset manager. 55 Capital does not at this time have any business dealings with WisdomTree in connection with advisory services it provides to Clients and does not believe that there are any material conflicts related to Mr. Lavine's relationship with WisdomTree.

55 Capital provides management and investment advisory services to Clients that follow investment programs similar to or different from one another. A number of actual and potential conflicts of interest between the Clients could exist, including the possibility of conflict with respect to the allocation of investment opportunities among the Clients. 55 Capital has sole discretion to resolve such conflicts as it determines to be appropriate, consistent with its fiduciary duties to Clients.

D. Selection of Other Advisers or Managers

55 Capital does not utilize nor select other advisers or third party managers. All assets are managed by 55 Capital.

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

A. Code of Ethics

55 Capital has adopted a Code of Ethics (the “Code”) pursuant to Rule 204A-of the Advisers Act applicable to all supervised persons of the firm describing its high standard of business conduct and fiduciary duty to its clients. The Code governs the activities of each member, officer, director and employee of 55 Capital (collectively, “Employees”). 55 Capital holds its Employees to a high standard of integrity and business practices that reflects its fiduciary duty to the Client. In serving its Client, 55 Capital strives to avoid conflicts of interest or the appearance of conflicts of interest in connection with the personal trading activities of its Employees and Client securities transactions. When persons covered by the Code engage in personal securities transactions, they must adhere to the following general principles as well as to the Code’s specific provisions: (a) at all times the interests of the Client must be paramount; (b) personal transactions must be conducted consistent with the Code in manner that avoids any actual or potential conflict of interest; and (c) no inappropriate advantage should be taken of any position of trust and responsibility. Employees covered by the Code have certain trading restrictions and reporting obligations of their personal securities transactions. Each Employee is provided with a copy of the Code and must annually certify that they have received it and have complied with its provisions. In addition, any Employee who becomes aware of any potential violation of the Code is obligated to report the potential violation to the Chief Compliance Officer.

55 Capital will provide a copy of its Code of Ethics to Clients and prospective clients upon request. Such a request may be made by submitting a written request to 55 Capital at the address on the cover page to this Brochure.

B. Recommendations Involving Material Financial Interests

55 Capital may recommend to Clients, or buy or sell for Client accounts, securities in which 55 Capital has a material financial interest, or may buy and sell for itself securities that 55 Capital also recommends to Clients. This presents a potential conflict of interest because it may create a financial incentive for 55 Capital to recommend certain investments to Clients. To mitigate this risk, 55 Capital requires that all employees sign and adhere to its Code, and provide periodic personal securities reporting.

C. Investing Personal Money in the Same Securities as Clients

From time to time 55 Capital, its Employees and/or the related persons may also personally buy or sell the same instruments that 55 Capital buys or sells for Clients, and it or they may own securities, or options on securities, of issuers whose securities are subsequently bought for Clients because of 55 Capital’s recommendations regarding a particular security. 55 Capital’s policy as to such transactions is that neither 55 Capital nor any of its Employees or related persons are to benefit from price movements that may be caused by transactions for Clients or otherwise. 55 Capital addresses this conflict by requiring Employees to sign and adhere to 55 Capital’s Code and to report personal securities holdings and transactions to 55 Capital.

D. Trading Securities At/Around the Same Time as Clients' Securities

As discussed above, from time to time, 55 Capital, its Employees, or related persons of 55 Capital may buy or sell securities for themselves that 55 Capital also recommends to the Client. 55 Capital will always document any transactions that could be construed as conflicts of interest and will always transact Client business before the business of its Employees and/or related persons when similar securities are being bought or sold.

It is the policy of 55 Capital that the firm will not affect any principal or agency cross securities transactions for client accounts. 55 Capital will also not cross trades between client accounts. Principal transactions are generally defined as transactions where an adviser, acting as principal for its own account or the account of an affiliated broker-dealer, buys from or sells any security to any advisory client. A principal transaction may also be deemed to have occurred if a security is crossed between an affiliated hedge fund and another client account. An agency cross transaction is defined as a transaction where a person acts as an investment adviser in relation to a transaction in which the investment adviser, or any person controlled by or under common control with the investment adviser, acts as broker for both the advisory client and for another person on the other side of the transaction. Agency cross transactions may arise where an adviser is dually registered as a broker-dealer or has an affiliated broker-dealer.

Item 12 – Brokerage Practices

A. Factors Used to Select or Recommending Broker-Dealers

55 Capital will generally have discretion as to the placement of brokerage (and accordingly, the commission rates paid). In selecting brokers to effect portfolio transactions, 55 Capital considers such factors as price, quality of execution, expertise in particular markets, the ability of the brokers to effect the transactions, the brokers' facilities, reliability, reputation, experience, financial responsibility in particular markets, familiarity both with investment practices generally and techniques employed by clients and clearing and settlement capabilities, subject at all times to principles of best execution, in accordance with the 55 Capital's policies and procedures. In selecting broker/dealers to execute transactions, 55 Capital need not solicit competitive bids and does not have an obligation to seek the lowest available commission cost. 55 Capital believes that the broker-dealers that it recommends provide competitive transaction and custody costs, helping Clients to eliminate or control costs and optimize the custodial structure to the benefit of account holders. When possible, 55 Capital seeks to pre-negotiate preferred terms for its Clients providing Clients with the benefits associated with the economy of scale and custodial knowledge of the Firm.

Certain brokers utilized by 55 Capital may provide general assistance to 55 Capital, including, but not limited to technical support, consulting services, and consulting services related to staffing needs. In selecting a broker, 55 Capital may consider the broker's general assistance and consulting services. To the extent 55 Capital would otherwise be obligated to pay for such assistance, it has a conflict of interest in considering those services when selecting a broker.

1. Research and Other Soft Dollar Benefits

55 Capital currently does not anticipate receiving research or other products or service other than execution from a broker-dealer or third-party in connection with Client securities transactions (“soft dollar benefits”). However, in the future, 55 Capital shall have the right if, in good faith, it considers it to be in the best interest of the Client and consistent with 55 Capital’s obligations to do so, to enter into “soft dollar” arrangements with one or more broker-dealers. All “soft dollar” arrangements will fall within the safe harbor provided by Section 28(e) of the Securities Exchange Act of 1934, as amended, as that safe harbor is currently interpreted by the SEC. If in the future 55 Capital obtains “soft-dollar” benefits, this Brochure will be appropriately amended.

2. Brokerage for Client Referrals

55 Capital does not consider, in selecting or recommending broker-dealers, client referrals from a broker-dealer. 55 Capital may receive referrals in the future and if it does it will appropriately amend this Brochure.

3. Directed Brokerage

55 Capital generally does not allow for direct brokerage. Securities transactions are executed by brokers selected by 55 Capital in its discretion and without the consent of the Clients. 55 Capital may enter into directed brokerage arrangements in its discretion.

B. Aggregating Trading for Multiple Client Accounts

55 Capital may place orders for the same security for different Clients at different times and in different relative amounts due to differences in investment objectives, cash availability, size of order and practicability of participating in “block” transactions. The level of participation by different Clients in the same security may also be dependent upon other factors relating to the suitability of the security for the particular Client.

When it does, 55 Capital will generally allocate the securities or proceeds arising out of those transactions (and the related transaction expenses) on an average price basis among the various participants. 55 Capital believes combining orders in this way will, over time, be advantageous to all participants. However, the average price could be less advantageous to a Client than if that Client had been the only account effecting the transaction or had completed its transaction before the other participants. Because of 55 Capital’s relationship to the Clients it manages by virtue of its position as an investment manager, there may be circumstances in which transactions for those entities may not, under certain laws, regulations and internal policies, be combined with those of some of 55 Capital’s and its affiliates’ other Clients, which may result in less advantageous execution for those Clients.

In addition, 55 Capital and/or its related persons or Clients may buy or sell specific securities for its or their own account that are not deemed appropriate for Client accounts at the time, based on personal investment considerations that differ from the considerations on which decisions as to investments in client accounts are made. Where execution opportunities for a particular security are limited, 55 Capital attempts in good faith to allocate such opportunities among Clients in a manner that, over time, is equitable to all clients.

Item 13 – Review of Accounts

A. Frequency and Nature of Periodic Review and Who Makes Those Reviews

55 Capital reviews Client accounts on a daily basis to ensure consistency with the Client's strategy and performance objectives. Asset allocation, cash management, market prospects and individual issue prospects are considered. The reviews are conducted by the Portfolio Management team.

B. Factors That Will Trigger a Non-Periodic Review of Client Accounts

Reviews may take place more frequently if triggered by economic, market, or political conditions.

C. Content and Frequency of Regular Reports

Clients will generally receive monthly reports and quarterly account statements. Reports will generally be provided in electronic format.

Item 14 – Client Referrals and Other Compensation

A. Economic Benefits Provided by Third Parties

55 Capital does not receive any economic benefit, directly or indirectly from any third party for advice rendered to the Client.

B. Compensation to Non-Advisory Personnel for Client Referrals

Currently, neither 55 Capital nor its related persons directly or indirectly compensates any person who is not advisory personnel for Client referrals. If in the future 55 Capital enters into such arrangements, this Brochure will be appropriately amended.

Item 15 – Custody

Clients should receive at least quarterly statements (paper or electronic) from the broker dealer, bank or other qualified custodian that holds and maintains client's investment assets. 55 Capital urges Clients to compare all account statements received by the qualified custodian with any statements received by 55 Capital. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Item 16 – Investment Discretion

The Advisory Agreement generally authorizes 55 Capital to retain discretionary authority to invest and trade the Clients' assets in a range of investments, subject to any specific limitations as to type, amount, concentration, or leverage, as determined by each Client and set forth in the applicable Advisory Agreement. Unless specified otherwise in the applicable Advisory Agreement, 55 Capital may enter into any type of investment transaction and employ any investment methodology or strategy it deems appropriate. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account. Any limitations on

this discretionary authority shall be included in this written authority statement. Clients may change/amend these limitations as required. Such amendments shall be submitted in writing.

Item 17 – Voting Client Securities

55 Capital reserves the right, but not the obligation, to exercise voting authority over proxies for Exchange Traded Funds, held in any Client's Account and shall exercise this authority at all times in a manner consistent with the best interests of the Client. 55 Capital does not exercise voting authority over proxies of the underlying companies within said Exchange Traded Funds held in any Client's Account. It is the responsibility of the ETF Sponsor to exercise voting authority over proxies of the underlying companies within said Exchange Traded Funds.

Where a proxy proposal raises a material conflict between 55 Capital's interests and the interests of the Clients, 55 Capital will seek to resolve the conflict in the best interest of the Clients.

Clients may obtain a copy of 55 Capital's complete proxy voting policies and procedures upon request. Clients may also obtain information from 55 Capital about how 55 Capital voted any proxies on behalf of their account(s) should 55 Capital participate in proxy voting in the future.

Item 18 – Financial Information

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about 55 Capital's financial condition. 55 Capital has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to Clients, and has not been the subject of a bankruptcy petition.