



March 5, 2020

## **FORM ADV Part 2A BROCHURE:**

**Altman Investment Management, LLC**

**33 Witherspoon Street, Princeton, NJ 08540**

[www.AltmanInvest.com](http://www.AltmanInvest.com) | 1-609-252-0048

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*This brochure provides information about the qualifications and business practices of Altman Investment Management, LLC. If you have any questions about the contents of this brochure, please contact us at (609)252-0048 or by email at: [paltman@altman-investment.com](mailto:paltman@altman-investment.com). 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 Altman Investment Management, LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Altman Investment Management's CRD number is: 113832*

*Altman Investment Management is a registered investment adviser. Registration does not imply a certain level of skill or training.*

## Item 2: MATERIAL CHANGES

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There are no material changes within our business to report.

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## Item 4: ADVISORY BUSINESS

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### A. Description of the Advisory Firm

Altman Investment Management LLC has been in business since August 2001, and the sole principal owner is Peter J. Altman.

### B. Types of Advisory Services

Altman Investment Management LLC (hereinafter “AIM”) offers the following services to advisory clients:

#### *Investment Supervisory Services*

AIM provides customized ongoing portfolio management services on the basis of the individual needs and objectives of each client. Investment programs are constructed within the context of each client’s:

total net worth or asset position, investment time horizon, liquidity needs, investment objectives, risk tolerance and specific requirements or limitations, such as tax status or income requirements.

Investment Supervisory Services include, but are not limited to, the following:

- Investment strategy
- Personal investment policy
- Asset allocation
- Asset selection
- Risk tolerance
- Regular portfolio monitoring

AIM prepares investment policy guidelines for each client based on the above considerations to fit the client’s needs.

AIM manages advisory accounts on both a discretionary and a non-discretionary basis. AIM’s fee schedule is set out in detail in Item 5 below.

#### *Investment Advice through Consultations*

AIM may also, on occasion deliver investment advice through consultations with clients, to whom AIM does not provide investment supervisory services.

#### *Services Limited to Specific Types of Investments*

AIM limits its investment supervisory services and/or investment advice mainly to the following types of investment products:

- Domestic and foreign equity securities, including exchange-listed securities, exchange-traded funds (ETFs) and securities traded over-the-counter
- United States government securities
- Corporate debt securities (other than commercial paper)
- Municipal securities
- Money market funds
- Real Estate Investment Trusts (REITs)

On occasion, AIM may also use other securities to help diversify a client's portfolio when applicable and in the best interests of the client.

### ***Investment Sub-Advisory Services***

AIM does not currently have any sub-advisory relationships.

### **C. Client Tailored Services and Client Imposed Restrictions**

AIM offers the same suite of services to all of its clients. However, specific client financial plans and their implementation are dependent upon the client's individual investment requirements which are governed by each client's current situation (income/return requirements, tax status, and risk tolerance levels). This is used to construct client-specific investment policy guidelines to aid in the selection of a portfolio structure that matches each individual client's restrictions, needs, and targets.

Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent AIM from properly servicing the client account, or if the restrictions would require AIM to deviate from its standard suite of services, AIM reserves the right to end the relationship.

### **D. Wrap Fee Programs**

AIM does not participate in any wrap fee programs.

### **E. Amounts Under Management**

AIM had the following assets under management at the following date:

<b>Discretionary Amounts</b>	<b>Non-Discretionary Amounts</b>	<b>Date Calculated</b>
\$98,124,291.00	\$1,901,303.00	12/31/19

## Item 5: FEES AND COMPENSATION

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### A. Fee Schedule

AIM's fee schedule (expressed as percentages per annum) is as follows. In addition, however, for certain clients previously managed by personnel of AIM while employed at other firms, AIM may offer, in its discretion, to continue such fee arrangements or negotiate a new fee arrangement.

#### *Investment Supervisory Services Fees*

AIM changed its investment supervisory services fees for new clients after March 31, 2011. The fees for existing and new clients are set out below.

##### Equity and Balanced Fee Schedule

Total Assets Under Management	Annual Fee
First \$1,000,000	1.25%
Next \$2,000,000	.95%
Next \$7,000,000	.75%
Next \$40,000,000	.55%
Value in excess of \$50,000,000	Negotiable

Minimum Discretionary Fee: \$7,500

Minimum Non-Discretionary Fee: \$8,500

These fees are negotiable and the final fee schedule is attached as Appendix A of each Investment Management Agreement between the client and AIM.

In addition, for certain clients previously managed by personnel of AIM while employed at other firms, AIM may offer, in its discretion, to continue such fee arrangements or negotiate a new fee arrangement.

##### Fixed Fee Schedule

*New clients (from March 31, 2011)*

Total Assets Under Management	Annual Fee
First \$1,000,000	0.50%
Next \$2,000,000	.20%
Next \$7,000,000	.15%
Value in excess of \$50,000,000	Negotiable

Minimum Discretionary Fee: \$20,000

These fees are negotiable and the final fee schedule is attached as Appendix A of each Investment Management Agreement between the client and AIM.

In addition, for certain clients previously managed by personnel of AIM while employed at other firms, AIM may offer, in its discretion, to continue such fee arrangements or negotiate a new fee arrangement.

In each case, there is a surcharge of 1/10 (one-tenth) of 1% (one percent) of the market value of the Portfolio for non-discretionary accounts. Fees are assessed on all assets under management at the market value on the appraisal date.

### Money Market Fund Fees

On occasion, cash balances in AIM client advisory accounts (other than liquidity accounts) will be invested by AIM in shares of money market funds when considered by AIM to be the best use of such balances. Clients should note that when their account balances are invested in shares of money market funds, where management fees are assessed as an expense, that they are, in effect, paying two advisory fees on assets invested in such money market funds, because in addition to AIM's fees (as described above), the client also effectively pays the advisory fee of the investment advisor to the money market fund, as well as other money market fund expenses.

### ***Investment Advice through Consultations***

On occasion AIM may also provide investment advice to clients on a consultation basis, in situations where the client does not require investment supervisory services to be provided by AIM. Fees for any such advisory consulting services will be determined on a case by case basis after discussion with the client, depending on the type and scope of the advice delivered and the time AIM is required to spend.

## **B. Payment of Fees**

### ***Payment of Investment Supervisory Fees***

Fees are calculated quarterly based on AIM's market appraisal of the value of the portfolio and one-quarter of the annual fee will be invoiced to the client in the quarterly review. The remaining annual fee will be invoiced quarterly in arrears. Clients can elect to have fees deducted by AIM from their accounts, following invoice calculations.

### ***Payment of Advisory Consulting Fees***

Fees will be calculated based on the advice to be provided and notified to the client in advance. All advisory consulting fees will be invoiced to the client in arrears.



### **C. Clients Are Responsible for Third Party Fees**

Clients receiving investment supervisory services from AIM will also incur brokerage commissions and other transaction costs during the course of their relationship with AIM. Such third-party fees and commissions are separate from and in addition to the fees and expenses charged to the client by AIM.

Clients are responsible for the payment of all third-party fees (including but not limited to custodian fees, mutual fund expenses, brokerage commissions and transaction fees). Clients will be separately invoiced for custodian and brokerage commissions directly by the relevant third-party custodian and broker respectively. Please also see Item 12 of this brochure for important information regarding brokers and custodians.

### **D. Prepayment of Fees**

One-quarter of AIM's annual fee will be invoiced in advance. The remaining annual fee will be invoiced quarterly in arrears. AIM does not deduct fees directly from clients' accounts.

Clients may terminate the relationship with AIM without penalty at any time by sending written notice of termination of the Investment Management Agreement to AIM. AIM may terminate the relationship with the client in the same way.

In the event that the Investment Management Agreement between the client and AIM is terminated then any fees paid by the client for the period between the date of termination and the next appraisal date will be refunded to the client on a pro rata basis by AIM.

### **E. Outside Compensation for the Sale of Securities to Clients**

Neither AIM nor its supervised persons or employees accept any compensation for the sale of securities or other investment products, including brokerage commissions, asset-based sales charges or services fees from the sale of mutual funds.

## Item 6: PERFORMANCE-BASED FEES & SIDE-BY-SIDE MANAGEMENT

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AIM does not currently have any performance-based fee relationships.

## Item 7: TYPES OF CLIENTS

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AIM generally provides investment supervisory services and/or investment advisory services to the following types of clients:

- High-Net-Worth Individuals
- Pension and profit sharing plans
- Trusts, estates or charitable organizations
- Corporations or business entities other than those listed above.

### ***Minimum Account Size***

#### *Equity and Balanced Accounts*

AIM requires a minimum client account size for a discretionary portfolio of \$1,000,000 and a minimum account size for a non-discretionary portfolio of \$1,000,000. Each of these minimum size requirements may however be waived by AIM, based on the needs of the client and the complexity of the client's investment policy guidelines.

#### *Fixed Accounts*

AIM requires a minimum client account size for a discretionary portfolio of \$5,000,000. The minimum size requirement may however be waived by AIM, based on the needs of the client and the complexity of the client's investment policy guidelines.

## Item 8: METHODS OF ANALYSIS, INVESTMENT STRATEGIES, & RISK OF LOSS

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### A. Methods of Analysis and Investment Strategies

AIM's methods of analysis include fundamental analysis, technical analysis, charting and cyclical analysis.

**Fundamental analysis** involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages along with the current and historical valuation of the company and its industry.

**Technical analysis (including charting)** involves the analysis of past market data; primarily price and volume.

**Macro-economic analysis** involves the analysis of the behavior of the aggregate economy, including examining economy-wide phenomena such as changes in unemployment, national income, rate of growth, gross domestic product, inflation and price levels.

AIM utilizes various sources of information to conduct its analysis and develop its investment strategies, including inspections of corporate activities, research materials prepared by other institutions, corporate rating services, annual reports, securities prospectuses, public filings with the Securities and Exchange Commission, company press releases and data retrieval services.

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

### B. Material Risks Involved

AIM uses Long Term Trading and Short-Term Trading strategies.

AIM utilizes investment strategies that are designed to capture market rates of both return and risk. Frequent securities trading, when done, can affect investment performance of a client portfolio, particularly through the increased brokerage and other transaction costs and taxes associated with such increased trading frequency.

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

### C. Risks of Specific Securities Utilized

AIM generally seeks investment strategies that do not involve significant or unusual risk beyond that of the general domestic and/or international equity and fixed income markets.

**Past performance is not a guarantee of future returns. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

## **Item 9: DISCIPLINARY INFORMATION**

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There are no legal or disciplinary events that are material to a client's or a prospective client's evaluation of AIM or the integrity of our supervised personnel or employees.

## **Item 10: OTHER FINANCIAL INDUSTRY ACTIVITIES & AFFILIATIONS**

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### **A. Registration as a Broker/Dealer or Broker/Dealer Representative**

Neither AIM nor its management personnel or representatives are registered as a broker-dealer or as a registered representative of a broker-dealer, or have any application pending to register as a broker-dealer or registered representative of a broker-dealer.

### **B. Registration as a Futures Commission Merchant (FCM), Commodity Pool Operator (CPO), or a Commodity Trading Advisor (CTA)**

Neither AIM nor its management personnel or representatives are registered as a FCM, CPO, or CTA or have any application pending to register as a FCM, CPO or CTA or as a registered representative of a FCM, CPO or CTA.

### **C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests**

AIM does not select or recommend other advisers for clients or have a business relationship or compensation arrangement with any other adviser that could create a conflict of interest between AIM and AIM's clients.

### **D. Selection of Other Advisors or Managers and How This Adviser is Compensated for Those Selections**

AIM does not utilize or select other advisors or third-party managers. All client assets are managed by AIM management.

## **Item 11: CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT**

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### **TRANSACTIONS & PERSONAL TRADING**

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#### **A. Code of Ethics**

AIM's Code of Ethics requires that all members, officers and employees of AIM behave with the highest standard of conduct with regard to securities transactions that might result in a conflict of interest between AIM and a client of AIM and requires that AIM abides by the provisions of the Investment Advisers Act of 1940 (the "Advisers Act") as well as the AIMR Code of Ethics and Standards of Professional Conduct and other applicable laws and regulations.

AIM has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Procedures and Reporting, Reporting Violations. Clients may request a copy of the AIM Code of Ethics from AIM management at any time.

AIM also has in place a written statement of policy and procedures required by Section 204A of the Advisers Act in order to prevent the misuse of material non-public information. Clients may request a copy from AIM management at any time.

#### **B. Recommendations Involving Material Financial Interests**

AIM does not recommend that clients buy or sell any security in which a person related to AIM has a material financial interest.

#### **C. Investing Personal Money in the Same Securities as Clients**

From time to time, representatives of AIM may buy or sell securities for themselves that they also recommend to clients. Executing a personal transaction prior to a client transaction may give rise to a conflict of interest and may constitute "front-running" the client transaction to the benefit of AIM and to the detriment of the client. To address this potential conflict of interest AIM will always document any personal transactions that could potentially give rise to a potential conflict of interest and will always execute client transactions before any personal transactions when the same or similar securities (or related securities such as derivatives of the security) are being bought or sold in accordance with AIM's Code of Ethics, in accordance with the procedures summarized in Section D below.

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

From time to time, representatives of AIM may buy or sell securities for themselves around the same time as client transactions in the same security (or related securities such as derivatives of the security). Once a security is recommended for purchase or sale for a client account that security (and any derivative of that security) will be restricted for trade by all AIM employees until the

buy/sell program has been completed for all AIM clients. A seven-day blackout period between the completion of the trading program for AIM clients and the beginning of the employee trading program will be in effect. All employee trades must also be approved prior to execution by Peter J. Altman, President of AIM. Employees and brokerage accounts related to employees are prohibited from profiting on the purchase and sale or sale and purchase of the same security, options or other products related to the security within 60 calendar days of the date of the initial trade (“short-term trades”). Further information is contained in the AIM Code of Ethics, a copy of which is available to clients on request at any time.

## **Item 12: BROKERAGE PRACTICES**

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### **A. Factors Used to Select Custodians and/or Broker/Dealers**

AIM will not have authority to select the custodian to maintain custody of client’s assets. Each client will select their own custodian. Although AIM may recommend a custodian, it is the client’s final decision to custody their assets with a particular custodian selected by the client.

In general, AIM will have authority to select brokers and establish brokerage accounts to execute transactions for discretionary client accounts. This authority can be limited by the client’s instructions to purchase or sell securities through a brokerage firm of the client’s choice. In purchasing and selling securities for discretionary client accounts AIM will seek to obtain execution at the most favorable net prices (on an overall basis) through responsible brokers and dealers, in each case registered with FINRA. In selecting brokers and dealers to execute transactions and in evaluating the reasonableness of the brokerage commissions paid to them, consideration will be given to such factors as the price of the security, the size and difficulty of the order, the reliability, integrity, financial condition and general execution and operational capabilities of the competitive brokers and dealers and their expertise in particular markets and research services provided by them. AIM’s objective in selecting brokers will be to obtain, in general, the best net price for transactions on an overall basis and not necessarily the lowest available brokerage commission. Subject to the foregoing, a significant amount of brokerage allocations may be made on the basis of “soft-dollar” arrangements with various brokers and dealers, which are described in more detail in the following section.

#### ***1. Research and Other Soft-Dollar Benefits***

Various brokers and dealers provide AIM with access to their institutional trading services, which are typically not available to retail investors. These services generally are available to independent investment advisors on an unsolicited basis, at no charge to them. These services are not however contingent upon AIM committing to pay any specific amount of brokerage commissions. Such brokerage services include the execution of securities transactions, research, and access to investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

In selecting brokers and dealers AIM may consider products and services provided to AIM, or expenses paid, by such brokers and dealers. Such “Soft dollar” payments or rebates of amounts

paid to brokers and dealers may arise from over-the-counter securities transactions as well as exchange-traded securities transactions. When AIM uses client brokerage commissions (or mark-ups or markdowns) to obtain research or other products or services, it receives a benefit by not having to produce or pay for such research or products or services. As a result, AIM may therefore have an incentive to select or recommend a broker or dealer based on its interest in receiving the research or other products or services, rather than on its clients' interest in receiving most favorable execution. The following paragraph describes how AIM addresses this potential conflict of interest.

In accordance with Section 28(e) of the Securities and Exchange Act of 1934, AIM may pay a broker or dealer a commission in excess of that which another broker or dealer might have charged for effecting the same transaction in recognition of the value of brokerage or research services provided to AIM by the broker or dealer (including research provided by third parties), provided that AIM determines that such commission charges are reasonable in relation to the value of such services. AIM will regularly evaluate the reasonableness of such commissions in light of what competing brokers and dealers are willing to charge for similar brokerage and research services. AIM will seek to obtain commission rates that are competitive with those paid by similar institutions for comparable transactions.

AIM primarily receives "Soft Dollar" benefits described above in the form of Research services related to portfolio management that are published by the relevant broker or dealer for institutional clients only. Such Research services published by a broker or dealer through which AIM executes securities transactions for all of its clients may be used for the benefit of all other AIM client accounts. Conversely Research services received from brokers or dealers which execute transactions for a particular client account will not necessarily be used by AIM only in connection with management of that account but may be used to benefit all AIM's clients equally.

## ***2. Brokerage for Client Referrals***

AIM does not receive referrals from any broker or dealer or other third party in exchange for using the services of that broker or dealer or third party.

## ***3. Clients Directing Which Broker/Dealer/Custodian to Use***

Certain clients may direct AIM to use designated brokers or dealers for executing security transactions instead of the broker or dealer recommended by AIM. Clients are encouraged to make such directions subject to principles of best execution. Clients are further advised that such directed brokerage arrangements may not necessarily result in best execution of trades, and, if AIM is not free to negotiate brokerage commissions, this may result in higher brokerage commission costs to the client. One of the main reasons for this is that commissions charged by such broker or dealer would be based on the commission agreement directly between the client and the broker or dealer and would therefore not be subject to any volume discounts or other benefits negotiated by AIM. Moreover, if a request for directed brokerage is made with respect to an account that is subject to ERISA, ERISA requirements must be met in order for the application to accept such a direction; including a representation that such directed arrangement is in the sole interest and benefit of the ERISA plan itself.

Clients will designate a custodian to maintain custody such client's assets. If however, a client selects a custodian other than a custodian proposed by AIM, this may mean that the client could pay higher custodian fees and the client may not obtain optimal custodian services.

### **B. Aggregating (Block) Trading for Multiple Client Accounts**

AIM may aggregate purchase or sale orders for clients, as AIM may be able to obtain lower brokerage commission costs on a per-share and per-dollar basis, because larger orders tend to have lower transaction execution costs. In general AIM will allocate securities under aggregate orders on a pro-rata basis at the average execution price, unless AIM determines that a different method of allocation, whether by reason of average pricing considerations, similar securities in the same accounts, available capital or other factors, suggest a more equitable method of allocation.

## **Item 13: REVIEWS OF ACCOUNTS**

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### **A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews**

All client accounts are reviewed quarterly by Peter J. Altman in his capacity as Chief Investment Officer. Peter will review each client's account with regards to the client's investment policy guidelines and risk tolerance levels. All client accounts at AIM are assigned to Peter J. Altman as reviewer.

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

Reviews may also be triggered by material market, economic or political events, or by agreed changes in a client's investment policy guidelines or financial situation (such as changes in risk tolerance, income or return requirements, retirement, termination of employment, physical move, or inheritance).

### **C. Content and Frequency of Regular Reports Provided to Clients**

AIM generally provides clients with written reports containing the status of their portfolio on a quarterly basis. Such reports generally include, among other things, information on performance and estimated account values.

## **Item 14: CLIENT REFERRALS & OTHER COMPENSATION**

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### **A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)**

AIM does not receive any economic benefit, directly or indirectly from any third party for advice rendered to AIM clients.



## **B. Compensation to Non –Advisory Personnel for Client Referrals**

AIM does not directly or indirectly compensate any non-advisory personnel for client referrals.

### **Item 15: CUSTODY**

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AIM does not take direct custody of client assets at any time. Client assets are always held in custody solely with the relevant custodian for such client account. Clients will receive monthly account statements directly from their custodian and AIM recommends that clients carefully review those statements. AIM does not forward separate monthly account statements to clients. Clients are encouraged to carefully review account statements from their custodian for any discrepancies.

### **Item 16: INVESTMENT DISCRETION**

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For those client accounts where AIM accepts discretionary authority and provides ongoing supervision of assets on behalf of the client, AIM maintains limited power of authority over such client accounts with respect to the type of securities to be bought and sold, the amount of securities to be bought and sold and the timing of such purchases and sales. The scope of AIM's authority and procedures for purchasing and selling securities is explained to clients in detail by AIM before an advisory relationship is commenced and is set out in full in the Investment Management Agreement between AIM and the client.

### **Item 17: VOTING CLIENT SECURITIES (PROXY VOTING)**

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AIM does not request or accept voting authority for client securities. Clients will either receive proxy solicitations directly from the issuer of the security or from the client's custodian. If AIM does receive any proxy solicitation from an issuer or a client's custodian, AIM will send such proxy solicitation to the client, unless AIM is instructed otherwise by the client. Clients are therefore advised to direct all questions regarding proxy solicitations or proxy voting to the issuer of the security.

## Item 18: FINANCIAL INFORMATION

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### **A. Balance Sheet**

AIM does not require or solicit prepayment of more than \$1,200 in fees per client six months or more in advance and therefore no balance sheet is attached to this brochure.

### **B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients**

Neither AIM nor its management have any financial conditions that are likely to reasonably impair our ability to meet contractual commitments to clients.

### **C. Bankruptcy Petitions in Previous Ten Years**

Neither AIM nor its management have been the subject of a bankruptcy petition in the last ten years.

## Item 19: REQUIREMENTS FOR STATE REGISTERED ADVISERS

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AIM is not a state registered advisor and has therefore not completed this section of the brochure.