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**FORM ADV PART 2 BROCHURE**

This brochure provides information about the qualifications and business practices of Wright Fund Management, LLC. If you have any questions about the contents of this brochure, please contact us at 310/452-1887 or [www.sierrainvestment.com](http://www.sierrainvestment.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.

Wright Fund Management, LLC is a Registered Investment Advisor. Registration with the United States Securities and Exchange Commission does not imply a certain level of skill or training.

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## ADVISORY BUSINESS

Wright Fund Management, LLC (WFM), was established on October 17, 2007, and serves as the investment adviser to the Sierra Tactical All Asset (All Asset Fund), the Sierra Tactical Core Income (Income Fund), the Sierra Tactical Municipal (Muni Fund) and the Sierra Tactical Bond Funds. The funds are each registered as a series trust of Northern Lights Fund Trust, an investment company registered under the Investment Company Act of 1940.

### Principals

David C. Wright, JD, is the Managing Member and Kenneth L. Sleeper, MBA, PhD is co-Portfolio Manager, participating in portfolio management analysis and decisions. Mr. Wright and Dr. Sleeper each own a 50% financial interest in WFM.

### Advisory Service

WFM seeks to achieve each fund's objectives by investing in a diversified portfolio of unaffiliated mutual funds and ETFs (collectively, "funds") selected by the Portfolio Managers, Mr. Wright, Dr. Sleeper and Ms. Terri Spath, CIO. They purchase shares of funds from a very wide variety of asset classes, including, but not limited to, domestic and foreign stock, bond and commodity funds, as well as currency and real estate funds, and funds which are internally diversified.

Through the use of proprietary risk-management strategies, WFM tracks daily every fund held in each Sierra mutual fund. When a given holding declines enough to give a Sell signal under our proprietary disciplines, we move all or a portion of that holding into a money market or similar "safe-haven" fund. When our system gives a Buy signal, we move assets into that fund unless we have made other choices in the interim.

### Statement of Investment Objectives and Goals

The Sierra Mutual Funds' investment objectives are to provide long-term total return and to limit volatility and downside risk.

The investment goals for the **Sierra Tactical All Asset Fund** are:

To provide long-term total return, the combination of yield and net price gains from the underlying funds, and to limit volatility and downside risk. The Fund's multi-asset diversification strategy employs unusually broad diversification across asset classes, markets, industries and issuers. A passive "buy and hold" strategy is not employed.

As part of an integrated risk-management discipline, the Fund monitors underlying holdings daily and applies a trailing stop discipline to each holding, based on a proprietary approach, to limit the impact of any sustained decline in a given asset class or holding. The overall asset allocation of the Fund is not fixed. It can and does change significantly over time, re-allocating the portfolio in response to trend changes in the U.S. and global economy and in various investment markets.

The investment goals for the **Sierra Tactical Core Income Fund** are:

To achieve satisfactory Total Return – income plus capital appreciation – over each market cycle, while limiting drawdowns, an approach that has in recent years been called absolute return. It is a globally diversified strategy, with asset allocation tactically adjusted to reflect changes in the economic and market cycles.

The Fund invests in a diverse selection of mutual funds to access a wide range of income-oriented asset classes. A stop is placed under each holding that rises as its price rises, and the holding is sold when price declines below the stop to limit drawdowns even during periods of severe market declines. There are no set proportions or limits for the Fund's allocations.

The investment goals for the **Sierra Tactical Municipal Fund** are:

To produce satisfying long-term returns while limiting downside risk. Returns are created from interest income as well as increases in the bond fund prices. The interest income from municipal bonds is tax-exempt at the federal (and sometimes state) level.

The Fund diversifies among at least four (often up to ten) municipal bond mutual funds, including national and state-specific. Each holding is monitored daily and during declines, a proprietary stop-loss discipline is implemented with the goal of limiting drawdowns. The Fund will be fully invested when there are buy signals, and will at times, be fully in cash when the universe of municipal bond mutual funds are showing sell signals.

The investment goals for the **Sierra Tactical Bond Fund** are:

To produce satisfying long-term returns while limiting downside risk. It uses a tactical approach to move between three uncorrelated asset classes: High Yield Corporate Bonds (HYCB), U.S. Treasuries, or Cash.

Tactical Bond Program accounts are diversified among typically eight or more HYCB mutual funds. When each underlying HYCB mutual fund hits its proprietary sell level, we will move the relevant assets temporarily into a long-term Treasury bond fund (provided the Treasury fund is in an uptrend) until the next set of Buy signals in the HYCB funds. If the Treasury fund is not in an uptrend, we will instead move temporarily into a money-market fund until either the HYCB funds or Treasury fund gives a new buy signal.

#### Assets Under Management

As of December 31, 2019, the assets under management in the Sierra Tactical All Asset Fund were \$570,948,980, in the Sierra Tactical Core Income Fund, \$1,362,790,964, in the Sierra Tactical Municipal Fund, \$143,911,966 and in the Sierra Tactical Bond Fund, \$271,174,130.

#### Total Assets Under Management or Advisement

As of December 31, 2019, the total assets under management or advisement, including our affiliates, was over \$4.5 billion.

### FEES AND COMPENSATION

Wright Fund Management, LLC, manages the Sierra Tactical All Asset Fund for an annual management fee of 1.25%, the Sierra Tactical Core Income Fund for an annual management fee of 0.75%, the Sierra Tactical Municipal Fund for an annual management fee of 0.75%, accruing daily and payable in arrears, and the Sierra Tactical Bond Fund for an annual management fee of 1.05%. Our management contract and fees are reviewed annually by a Board of independent Trustees.

### PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

Wright Fund Management, LLC does not receive performance-based fees.

## TYPES OF CLIENTS

WFM serves as the investment manager to the Sierra Tactical All Asset Fund, the Sierra Tactical Core Income Fund, the Sierra Tactical Municipal Fund and the Sierra Tactical Bond Fund.

## METHODS OF ANALYSIS, INVESTMENTS AND RISK OF LOSS

### Methods of Analysis

WFM uses proprietary, analytic approaches that include analysis of economic, fundamental, charting, cyclical and other technical data. We use websites, newsletters, financial newspapers, computer databases and government publications among other sources, to obtain information in order to analyze a wide variety of asset classes, mutual funds and ETFs.

We use several software programs to track and rank asset classes and funds with a view to creating portfolios that are likely to be productive, yet which have overall low volatility due to moderate internal correlations. We also consider fundamentals in order to invest in asset classes that appear to have upside potential that does not appear to already be fully exploited.

### Investment Strategy

WFM employs a multi-asset diversification strategy in order to limit downside risk as well as to seek opportunities to enhance absolute return. All fund portfolios are comprised of various security and investment categories utilizing carefully selected mutual funds, ETFs and closed-end investment companies which are then monitored daily. From time to time, WFM may sell a fund in order to purchase a new fund in the same asset class or to revise the asset allocation mix among asset classes.

We are active managers; we do not employ a passive, “buy and hold” strategy. When our risk-management strategy gives a “Sell” signal, we will move all or part of the position into a money-market or similar “safe-haven” fund. When our strategy gives a “Buy” signal, we move assets back into the same fund unless, in the interim, the Advisor has

identified a more attractive fund. Our strategy is not designed to buy at the bottom or to sell at the top of the market; rather, we endeavor to participate in a substantial part of any sustained up-trend as well to step aside during most of a sustained downtrend.

Since the investment markets rise and fall in irregular patterns, most holding periods are less than one year and, on some occasions, may turn out to be as brief as 20 days or less.

Our management approach typically results in being in and out of a particular fund twice each year, on average. As a result, taxable accounts may incur significant short-term capital gains and losses.

### Risk of Loss

Performance of the funds during future periods will definitely vary. Some months and some quarters will result in negative performance; indeed, some future years may have negative performance. Using our proprietary risk-limiting disciplines, the private managed accounts of our affiliated companies (most of which have been managed by Mr. Wright and Dr. Sleeper using the same strategy as in the Sierra Tactical All Asset Fund) have weathered significant market declines very well. However, past performance is no guarantee of future results.

## DISCIPLINARY INFORMATION

Since inception of WFM and its affiliates, there have been no legal or disciplinary events to report that are material to a client or prospect's evaluation of our firm's advisory business or our management integrity.

## OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

Wright Fund Management, LLC (WFM), has two affiliates which are also Registered Investment Advisors: Sierra Investment Management, Inc. (Sierra) and Ocean Park Asset Management, Inc. (Ocean Park). David C. Wright, JD, and Kenneth L. Sleeper, MBA, PhD, are the beneficial owners, officers and Managing Directors of Sierra and Ocean Park.

For a quarterly management fee, Sierra manages private investment accounts for direct clients. Ocean Park manages investment accounts for clients of unaffiliated Financial Advisors and shares the fees with those advisors or their firms. In addition, Ocean Park provides sub-advisory investment management services to other investment management firms under contractual agreements.

A percentage of most Sierra (and some Ocean Park) client accounts is invested in the Sierra Tactical All Asset, the Tactical Core Income, the Tactical Municipal and/or the Tactical Bond Funds. To the extent that these client accounts hold positions in the All Asset, Income and Tactical Bond Funds, the Sierra or Ocean Park quarterly investment management fee is reduced by an amount equal to the management fees which are paid to Wright Fund Management, LLC within the funds for that fraction of the Sierra or Ocean Park account. To the extent that these client accounts hold positions in the Tactical Municipal Fund, the Sierra or Ocean Park quarterly investment management fee is reduced by an amount equal to the net expense ratio, a portion of which is paid to Wright Fund Management, LLC for that fraction of the Sierra or Ocean Park account.

WFM reimburses Sierra for certain administrative fees and business expenses.

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

### Code of Ethics

Our Code of Ethics has been adopted pursuant to the requirements of rule 204A-1 under the Investment Advisors Act of 1940. A complete copy of our Code of Ethics is available upon request to any client or prospective client.

Our philosophy states that the client's interest is always foremost; we will always strive to do what is right for the client.



### Participation in Client Transactions

WFM and its personnel, may, on occasion, buy and sell for their own accounts some of the same mutual funds utilized in affiliates' managed accounts, and mutual funds or ETF's used in the Sierra All Asset, Income, Muni and/or Tactical Bond Funds. There is no possible conflict with client transactions as pertains to mutual funds since they are priced daily after the markets close. As to ETF transactions, trading shortly ahead of clients (front-running) is prohibited. Any such person shall be "last in" and "last out" for the trading day when their trading occurs in close proximity to client trades. In addition, compliance policies are in effect so that no such transactions will affect prices to the managed accounts or either Sierra mutual fund.

Moreover, although the SEC will not permit any of the Sierra Mutual funds to waive its internal expenses for Sierra and Ocean Park clients whose managed accounts hold fund shares, those clients will have their Sierra and Ocean Park quarterly investment management fees reduced by the management fees within the Sierra Tactical All Asset, Tactical Income and Tactical Bond Funds paid to Wright Fund Management, LLC for that fraction of their Sierra and Ocean Park accounts and by the net expense ratio within the Sierra Tactical Municipal Fund, a portion of which is paid to Wright Fund Management, LLC, for that fraction of their Sierra and Ocean Park accounts.

All access persons (David C. Wright, Kenneth L. Sleeper, Joy Bunzel, Yanni Dalkos, Gira Patel, Marshall Quan and Terri Spath) are required to disclose all relevant personal securities holdings upon commencement of employment and annually thereafter. In addition, quarterly reports of personal securities transactions must be submitted whether or not any transactions have occurred. These reports are reviewed to identify potential conflicts of interest; if a conflict is identified, steps will be taken to address such a conflict.

Our fiduciary responsibility to our clients is primary and governs our corporate and investment management decisions.

## BROKERAGE PRACTICES

Neither WFM nor our affiliates select or recommend broker-dealers for commission-based client transactions.

Neither WFM nor our affiliates receive research or other products or services in connection with client securities transactions (“soft dollar” benefits).

Neither WFM nor our affiliates have any economic relationship with a broker-dealer that creates any type of material conflict of interest.

## REVIEW OF ACCOUNTS

Mr. Wright, Dr. Sleeper and Ms. Spath review the Sierra Tactical All Asset Fund, the Sierra Tactical Core Income Fund, the Sierra Tactical Municipal Bond Fund and the Sierra Tactical Bond portfolios on a daily basis. Annual and semi-annual reports on the Funds are mailed to shareholders and posted on the Sierra mutual funds website, [www.sierramutualfunds.com](http://www.sierramutualfunds.com).

## CLIENT REFERRALS AND OTHER COMPENSATION

WFM receives no economic benefit from any firm or individual (other than our direct clients, the Sierra Tactical All Asset Fund, the Sierra Tactical Core Income Fund, the Sierra Tactical Municipal Bond Fund and the Sierra Tactical Bond Fund) for providing investment management services.

## CUSTODY

WFM never takes custody or direct control of client securities, which remain with the custodians.

### INVESTMENT DISCRETION

WFM has investment discretion regarding which securities to buy or sell, the amount of securities to be bought and sold and the timing of each purchase or sale.

### VOTING CLIENT SECURITIES

WFM will vote proxies according to our Proxy Voting Policy. Shareholders may request statements of how WFM voted all proxies which were received and/or a copy of the Proxy Voting Policies and Procedures from Wright Fund Management, LLC (contact information on the cover page).

### FINANCIAL INFORMATION

WFM does not require or accept prepayment of more than \$1,200 in fees per client, six months or more in advance.