

AMERICAN ALPHA ADVISORS, LLC
D/B/A DOMANI ADVISORS

FORM ADV PART 2A – FIRM BROCHURE

ITEM 1 COVER PAGE

March 30, 2020

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FIRM CRD #291796

This brochure provides information about the qualifications and business practices of American Alpha Advisors, LLC. If you have any questions about the contents of this brochure, please contact Sam Haddad at (917) 810-5530 or by email at domani@domaniadvisors.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 American Alpha Advisors, LLC is also available on the SEC's website at www.adviserinfo.sec.gov. You may search this site using a unique identifying number, known as a CRD number. American Alpha Advisors, LLC CRD # is 291796.

The use of the term "registered investment advisor," "registered," or "registration" does not imply a certain level of skill or training. Registration with the SEC as an investment adviser does not imply that American Alpha Advisors, LLC or any Principals or Employees of American Alpha Advisors, LLC possess a particular level of skill or training in the investment advisory business or any other business

ITEM 2. MATERIAL CHANGES

As a registered investment adviser, AAA must ensure that the ADV Part 2 is current and accurate and makes full disclosure of all material facts relating to the advisory relationship. AAA will ensure that you receive a summary of any material changes and subsequent Brochures within 120 days of the close of our business fiscal year. Furthermore, AAA will provide you with other interim disclosures about material changes as necessary. This Item discusses only the material changes that have occurred since Advisor's last annual update dated December 2019.

- Item 4 – Advisory Business
- Item 5 – Fees and Compensation
- Item 8 – Methods of Analysis, Investment Strategies & Risk of Loss
- Item 12 – Brokerage Practices
- Item 14 – Client Referrals and Other Compensation

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ITEM 4. ADVISORY BUSINESS

A. Description of Advisory Firm

American Alpha Advisors, LLC d/b/a Domani Advisors (hereinafter, "AAA") is a Limited Liability Company organized in the State of New York in October 2014 and in business as a registered investment adviser since 2017. As of August 2018, the principal owner of AAA is Sam Haddad.

AAA provides Clients with Investment Management and Reporting of investments across different asset classes.

B. Description of Advisory Services

AAA primarily offers ongoing Investment Management and Reporting Services to Clients. AAA provides advisory services to Clients through individuals registered as investment adviser representatives ("IARs").

AAA offers advisory services based on the individual goals, objectives, time horizon, and risk tolerance of each Client. AAA creates an Investment Policy Statement for each Client, which outlines the Client's current situation (income, tax levels, and risk tolerance levels). Portfolio management services include, but are not limited to, the following:

- Determine investment strategy
- Asset allocation
- Assessment of risk tolerance
- Personal investment policy
- Security selection
- Ongoing portfolio monitoring

AAA evaluates the current investments of each Client with respect to their risk tolerance levels and time horizon. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each Client.

AAA maintains an agreement with TD Ameritrade Institutional to custody advisory assets. AAA will request discretionary authority from Clients in order to select securities and execute transactions in Client accounts.

AAA provides advisory services in accordance with its fiduciary duty and without consideration of AAA's own economic interest or financial benefit. AAA's services are designed to assist Clients in meeting their financial goals and objectives using various investments. AAA will conduct periodic meetings with Clients to review portfolio, risk tolerance, financial situation and goals. If a Client undergoes a significant change to his/her financial situation or goals, the Client should notify AAA so that we can consider this information in managing the Client's investments.

Investment Management

AAA provides advisory Clients with Investment Management services. AAA utilizes several different investment strategies and will allocate Client assets to one or more strategies on a discretionary basis in a particular proportion. AAA will allocate so that the overall risk/return profile of the Client's assets across all strategies is suitable to the Client. AAA's managed portfolios primarily consist of mutual funds, typically institutional share class with the lowest expense ratio available. AAA may use other instruments, such as, ETFs, REITs, bonds, individual stocks, or options to help diversify or hedge a portfolio.

In addition to core strategies, AAA offers several other strategies that are based on research and/or signals provided by third-party managers. These strategies may utilize market timing and/or leveraged products. Due to the unique nature of these strategies, AAA will only allocate Client assets with prior oral or written approval. Client will be made aware that these strategies, which require opt-in, have a higher fee ("Strategy Fee"). The Strategy Fee will be disclosed to the Client, either orally or in writing.

A Client may elect to hire AAA solely for Investment Management in a particular strategy, in which case he/she will forego the typical advisory services and AAA will not monitor the Client's overall financial situation.

Reporting Services

Clients may elect to hire AAA to monitor, oversee and report on external managers and investments for a mutually agreed upon fee to be invoiced to the Client. Managers can include third-party advisers, hedge fund managers, private equity managers or any other managing-member of a passive investment. Investments can include passive real estate holdings, hedge fund, private equity or any other passive investment syndication. AAA does not accept compensation from managers of external investments to which we provide Reporting Services. The Reporting Service consists of tracking performance while also documenting contributions, distributions, and income of an external investment. AAA will communicate directly with managers to facilitate the cash management process, receive investment updates and assist with paperwork. Such external investments will be included on the Client's consolidated net worth report and provided to Clients on a periodic basis either in person, by mail or electronically.

C. Tailoring of Advisory Services and Client Imposed Restrictions

Regardless of the services provided, AAA will tailor the services to the individual needs of the Client. AAA will conduct an assessment to understand the risk tolerance, goals, time horizon and financial situation of the individual Client or entity. Clients may request to impose a restriction on discretionary accounts relating to the types of investments or securities, in accordance with his/her beliefs. Since AAA primarily allocates advisory assets in mutual funds, we cannot guarantee that a restricted security is not a position in a mutual fund that is owned by a Client.

D. Wrap Fee Program

AAA acts a portfolio manager and sponsor of a wrap free program, which is a program where a Client pays one stated fee that includes advisory fees for portfolio management, transaction costs, and other certain administrative fees. This brochure describes AAA's general services; Clients should also see AAA's separate Wrap Free Program Brochure. AAA primarily manages assets in a wrap fee program. AAA does not manage wrap fee accounts any differently than it would manage a non-wrap fee account. AAA receives the advisory fee stated in Item 5 (or the Client's Investment Advisory Agreement) as a management fee under the wrap free program. Please see Item 5 and Item 12 of this brochure.

E. Regulatory Assets Under Management

Discretionary Amounts:	Non-Discretionary Amounts:	Date Calculated:
\$ 197,162,300	\$0.00	December 2019

ITEM 5. FEES AND COMPENSATION

A. Compensation for Advisory Services

AAA's annual fee for advisory services follows a tiered (blended) fee schedule:

Assets Under Management			Incremental Fee Rate
0	-	1,000,000	1.00%
1,000,000	-	2,000,000	0.80%
3,000,000	-	10,000,000	0.70%
10,000,000	-	20,000,000	0.60%
20,000,000	-	50,000,000	0.50%
50,000,000	-	100,000,000	0.40%
100,000,000	-	200,000,000	0.30%
200,000,000	+		0.20%

The advisory fee is calculated by multiplying the incremental fee rate for each range of AUM. AAA bills in arrears and the advisory fee is calculated using the value of the assets on the last business day of the billing period. Tiered fee schedules can be billed based on household market values.

AAA generally bills monthly based on the following calculation:

Sample Computation

$$\frac{\text{Annual Fee Rate \%}}{12} * AUM$$

Fees are negotiable and the final fee schedule is attached as Exhibit II of the Investment Advisory Contract. Clients may terminate the agreement without penalty for a full refund of AAA's fees within five business days of signing the Investment Advisory Contract. Thereafter, Clients may terminate the Investment Advisory Contract with 30 days written notice. AAA believes that its advisory fees are reasonable, but the firm's fees may be more than the cost of purchasing the same or comparable services through other investment advisors. AAA may, in its sole discretion, reduce, waive or calculate differently its fee with respect to certain Clients, including employees or family members.

Strategy Fees

As discussed in Item 4.B, Clients may elect to hire AAA for Investment Management services or choose to participate in a particular strategy with an associated Strategy Fee. Strategy Fees may vary, but the maximum combined annual fee a Client will pay for advisory fees and/or Strategy Fees is 2.50%.

Reporting Services

Clients and AAA may agree on a fee for Reporting Services, separate from the advisory fee set

forth in the above tiered fee schedule. AAA will monitor, oversee and report on external managers and investments for an agreed upon additional fee as disclosed in the investment management agreement.

Payment of Fees

AAA deducts advisory fees directly from Client accounts at the end of each billing period. Client provides written authorization to do so in the Investment Advisory Contract and the custodian account opening paperwork. A Client may request to be billed or invoiced for advisory fees. If AAA and Client agree to such an arrangement, AAA will invoice Client at the end of each billing period using an Intuit QuickBooks electronic invoice. If applicable, AAA will invoice Client for fees associated with Reporting Services, which are separate from the advisory fee.

Other Fees or Expenses

Clients utilizing AAA's Wrap Fee Program should see the separate Wrap Fee Program Brochure for additional details regarding third party fees.

For those Clients or accounts not participating in the Wrap Fee Program, they are responsible for the payment of all third-party fees (custodian fees, commissions, brokerage fees, transaction fees, etc.).

All Clients are subject to additional expenses, such as, mutual fund expenses, interest (margin) expense, or other fees that are separate and distinct from the fees and expenses associated with AAA. Please see Item 12 of this brochure for more details regarding broker/custodian.

Each Client will be responsible for certain charges imposed by unaffiliated third parties and incurred in connection with AAA's provision of the services, including in the course of the investment of, or arising from the investment or administration of each Client's assets. Clients will incur brokerage commissions and other transaction costs

B. Prepayment of Fees

AAA charges advisory fees in arrears. It does not collect fees in advance.

C. Outside Compensation for the Sale of Securities to Clients

Neither AAA nor its supervised persons accept any compensation for the sale of investment products, including asset-based sales charges or service fees from the sale of mutual funds.

ITEM 6. PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

AAA does not accept performance-based fees.

ITEM 7. TYPES OF CLIENTS

AAA offers services for individuals, trusts, families and/or small businesses in a family office style. There is no minimum account size.

ITEM 8. METHODS OF ANALYSIS, INVESTMENT STRATEGIES & RISK OF LOSS

A. Methods of Analysis and Investment Strategies

Methods of Analysis

AAA's methods of analysis include Fundamental analysis, Quantitative analysis, Technical Analysis, 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. Fundamental analysis attempts to measure the intrinsic value of a security to determine if the security is underpriced or overpriced.
- Quantitative analysis is a technique that seeks to understand behavior by using mathematical and statistical modeling, measurement and research.
- Technical analysis involves the analysis of historical chart patterns and past market data, such as, price, volume, money flows and investor behavior.
- Cyclical analysis measures the movements of a particular security against the overall stock market in an attempt to understand trends and predict the price movement of the security.

Investment Strategies

AAA uses long term trading, short term trading, short sales, option trading (including covered options, uncovered options or spread trades) and margin.

The primary investment strategy implemented in Client accounts is asset allocation. Based on the AAA's market and economic outlook and Client's profile, we consider factors such as income needs, risk/return profile, investment time horizon and tax consequences; we diversify investments across different asset classes and investment styles.

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

B. Material Risks Involved

Methods of Analysis

- Fundamental analysis involves risk as the inputs used in the analysis of a security may change suddenly or over time. The security is exposed to the movements of the broader market or the market may fail to reach the expectations of perceived value.
- Quantitative analysis involves risk as the investment strategy may act differently than expected as a result of the model. The construction and implementation of the model can be skewed as a result of trends, weight placed on each factor, or technical issues.
- Technical analysis involves risk as the market may not follow the discernible patterns recognized in the past. The market may perform with little or no connection to past patterns and new patterns can emerge over time.
- Cyclical analysis involves risk as cycles may invert or disappear either suddenly or over time.

Investment Strategies

General Risk of Loss

Investing in securities involves the risk of loss. Clients should be prepared to bear such loss. Investments in securities and other financial instruments and products are subject to many types of risk that can cause the permanent loss of capital as a result of adverse market conditions.

General Risks

- Currency Risk – fluctuations in “local” market security prices may result if positions are not hedged
- Geopolitical Risk – changes in the political status of any country can have profound effects on the value of securities within that country
- Liquidity Risk – particular investments may be difficult to sell at the best price at a particular point in time
- Market Risk – market prices of securities held may fall rapidly or dramatically due to a variety of unpredictable factors, including changing economic, political or market conditions
- Non-Diversification Risk – lack of diversification may result in stronger fluctuations in market value
- Sector Risk – companies that are in similar industry sectors may be similarly affected by particular economic or market events
- Volatility Risk – higher volatility may result in dramatic changes in security values
- Counterparty Risk – risk that either party to a contract will not meet their respective obligations

- Credit Risk – issuers of bonds or other debt securities may not be able to meet interest or principal payments when the bonds come due
- Credit Quality – lower quality bonds may experience a higher risk of default
- Duration – fluctuations in interest rates may have a greater impact on longer duration assets
- Inflation Risk – the price of an asset, or the income generated by an asset, may not keep up with the cost of living
- Interest Rate Risk – changing interest rates affect the value of bonds
- Municipal Market Risk – factors unique to the municipal bond market may negatively affect the value of municipal bonds, including risk of payment default and priority in which payments may be made by municipal issuers

Mutual Funds and Exchange Traded Funds

An investment in a mutual fund or ETF involves risk, including the loss of principal through trading. Mutual fund and ETF shareholders are also subject to the risks stemming from the individual issuers of the fund. Shareholders are also liable for taxes on any fund-level capital gains, as mutual funds and ETFs are required by law to distribute capital gains should they sell securities for a profit that cannot be offset by a corresponding loss.

Shares of mutual funds are generally distributed and redeemed on an ongoing basis by the fund itself or a broker acting on its behalf. The trading price at which a share is transacted is equal to a fund's stated daily per share net asset value ("NAV"), plus any shareholder costs (e.g., sales loads, purchase fees, redemption fees). The per share NAV of a mutual fund is calculated at the end of each business day, although the actual NAV fluctuates with intraday changes to the market value of the fund's holdings. The trading prices of a mutual fund's shares may differ significantly from the NAV during periods of market volatility, which may, among other factors, lead to the mutual fund's shares trading at a premium or discount to NAV.

Shares of ETFs are listed on securities exchanges and transacted at negotiated prices in the secondary market. Generally, ETF shares trade at or near their most recent NAV, which is generally calculated at least once daily for indexed-based ETFs and more frequently for actively managed ETFs. However, certain inefficiencies may cause the shares to trade at a premium or discount to their pro rata NAV. There is also no guarantee that an active secondary market for such shares will develop or continue to exist. Generally, an ETF only redeems shares when aggregated as creation units (usually 50,000 shares or more). Therefore, if a liquid secondary market ceases to exist for shares of a particular ETF, a shareholder may have no way to dispose of such shares.

Fund overlap is a situation where an investor invests in several mutual funds with overlapping positions. Fund overlap can be caused by owning several mutual funds or

exchange-traded funds (ETFs). Fund overlap reduces the benefits of diversification for the investor.

Market Risks

The profitability of a significant portion of the Advisor's recommendations may depend to a great extent upon correctly assessing the future course of price movements of stocks (either long, or, short positions) and bonds. There can be no assurance that the Advisor will be able to predict those price movements accurately over a sustained period of time.

Use of Margin

Margin transactions use leverage that is borrowed from a brokerage firm as collateral. When losses occur, the value of the margin account may fall below the brokerage firm's threshold thereby triggering a margin call. This may force the account holder to either allocate more funds to the account or sell assets on a shorter time frame than desired.

Options transactions involve a contract to purchase a security at a given price, not necessarily at market value, depending on the market. This strategy includes the risk that an option may expire out of the money resulting in minimal or no value, as well as the possibility of leveraged loss of trading capital due to the leveraged nature of stock options.

Short sales entail the possibility of infinite loss. An increase in the applicable securities' prices will result in a loss and, over time, the market has historically trended upward.

Use of Independent Managers

The Advisor may recommend the use of Independent Managers for certain Clients. The Advisor will continue to do ongoing due diligence of such managers, but such recommendations rely, to a great extent, on the Independent Manager's ability to successfully implement their investment strategy. In addition, the Advisor does not have the ability to supervise the Independent Managers on a day-to-day basis.

Use of Private Pooled Investment Vehicles

The Advisor may recommend the investment by certain Clients into private pooled investment vehicles (some of which may be typically called "hedge funds"). The managers of these vehicles (which may include the Advisor with respect to an affiliated Fund) will have broad discretion in selecting the investments. There are few limitations on the types of securities or other financial instruments which may be traded and no requirement to diversify. The hedge funds may trade on margin or otherwise leverage positions, or utilize short-selling or derivatives, thereby potentially increasing the risk to the vehicle. In addition, there may be restricted liquidity, and because the vehicles are not registered as investment companies, there is an absence of regulation. There are numerous other risks in investing in these private funds. The Client will receive a private placement memorandum and/or other documents explaining such risks.

Real estate funds

Real Estate Funds (including REITs) face several kinds of risk that are inherent in the real estate sector, which historically has experienced significant fluctuations and cycles in performance. Revenues and cash flows may be adversely affected by: changes in local real estate market conditions due to changes in national or local economic conditions or changes in local property market characteristics; competition from other properties offering the same or similar services; changes in interest rates and in the state of the debt and equity credit markets; the ongoing need for capital improvements; changes in real estate tax rates and other operating expenses; adverse changes in governmental rules and fiscal policies; adverse changes in zoning laws; the impact of present or future environmental legislation and compliance with environmental laws.

Cyber Risk

AAA's information and technology systems may be vulnerable to damage or interruption from computer viruses, network failures, computer and telecommunication failures, infiltration by unauthorized persons and security breaches, usage errors by their respective professionals, power outages and catastrophic events such as fires, tornadoes, floods, hurricanes and earthquakes. The failures of these systems or the failure of AAA's Disaster Recovery Plans for any reason could cause significant interruptions in the AAA's operations and result in a failure to maintain the security, confidentiality or privacy of sensitive data, including private information relating to Clients.

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

C. Material, Significant, or Unusual Risks

Certain investment strategies are signal based and utilize market timing techniques and/or leveraged products. Managers often rely on decision making models that, if incorrect, can result in significant losses over a short period of time. AAA is aware of these risks and will only allocate Client assets in a manner that is consistent with the Client's profile. However, as discussed in Item 4.B and Item 5.A, Clients may elect to hire and direct AAA solely to invest in certain strategies in a particular weighting. If applicable, AAA will invest Client assets consistent with its fiduciary duty, but may not be privy to the Client's overall net worth for the purposes of monitoring the suitability of these investments over time.

ITEM 9. DISCIPLINARY INFORMATION

AAA has no criminal or civil actions to report, no administrative proceedings to report and no self-regulatory organization (SRO) proceedings to report.

ITEM 10. OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

A. Registration as a Broker/Deal or Broker/Deal Representatives

Neither AAA nor its representatives are reregistered as, or have pending application to become, a broker/dealer or a representative of a broker/dealer.

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

Neither AAA nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

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

- Vivek Verma provides research to other investment advisers for a fee.
- Vivek Verma is on the board of directors for India Growth Fund Limited.

D. Selection of Other Advisers or Managers and Adviser Compensation

AAA may direct Clients to third-party investment advisers. AAA does not accept compensation from third-party advisers. AAA may continue to receive the standard fee from the Client as part of the overall advisory fee or as part of the Reporting Service. The Client will pay the third-party adviser the standard fee for services, which will be known to Client at the time of engaging with the third-party adviser. AAA will always act in the best interest of the Client when determining which third-party investment advisers to recommend.

ITEM 11. CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

A. Code of Ethics

AAA has a written Code of Ethics that covers the following areas:

AAA has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. AAA's Code of Ethics is available free upon request to any Client or prospective Client.

B. Recommendations Involving Material Financial Interests

AAA typically does not have any material financial interest in the securities it recommends to Clients.

C. Investing Personal Money in the Same Securities as Clients

Representatives and related persons of AAA may buy or sell securities for themselves that they also recommend to Clients. Such transactions may create a conflict of interest if a representative or related person of AAA buys or sells the same security before or after recommending the security to a Client, profiting off the recommendation. AAA does not allow its representatives or related persons to engage in trading that is to a Client's disadvantage. AAA will document any transactions that could be construed as a conflict of interest. AAA maintains a restricted securities list. Representatives and related persons of AAA must first receive written approval from the CCO before purchasing/selling any restricted security or its derivatives.

D. Trading Securities at/around the Same Time as Clients' Securities

Representatives and related persons of AAA may buy or sell securities for themselves that they also recommend to Clients. Such transactions may create a conflict of interest if a representative or related person of AAA buys or sells the same security before or after recommending the security to a Client, profiting off the recommendation. AAA does not allow its representatives or related persons to engage in trading that is to a Client's disadvantage. AAA will document any transactions that could be construed as a conflict of interest. AAA maintains a restricted securities list. Representatives and related persons of AAA must first receive written approval from the CCO before purchasing/selling any restricted security or its derivatives.

ITEM 12. BROKERAGE PRACTICES

Custodians/broker-dealers will be recommended based on AAA's duty to seek "best execution," which is the obligation to seek execution of securities transactions for a Client on the most favorable terms for the Client under the circumstances. Clients will not necessarily pay the lowest commission or commission equivalent, and AAA may also consider the market expertise and research access provided by the broker-dealer/custodian, including but not limited to access to written research, oral communication with analysts, admittance to research conferences and other resources provided by the brokers that may aid in AAA's research efforts. AAA will never charge a premium or commission on transactions, beyond the actual cost imposed by the broker-dealer/custodian.

AAA recommends TD Ameritrade Institutional, a division of TD Ameritrade, Inc. Member FINRA/SIPC.

Advisor participates in the TD Ameritrade Institutional program. TD Ameritrade Institutional is a division of TD Ameritrade, Inc. ("TD Ameritrade") member FINRA/SIPC. TD Ameritrade is an independent [and unaffiliated] SEC-registered broker-dealer. TD Ameritrade offers to independent investment Advisors services which include custody of securities, trade execution, clearance and settlement of transactions. Advisor receives some benefits from TD Ameritrade through its participation in the program. There is no direct link between AAA's participation in the program and the investment advice it gives to its Clients, although AAA receives economic benefits through its participation in the program that is typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving AAA participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to AAA by third party vendors. TD Ameritrade may also have paid for business consulting and professional services received by AAA's related persons. Some of the products and services made available by TD Ameritrade through the program may benefit AAA but may not benefit its Client accounts. These products or services may assist AAA in managing and administering Client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help AAA manage and further develop its business enterprise. The benefits received by AAA or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to Clients, AAA endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits by AAA or its related persons in and of itself creates a

potential conflict of interest and may indirectly influence the AAA's choice of TD Ameritrade for custody and brokerage services.

AAA also receives from TD Ameritrade certain additional economic benefits ("Additional Services") that may or may not be offered to any other independent investment Advisors participating in the program. Specifically, the Additional Services include Addepar, Inc. TD Ameritrade provides the Additional Services to AAA in its sole discretion and at its own expense, and AAA does not pay any fees to TD Ameritrade for the Additional Services. AAA and TD Ameritrade have entered into a separate agreement ("Additional Services Addendum") to govern the terms of the provision of the Additional Services. AAA's receipt of Additional Services raises potential conflicts of interest. In providing Additional Services to AAA, TD Ameritrade most likely considers the amount and profitability to TD Ameritrade of the assets in, and trades placed for, AAA's Client accounts maintained with TD Ameritrade. TD Ameritrade has the right to terminate the Additional Services Addendum with AAA, in its sole discretion, provided certain conditions are met. Consequently, in order to continue to obtain the Additional Services from TD Ameritrade, AAA may have an incentive to recommend to its Clients that the assets under management by AAA be held in custody with TD Ameritrade and to place transactions for Client accounts with TD Ameritrade. AAA's receipt of Additional Services does not diminish its duty to act in the best interests of its Clients, including to seek best execution of trades for Client accounts.

1. Research and Other Soft-Dollar Benefits

While AAA has no formal soft dollars program in which soft dollars are used to pay for third party services, AAA may receive research, products, or other services from custodians and broker-dealers in connection with Client securities transactions ("soft dollar benefits"). AAA may enter into soft-dollar arrangements consistent with (and not outside of) the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended. There can be no assurance that any particular Client will benefit from soft dollar research, whether or not the Client's transactions paid for it, and AAA does not seek to allocate benefits to Client accounts proportionate to any soft dollar credits generated by the accounts. AAA benefits by not having to produce or pay for the research, products or services, and AAA will have an incentive to recommend a broker-dealer based on receiving research or services. Clients should be aware that AAA's acceptance of soft dollar benefits may result in higher commissions charged to the Client.

2. Brokerage for Client Referrals

AAA receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

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

AAA may permit Clients to direct it to execute transactions through a specified broker-dealer. If a Client directs brokerage, then the Client will be required to acknowledge in writing that the

Client's direction with respect to the use of brokers supersedes any authority granted to AAA to select brokers; this direction may result in higher commissions, which may result in a disparity between free and directed accounts; the Client may be unable to participate in block trades (unless AAA is able to engage in "step outs"); and trades for the Client and other directed accounts may be executed after trades for free accounts, which may result in less favorable prices, particularly for illiquid securities or during volatile market conditions. Not all investment advisers allow their Clients to direct brokerage.

B. Aggregating (Block) Trading for Multiple Client Account

If AAA buys or sells the same securities on behalf of more than one Client, then it may (but would be under no obligation to) aggregate or bunch such securities in a single transaction for multiple Clients in order to seek more favorable prices, lower brokerage commissions, or more efficient execution. In such case, AAA would place an aggregate order with the broker on behalf of all such Clients in order to ensure fairness for all Clients; provided, however, that trades would be reviewed periodically to ensure that accounts are not systematically disadvantaged by this policy. AAA would determine the appropriate number of shares and select the appropriate brokers consistent with its duty to seek best execution, except for those accounts with specific brokerage direction (if any).

ITEM 13. REVIEW OF ACCOUNTS

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

All managed Client accounts are reviewed at least annually by an investment adviser representative to ensure allocations are consistent with the Client's risk/return profile.

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

A non-periodic review of a Client's accounts may be triggered as a result of material market, economic or political events, or by changes in the Client's financial situation or goals. Client may request a review of accounts at any time.

C. Content and Frequency of Regular Reports Provided to Clients

Each Client of AAA with an account will receive a report from the custodian in the form of a statement. Statements are generally delivered monthly, detailing the Client's account, holdings, asset value, and transactions (including fees). AAA may also deliver consolidated reporting to Clients, either by mail or electronically. Client should carefully compare the reports with the statements they receive from the custodian, market values may differ as a result of calculation methods.

ITEM 14. CLIENT REFERRALS AND OTHER COMPENSATION

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

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

B. Compensation to Non-Advisory Personnel for Client Referrals

AAA does not directly or indirectly compensate non-advisory personnel for Client referrals.

ITEM 15. CUSTODY

AAA deducts advisory fees directly from Client accounts at the custodian. AAA will be deemed to have limited custody of Client's assets. AAA may only debit fees from Client accounts with written authorization. Client will receive account statements directly from the custodian at least quarterly, typically monthly. AAA urges Clients to carefully review the statements they receive from the custodian for accuracy.

AAA's Client accounts will be held in custody by unaffiliated qualified custodians. AAA will not have physical custody of any Client assets.

AAA generally will not have custody of the assets of its Clients, since it will not have the authority to hold, directly or indirectly, such Clients' funds or securities or have the authority to obtain possession of them.

ITEM 16. INVESTMENT DISCRETION

AAA manages Client assets on a discretionary and non-discretionary basis. Both the standard Investment Advisory Agreement and Client account agreement grant AAA discretionary authority over Client accounts. Where investment discretion has been granted, AAA will trade securities and make investment decisions without consultation with the Client. The choice of security, direction (buy/sell), quantity, market value and order type are determined solely by AAA. Client may impose reasonable restrictions on AAA's discretionary authority or investment approach, which should be provided by the Client to AAA in writing. AAA will always managed Client assets consistent with the investment objectives of the Client.

AAA may provide non-discretionary investment management services with respect to each Client's investable assets. AAA will work with each Client to develop investment guidelines based on the Client's investment objectives, risk tolerance, and other factors. AAA will make recommendations to each Client with respect to asset allocation and the investment and

reinvestment of the Client's assets, but shall purchase or sell securities or other financial instruments for each Client's account only upon the Client's authorization.

ITEM 17. VOTING CLIENT SECURITIES

AAA has the ability to vote proxies for Clients who have authorized AAA to do so. AAA will follow the standard policies and procedures with respect to voting proxies for securities that AAA has discretion authority to buy or sell the security on behalf of Clients. If AAA does not have discretionary authority, typically those accounts that are Client directed and not charged an advisory fee, AAA will not vote the proxies unless otherwise directed by the Client. If Client chooses to direct proxy voting material to AAA for non-managed securities, AAA will typically not review the issues presented in the proxy material or vote on behalf of the Client. AAA has the right to vote proxy material in the best interest of the Client without providing notice to the Client.

Proxy Voting Policies and Procedures

Upon receiving proxy material, AAA will review the issues presented and make a decision to vote for, against or abstain on each of the issues presented. AAA generally supports proposals that are likely to maximize shareholder value. AAA generally opposes proposals that are likely to restrict management's ability to maximize shareholder value. Clients may request to AAA in writing to vote for, against or abstain on a proposal. AAA will make a reasonable effort to accommodate the Client's request.

Conflicts of Interest

In the unlikely event that AAA is presented with a material conflict between AAA's interest and a Client's interest, AAA will resolve the manner as follows:

- If applicable, follow the guidelines presented in AAA's Proxy Voting Policies and Procedures
- AAA will disclose the conflict of interest to the relevant Clients and obtain their consent to the proposed vote. AAA will sufficiently explain the conflict and clearly outline the Clients' options. If a Client chooses not to respond to AAA's inquiry, AAA will abstain from voting the proposal.
- Client can direct AAA to forward the proxy material to an independent third party selected by the Client. AAA will vote the proposal consistent with the independent third party's recommendation. If the independent third party does not respond in a timely manner, AAA will abstain from voting the Client proposal.

More Information

Client can request, in writing, information on how proxies for their shares were voted. Client

can request a copy of AAA's Proxy Voting Policies and Procedures free of charge, which will be delivered in a timely manner to the Client. Requests should be made to AAA's Chief Compliance Officer at (917) 810-5530, or by email to domani@domaniadvisors.com.

ITEM 18. FINANCIAL INFORMATION

AAA is not required to provide financial information to Clients because:

- AAA does not require or solicit prepayment of more than \$1,200 in fees per Client, six months or more in advance.
- AAA nor its management has any financial conditions that is likely to reasonably impair AAA's ability to meet contractual commitments to Clients.
- AAA has not been the subject of a bankruptcy petition in the last ten years.