

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

FIRM BROCHURE – WRAP FEE PROGRAM

ITEM 1 COVER PAGE

March 30, 2020

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FIRM CRD #291796

This wrap 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, American Alpha Advisors, LLC (hereinafter “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 Clients 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 Clients 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 6 – Portfolio Manager Selection and Evaluation
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ITEM 4. ADVISORY BUSINESS

A. Description of Advisory Services

American Alpha Advisors, LLC (hereinafter “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 provides portfolio management to Clients under this wrap fee program as sponsor and portfolio manager.

AAA offers ongoing wrap fee portfolio management 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. AAA will request discretionary authority from Clients in order to select securities and execute transactions without permission from the Client prior to each transaction. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each Client.

B. 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.

Portfolio management fees are withdrawn directly from the Client's accounts with Client's written authorization on a monthly basis. Fees are paid in arrears. AAA uses the value of the account as of the last business day of the billing period, after taking into account deposits and withdrawals, for purposes of determining the market value of the assets upon which the advisory fee is based.

C. Contribution Cost Factors

The program may cost the Client more or less than purchasing such services separately. There are several factors that bear upon the relative cost of the program, including the trading activity in the Client's account, the adviser's ability to aggregate trades, and the cost of the services if provided separately (which in turn depends on the prices and specific services offered by different providers).

D. Additional Fees

AAA will wrap third party fees (i.e., custodian fees, brokerage fees, mutual fund ticket fees, transaction fees, etc.) for wrap fee portfolio management accounts. AAA will charge Client one fee, and pay all transaction fees using the fee collected from the Client. Accounts participating in the wrap fee program are not charged higher advisory fees based on trading activity, but Clients should be aware that AAA has an incentive to limit trading activities for those accounts since the firm absorbs those transaction costs.

Certain other fees are not included in the wrap fee and are paid for separately by the Client. These include, but are not limited to, margin costs, charges imposed directly by a mutual fund or exchange traded fund, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer

and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions.

Accounts participating in the wrap fee program are not charged higher advisory fees based on trading activity, but Clients should be aware that AAA has an incentive to limit trading activities for those accounts since the firm absorbs those transaction costs. To address this conflict, AAA will always act in the best interest of its Clients consistent with its fiduciary duty as an investment adviser.

E. Compensation of Client Participation

Neither AAA, nor any representatives of AAA receive any additional compensation beyond advisory fees for the participation of Client's in the wrap fee program. However, compensation received may be more than what would have been received if Client paid separately for investment advice, brokerage, and other services. Therefore, AAA may have a financial incentive to recommend the wrap fee program to Clients.

ITEM 5: 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 6: PORTFOLIO MANAGER SELECTION AND EVALUATION

A. Selecting/Reviewing Portfolio Managers

AAA will not select outside portfolio managers for management of this wrap fee program; it will be the sole portfolio manager for this wrap fee program.

AAA will use industry standards to calculate portfolio manager performance. AAA reviews the performance information to determine and verify its accuracy and compliance with presentation standards. The performance information is reviewed annually by AAA.

B. Related Persons

AAA and its personnel serve as the portfolio managers for all wrap fee program accounts. This is a conflict of interest in that no outside adviser assesses AAA's management of the wrap fee program. However, AAA addresses this conflict by acting in its Clients' best interest consistent with its fiduciary duty as sponsor and portfolio manager of the wrap fee program.

C. Advisory Business

See Item 4 of this Wrap Fee Program Brochure for information about our wrap fee advisory programs. We offer individualized investment advice to Clients utilizing the services described in Item 4 of this Wrap Fee Program Brochure. Each Client has the opportunity to place reasonable restrictions on the types of investments to be held in the portfolio

D. Services Limited to Specific Types of Investments

AAA generally limits its investment advice to mutual funds, ETFs, REITs, bonds, individual stocks, or options to help diversify or hedge a portfolio.

E. Client Tailored Services and Client Imposed Restrictions

AAA will tailor a program for each individual Client. This will include an interview session to get to know the Client's specific needs and requirements as well as a plan that will be executed by AAA on behalf of the Client. AAA may use model allocations together with a specific set of recommendations for each Client based on their short-term and long-term objectives, targets, and personal restrictions. Clients are permitted to impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs.

F. Wrap Fee Programs

As discussed herein, AAA sponsors and acts as portfolio manager for this wrap fee program. AAA manages the investments in the wrap fee program, but does not manage those wrap fee accounts any differently than it would manage non-wrap fee accounts. The fees paid to the wrap account program will be given to AAA as a management fee.

G. Amounts Under Management

AAA has the following assets under management:

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

H. Performance-Based Fees and Side-By-Side Management

AAA does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a Client.

I. 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.

A. 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
- Fixed Income Risks
- 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.

B. 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 of the ADV Part 2A, 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.

Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a Client, should be prepared to bear.

J. Voting Client Securities (Proxy Voting)

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 7: CLIENT INFORMATION PROVIDED TO PORTFOLIO MANAGERS

All Client information material to managing the portfolio (including basic information, risk tolerance, sophistication level, and income level) is provided to the portfolio manager. The portfolio manager will also have access to that information as it changes and is updated.

ITEM 8: CLIENT CONTACT WITH PORTFOLIO MANAGERS

AAA does not restrict Clients from contacting portfolio managers. AAA's representatives can be contacted during regular business hours using the information on the Form ADV Part 2A or ADV Part 2B cover page.

ITEM 9: ADDITIONAL INFORMATION

A. Disciplinary Action and Other Financial Industry Activities

Criminal or Civil Actions

There are no criminal or civil actions to report.

Administrative Proceedings

There are no administrative proceedings to report.

Self-Regulatory Organization (SRO) Proceedings

There are no self-regulatory organization proceedings to report.

Registration as a Broker/Dealer or Broker/Dealer Representative

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

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.

Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests

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

Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections

AAA does not select third-party investment advisers.

B. Code of Ethics, Client Referrals, and Financial Information

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.

C. Recommendations Involving Material Financial Interests

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

D. 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.

E. 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.

F. Frequency and Nature of Periodic 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.

G. 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.

H. 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.

I. Economic Benefits Provided by Third Parties for Advice Rendered to Clients

AAA participates in the institutional advisor program (the "Program") offered by TD Ameritrade Institutional, a division of TD Ameritrade, Inc. Member FINRA/SIPC ("TD Ameritrade"). TD Ameritrade offers to independent investment advisor services which include custody of

securities, trade execution, clearance and settlement of transactions. AAA receives some benefits from TD Ameritrade through its participation in the Program.

As disclosed above, AAA participates in TD Ameritrade's institutional advisor program and AAA may recommend TD Ameritrade to Clients for custody and brokerage services. 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 are 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 AAA's 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 pay 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 conflict of interest and may indirectly influence the AAA's choice of TD Ameritrade for custody and brokerage services.

Advisor 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 Advisor in its sole discretion and at its own expense, and Advisor does not pay any fees to TD Ameritrade for the Additional Services. Advisor and TD Ameritrade have entered into a separate agreement ("Additional Services Addendum") to govern the terms of the provision of the Additional Services. Advisor's receipt of Additional Services raises potential conflicts of interest. In providing Additional Services to Advisor, TD Ameritrade most likely considers the amount and profitability to TD Ameritrade of the assets in, and trades placed for, Advisor's Client accounts maintained with TD Ameritrade. TD Ameritrade has the right to terminate the Additional Services Addendum with Advisor, in its sole discretion, provided certain conditions are met. Consequently, in order to continue to obtain the Additional Services from TD Ameritrade, Advisor may have an incentive to recommend to its Clients that the assets under management by Advisor be held in custody with TD Ameritrade and to place transactions for Client accounts with TD Ameritrade. Advisor'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.

J. Compensation to Non – Advisory Personnel for Client Referrals

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

K. Balance Sheet

AAA neither requires nor solicits prepayment of more than \$1,200 in fees per Client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

L. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

AAA does not have any financial condition that would impair its ability to meet contractual commitments to Clients.

M. Bankruptcy Petitions in Previous Ten Years

AAA has not been the subject of a bankruptcy petition.