



# Forté Asset Management, LLC

476 Long Ridge Road  
Bedford, NY 10506  
914-234-0281

[www.forteassets.com](http://www.forteassets.com)

January 12, 2021

Part 2A of Form ADV (the “**Disclosure Brochure**” or “**Brochure**”), as required by the Investment Advisers Act of 1940 (the “**Advisers Act**”), provide important information about Forté Asset Management, LLC (the “**Registrant**” or “**FAM**”), a registered investment adviser with the United States Securities and Exchange Commission (the “**SEC**”).

This Brochure provides information about the Registrant’s qualifications and business practices. If you have any questions about the contents of this Brochure, please contact Timothy I. Low, President of Forté Asset Management, LLC, at 914-234-0281. Additional information about the Registrant is also available on the SEC’s website, [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) (click on the link “Investment Adviser Search,” select “Firm” and type in the Registrant’s name). Results will provide you with Parts 1 and 2A of the Registrant’s Form ADV.

The information in this disclosure brochure has not been approved or verified by the SEC or by any state securities authority. The Registrant’s registration as an investment adviser does not imply a certain level of skill or training. The oral and written communications the Registrant provides to you, including this Brochure, serve as information for you to use to evaluate the Registrant and should be considered in your decision whether to invest in an investment vehicle advised by the Registrant.

## 2. MATERIAL CHANGES

This Brochure contains important information about the Registrant. This Brochure is intended to provide potential and existing clients with an overview of the Registrant. It also contains important disclosures such as certain practices of the Registrant, potential material conflicts that may arise and key potential investment risks. The Registrant may, at any time, update this Brochure and either send or offer to send a copy to you (either by electronic means (email) or in hard copy form).

There are no material changes to this Brochure since the last update dated January 12, 2020, which was posted on the SEC's public disclosure website, [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

### 3. TABLE OF CONTENTS

1. COVER PAGE
2. MATERIAL CHANGES
3. TABLE OF CONTENTS
4. ADVISORY BUSINESS
  - 1.1 Company
  - 1.2 Services
  - 1.3 Assets Under Management
5. FEES AND COMPENSATION
  - a. Investment Management Fees
  - b. 401k Retirement Consulting Fees
  - c. Important Additional Information
6. PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT
7. TYPES OF CLIENTS
  - a. Engaging the Services of Forté Asset Management, LLC
8. METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS
  - a. Types of Investments
  - b. Investment Strategies
  - c. Security Analysis
  - d. Sources of Information
  - e. Risk
  - f. Cash Management
9. DISCIPLINARY INFORMATION
10. OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS
11. CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING
  - a. Code of Ethics
  - b. Prohibition on Use of Insider Information
  - c. Participation or Interest in Client Transactions
12. BROKERAGE PRACTICES
  - a. Best Execution
  - b. Broker Analysis
  - c. Research/Soft Dollar Benefits
  - d. Brokerage Selection

- e. Trade Aggregation/Allocation
- f. Trade Errors

### 13. REVIEW OF ACCOUNTS

- a. Reviews
- b. Reports

### 14. CLIENT REFERRALS AND OTHER COMPENSATION

### 15. CUSTODY

### 16. INVESTMENT DISCRETION

### 17. VOTING CLIENT SECURITIES

- a. Proxy Voting
- b. Class Actions

### 18. FINANCIAL INFORMATION

- a. Payment of Fees
- b. Financial Condition
- c. Bankruptcy

## PRIVACY NOTICE

## COMPLAINTS

ADV PART 2B – Timothy I. Low

## 4. ADVISORY BUSINESS

### 4.1 Company

Forté Asset Management, LLC is a privately-held New York limited liability company that has been providing investment advisory services as an SEC-registered investment adviser since July 2005. Throughout this disclosure brochure Forté Asset Management, LLC is referred to as “FAM.”

The principal owner of Forté Asset Management, LLC is Timothy I. Low.

### 4.2 Services

#### Investment Management Services

FAM provides personalized investment management services which consist of giving continuous advice to a client or making investments for a client based on the individual needs of the client. Through personal discussions, during which a client's goals and objectives are established, FAM and the client determine the client's risk profile and investment guidelines. FAM will then create and manage a customized portfolio based on the client's risk profile and investment guidelines. FAM will allocate the client's assets among various investments based on the client's risk tolerance. FAM's management of the client's account will be based on the client's investment objective.

Clients will have the opportunity to place reasonable restrictions on the types of investments which will be made on the client's behalf. Clients will retain individual ownership of all securities.

Management of investment portfolios may be either a discretionary or nondiscretionary basis or some combination thereof. For those accounts where FAM is granted discretion, FAM may take any action or non-action as it deems appropriate, with or without further consent or authority from the client and may exercise its discretion and deal with such assets exactly as the client might do as owner, except that FAM is not authorized to withdraw money or securities in the name of the client or otherwise. FAM shall be free to sell securities from the account without regard to the length of time they have been held or the gain or loss that may be realized. FAM shall be free to make investment changes without regard to the rate of portfolio turnover, when it, in its sole discretion, determines that such changes will promote the investment objective of the account.

### 4.3 Assets Under Management

As of December 31, 2020, the total amount of client assets managed by FAM were approximately \$189,044,421. Of this total, \$189,044,421 are managed on a discretionary basis and \$0 on a non-discretionary basis.

## 5. FEES AND COMPENSATION

## 5.1 Investment Management Services Fees

The annual fee for investment management services will be charged as a percentage of assets under management. The table below shows the maximum annual fee for portfolio management services. The actual fee charged may be less than the maximum fee shown below depending upon the size and complexity of the client's account:

Assets Under Management	Maximum Annual Fee (%)
First \$500,000	0.90%
Next \$500,000	0.80%
Next \$1 Million	0.70%
Next \$3 Million	0.50%
Next \$5 Million	0.30%
Over \$10 Million	0.25%

FAM's annual investment management fee is prorated and paid quarterly, in advance, based upon the market value of the assets on the last business day of the previous quarter. If assets in excess of \$100,000 are deposited into an account after the inception of a quarter, the fee payable with respect to such assets may be adjusted or prorated based on the number of days remaining in the quarter. For the initial quarter of investment management services, the initial fee shall be calculated on a *pro rata* basis.

Unless otherwise agreed to, FAM's investment management agreement and/or the separate agreement the client enters into with the account custodian will authorize FAM, through the account custodian, to debit the client's account for the amount of FAM's fee and to directly remit that fee to FAM. Details of the investment management fee charged are more fully described in the advisory agreement entered into with each client.

## 5.2 Important Additional Fee Information

### Fees Negotiable

FAM retains the right to modify fees on a client-by-client basis based on the size, complexity and nature of the advisory services provided. To the extent that fees are negotiable, they may differ from client to client based upon a number of factors, including, but not limited to: the type and size of the account, the historical and expected size or number of trades for the account, and the number and range of supplemental advisory and client-related services to be provided to the account.

### Debit Balances

Interest will be charged to a client's account should the account have a debit balance as a result of the client's activity. Any debit balance will not be deducted from the account balance for purpose of the calculation of the advisory fee due to FAM.

### Direct Debiting of Client Accounts

In order for FAM's advisory fees to be directly debited from a client's account, the client must provide written authorization permitting FAM to bill the custodian. In addition, the account must be held by a qualified custodian and the qualified custodian must agree to send to the client an account statement on at least a quarterly basis. The account statement must indicate all amounts disbursed from the account including the amount of advisory fees paid directly to FAM. Clients are informed that it is their responsibility to verify the accuracy of the fee calculation and that the account custodian will not determine whether the fee is properly calculated.

### Termination of Client Relationship

A client has the right to terminate the investment management agreement without penalty within five (5) business days after entering into such agreement. In addition, the investment management agreement may be cancelled at any time, by either party, for any reason upon written or verbal notice. In the event of termination, the client will receive a pro-rata refund of the quarterly advisory fee based on the number of days remaining in the billing period. Refunds will be issued by check within 10 business days.

### Exchange Traded Funds

Exchange traded funds ("ETFs") pay the sponsor of the ETF an investment advisory fee. Therefore, in addition to the fee a client pays FAM to manage its account, the client will indirectly pay its pro rata portion of the management fee of the ETF in which its account is invested.

### Trading and Other Costs

All fees paid to FAM for investment advisory services are separate and distinct from transaction fees charged by broker dealers associated with the purchase and sale of equity securities, fixed-income securities and options. In addition, fees do not include the services of any co-fiduciaries, accountants, broker dealers or attorneys. Please see the section entitled "Brokerage Practices" on page 12 of this disclosure brochure for additional information on brokerage and other transaction costs.

## **6. PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT**

FAM does not accept performance-based fees (*e.g.*, fees based on a share of capital gains on or capital appreciated of the assets in a client's account).

## **7. TYPES OF CLIENTS**

FAM provides investment advisory services to individuals (including high net worth individuals and individual IRAs and SEP IRAs), trusts, estates, charitable organizations, corporations and other types of business entities.

### **7.1 Engaging the Services of FAM**

All clients wishing to engage FAM for investment advisory services must sign an investment management agreement that governs the relationship with FAM. The investment management agreement describes the services and responsibilities of FAM to the client. It also outlines FAM's fee in detail.

In addition to completing FAM's internal documents (e.g., investment management agreement), clients must complete certain broker-dealer/custodial documentation. Upon completion of these documents, FAM will be considered engaged by the client. A client has an ongoing responsibility for ensuring that FAM is informed in a timely manner of changes in the client's investment objectives and risk tolerance.

### **Conditions for Opening Accounts**

FAM does not impose a minimum account size or set a minimum annual fee.

## **8. METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS**

### **8.1 Types of Investments**

FAM primarily invests client assets in its brokerage services program in exchange traded funds (ETFs). In considering ETFs for investment, FAM seeks ETFs with high trading volume for liquidity purposes, and monitors ETFs to ensure they trade closely to their respective net asset values. FAM invests in ETFs in various asset classes, such as: U.S. equity (large cap, small cap, etc.); international equity; fixed income; commodities; and market short ETFs (such as short U.S. bond or U.S. equity indexes). FAM may also invest client assets in leveraged ETFs as well as in domestic and foreign equity securities, mutual funds, bonds, and options.

### **8.2 Investment Strategies**

FAM utilizes an institutional approach in its investment management by focusing on the risk of the entire portfolio by considering how each investment contributes to the overall risk of the portfolio. Through this process, FAM constructs an "efficient portfolio" – one which has the highest expected return for a given level of risk. Asset allocation decisions are derived from broad-based investment research into multiple asset classes. These decisions are not based on the day-to-day market conditions. The allocations are customized to each investor's return objective, risk tolerance, and cash flow requirements with a primary focus on allocation among stocks, bonds and cash. Further customization is achieved through secondary allocations among domestic and foreign stocks, large, mid



and small-cap stocks, various alternative investments and, fixed income securities.

FAM often utilizes a dynamic strategy called tactical asset allocation that actively adjusts client portfolios based on short-term market forecasts. Its objective is to systematically exploit inefficiencies or temporary imbalances in equilibrium values among different asset or sub-asset classes. FAM generally limits tactical asset allocation shifts to 20 percent of the portfolio to avoid straying too far from the long-term strategy mix.

### **8.3 Security Analysis**

FAM employs a wide range of methods to evaluate investments and manage portfolios, including fundamental analysis and technical analysis.

### **8.4 Sources of Information**

In conducting security analysis, FAM may utilize the following sources of information: company SEC filings, press releases, company websites, financial news and quotations services, financial data providers, financial newspapers and magazines, financial weblogs, and financial websites.

### **8.5 Risk**

#### In General

Investing in securities involves risk of loss that each client should be prepared to bear. Typical investment risks include market risk typified by a drop in a security's price due to a company specific event (e.g. unsystematic risk), or general market activity (e.g., systematic risk). In addition, certain strategies may impose more risk than others. For example, with fixed income securities, a period of rising interest rates could erode the value of bond since bond values generally fall as bond yields rise. Investment risk with international equities also includes fluctuation in currency values, differences in accounting and economic and political instability.

#### Exchange Traded Funds (ETFs)

Equity-based exchange traded funds are subject to risks similar to those of stocks. If the securities tracked within an ETF decline due to weakening fundamentals, crumbling technical support, global events, or any other market fluctuations, the value of the ETF will go down. Fixed income-based ETFs are subject to risks similar to those of bonds such as increasing interest rates. Investment returns will fluctuate and are subject to market volatility, so that an investor's ETF shares, when redeemed or sold, may be worth more or less than their original cost.

#### Leveraged ETFs

Most leveraged ETFs seek to provide a multiple of the investment returns of a given index or benchmark on a daily basis. Inverse ETFs seek to provide the opposite of the

investment returns, also daily, of a given index or benchmark, either in whole or by multiples. Due to the effects of compounding and possible correlation errors, leveraged and inverse ETFs may experience greater losses than one would ordinarily expect. Compounding can also cause a widening differential between the performances of an ETF and its underlying index or benchmark, so that returns over periods longer than one day can differ in amount and direction from the target return of the same period. Consequently, these ETFs may experience losses even in situations where the underlying index or benchmark has performed as hoped. Aggressive investment techniques such as futures, forward contracts, swap agreements, derivatives and options can increase ETF volatility and decrease performance.

### Options

There are numerous risks associated with transactions in options on securities or securities indexes. A decision as to whether, when and how to use options involves the exercise of skill and judgment, and even a well-conceived transaction may be unsuccessful to some degree because of market behavior or unexpected events. In the case of index options, the client incurs basis risk between the performance of the underlying portfolio and the performance of the underlying index. For example, the underlying portfolio may decline in value while the underlying index may increase in value, resulting in a loss on the call option while the underlying portfolio declines as well.

### Alternative Investments

Alternative investments generally involve various risk factors and liquidity constraints, a complete discussion of which is set forth in the offering documents of each specific alternative investment, which will be provided to each prospective investor for review and consideration. Each investor will be required to complete a subscription agreement, pursuant to which the investor shall establish that they are qualified for investment in that alternative investment and acknowledges and accepts the various risk factors that are associated with such an investment.

## **8.6 Cash Management**

Cash and equivalents can be held in client accounts for defensive purposes or in preparation for client liquidity needs.

## **9. DISCIPLINARY HISTORY**

Neither FAM nor any of its supervised persons have any reportable disciplinary history.

## **10. OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS**

FAM is not involved in any business other than giving investment advice. As a fiduciary, FAM has certain legal obligations, including the obligation to act in clients' best interest. FAM maintains a Business Continuity and Succession Plan and seeks to avoid a disruption of services to clients in the event of an unforeseen loss of key personnel, due to disability or death. To that end, FAM has entered into a succession agreement with Atlas Private Wealth Management. FAM can provide additional information to any current or prospective client upon request to Timothy Low, President at 914-234-0281 or [tlow@forteassets.com](mailto:tlow@forteassets.com).

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

### **11.1 Code of Ethics**

FAM has adopted a Code of Ethics to prevent violations of federal securities laws. The Code of Ethics is predicated on the principle that FAM and its employees owe a fiduciary duty to its clients. Accordingly, FAM expects all employees to act with honesty, integrity, and professionalism and to adhere to federal securities laws. FAM and its employees are required to adhere to the Code of Ethics. At all times, FAM and its employees must (i) place client interests ahead of FAM's; (ii) engage in personal investing that is in full compliance with FAM's Code of Ethics; and (iii) avoid taking advantage of their position. Clients and prospective clients may request a copy of FAM's Code of Ethics by contacting Timothy Low, President of FAM, at 914-234-0281.

### **11.2 Prohibition on Use of Insider Information**

FAM has also adopted policies and procedures to prevent the misuse of "insider" information. A copy of FAM's Insider Trading policies and procedures is available to any client or prospective client upon request. For a copy of FAM's Insider Trading policies and procedures, please contact Timothy Low, President of FAM, at 914-234-0281.

### **11.3 Participation or Interest in Client Transactions**

As a principal, FAM does not buy securities for its own inventory nor sell securities it may own to any client. FAM may not affect transactions in which a client's securities are sold to or bought from brokerage customers. Principals and employees of FAM may buy or sell securities that are also recommended to clients. However, it is FAM's express policy that any person employed by FAM or a principal of FAM is prohibited from profiting at the expense of FAM's clients. FAM has established the following policies/restrictions in order to ensure its fiduciary responsibilities:

1. No person employed by FAM may purchase or sell any security being purchased or sold on the same day as any advisory account other than through a block trade with other clients through FAM's average price account (e.g. the price for security bought or sold will be the same for the FAM employee or principal and the client(s));

2. a principal or employee of FAM shall not buy or sell securities for their personal portfolio(s) where their decision is substantially derived, in whole or in part, by reason of his/her employment unless the information is also available to the investing public upon reasonable inquiry. No person of FAM shall prefer his/her own interest to that of the advisory client;
3. FAM emphasizes the unrestricted right of the client to decline to implement any advice rendered;
4. FAM requires that all employees must act in accordance with all applicable federal and state regulations governing registered investment advisory practices; and
5. Any employee not in observance of the above may be subject to termination.

## **12. BROKERAGE PRACTICES**

### **12.1 Best Execution**

Best execution has been defined by the SEC as the “execution of securities transactions for clients in such a manner that the client’s total cost or proceeds in each transaction is the most favorable under the circumstances.” The best execution responsibility applies to the circumstances of each particular transaction and an investment adviser must consider the full range and quality of a broker-dealer’s services, including, among other things, execution capability, commission rates, the value of any research, financial responsibility and responsiveness.

In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer’s services, including among others, the value of research provided, execution capability, commission rates, and responsiveness. Consistent with the foregoing, while FAM will seek competitive rates, it may not necessarily obtain the lowest possible commission rates for client transactions.

### **12.2 Broker Analysis**

FAM evaluates a wide range of criteria in seeking the most favorable price and market for the execution of transactions. These include the broker-dealer’s trading costs, efficiency of execution and error resolution, financial strength and stability, capability, positioning and distribution capabilities, information in regard to the availability of securities, trading patterns, statistical or factual information, opinion pertaining to trading and prior performance in serving FAM.

Also, in consideration is such broker-dealers’ provision or payment of the costs of research and other investment management-related services (the provisional payment of such costs by brokers are referred to as payment made by “soft dollars”, as further discussed in the “Research/Soft Dollars Benefits” section immediately below). Accordingly, if FAM determines in good faith that the amount of trading costs charged by a broker-dealer is reasonable in relation to the value of the brokerage and research or

investment management-related services provided by such broker, the client may pay trading costs to such broker in an amount greater than the amount another broker might charge.

FAM's portfolio manager is responsible for continuously monitoring and evaluation the performance and execution capabilities of brokers that transact orders for our client accounts to ensure consistent quality executions. In addition, FAM's periodically reviews its transaction costs in light of current market circumstances and other relevant information.

### **12.3 Research/Soft Dollar Benefits**

An investment adviser receives soft dollar benefits from a broker-dealer when the investment adviser receives research or other products and services in exchange for client securities transactions or maintaining an account balance with the broker-dealer.

FAM utilizes the services of Fidelity Institutional Wealth Services. While there is no direct linkage (except in certain circumstances) between the investment advice given to clients and FAM's participation in the Fidelity Institutional Wealth Services program, economic benefits are received by FAM which would not be received if we did not give investment advice to clients.

Although we don't allow directed brokerage, we may still receive benefits from program sponsors and product issuers. These benefits may be used for both research and non-research purposes and allows us to supplement, at no cost, our own research and analysis activities. These benefits include: a dedicated trade desk that services the program participants exclusively, a dedicated service group and an account services manager dedicated to FAM's accounts, access to a real-time order matching system, the ability to "block" clients' trades, electronic download of trades, balances and position information, duplicate and batched client statements, confirmations, year-end summaries, the ability to have advisory fees directly debited from client accounts (in accordance with federal and state requirements), availability of third-party research and technology, a quarterly newsletter.

The benefits received through participation in the Fidelity Institutional Wealth Services program do not depend upon the amount of transactions directed to or amount of assets managed through Fidelity Institutional Wealth Services.

Research obtained with soft dollars is not necessarily utilized for the specific account that generated the soft dollars. We do not attempt to allocate the relative costs or benefits of research among clients because we believe that, in the aggregate, the research we receive benefits all clients and assists us in fulfilling our overall duty to you.

These arrangements may be deemed to create a conflict of interest to the extent that we would have to pay for some or all of the research and/or services with "hard dollars" if we were unable to obtain the research and services in exchange for commissions in connection with client transactions. Client trades are always implemented based on the

goals and objectives of the client and not on any research, products or other incentives available.

## **12.4 Brokerage Selection**

If you elect to utilize our management services, you are required to establish a brokerage account at Fidelity Brokerage Services. Fidelity provides FAM with access to their institutional trading and custody services, which are typically not available to retail investors. The services from Fidelity include brokerage, custody, research and access to investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

Fidelity also makes available to FAM other products and services that we benefit from but may not benefit your accounts. Some of these other products and services assist us in managing and administering client accounts. These include software and other technology that:

- Provide access to client account data (such as trade confirmation and account statements)
- Facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts)
- Provide research, pricing information and other market data
- Facilitate payment of our fees from client accounts
- Assist with back-office functions, recordkeeping and client reporting.

Many of these services generally may be used to service all or a substantial number of our accounts. Fidelity also makes available other services intended to help us manage and further develop our business. These services may include:

- Consulting, publications and conferences on practice management
- Information technology
- Business succession
- Regulatory compliance
- Marketing.

In addition, Fidelity may make available, arrange and/or pay for these types of services rendered to FAM by independent third-parties providing these services to us. As a fiduciary, we endeavor to act in your best interest. Our requirement that you maintain your assets in accounts at Fidelity can be based in part on the benefit to us of the availability of some of the foregoing products and services and not solely on the nature, cost or quality of custody and brokerage services provided by Fidelity. This creates a conflict of interest.

You are under no obligation to act on our recommendations. You may select a broker/dealer or account custodian other than Fidelity, although in this case we cannot assist you with asset management services.

### Client Directed Brokerage

Clients should understand that not all investment advisors require the use of a particular broker/dealer or custodian. Some investment advisors allow their clients to select whichever broker/dealer the client decides. By requiring clients to use a particular broker/dealer, FAM may not achieve the most favorable execution of client transactions and the practice requiring the use of specific broker/dealers may cost clients more money than if the client used a different broker/dealer or custodian. However, for compliance and operational efficiencies, FAM has decided to require our clients to use broker/dealers and qualified custodians determined by FAM.

## **12.5 Trade Aggregation/Allocation**

### Investment Management Services

It is the objective of FAM to provide a means of allocating trading and investment opportunities between advisory clients on a fair and equitable basis and in compliance with all applicable state and federal guidelines. With respect to clients' accounts with substantially similar investment objectives and policies, FAM may often seek to purchase or sell a particular security in each account. FAM will aggregate orders only when such aggregation is consistent with FAM's duty to seek best execution and is consistent with the investment objective of each client. No client account will be unfairly favored over any other account.

Each client that participates in an aggregated order will participate based on the average execution price in that particular security. All securities purchased or sold, whether the order is filled completely or partially, will then be allocated pro rata based on the assets of each account.

## **12.6 Trade Errors**

Trade errors are promptly reported to the custodian and will be rectified by the custodian with no adverse financial effect on the client.

## **13. REVIEW OF ACCOUNTS**

### **13.1 Reviews**

Accounts will be reviewed by Timothy Low, FAM's portfolio manager. FAM reviews client accounts at least semi-annually. The review includes holdings, asset allocation, and comparisons to any relevant benchmarks and investment policies. Accounts are reviewed in the context of each client's investment objectives and guidelines, ensuring that the structure of the portfolio is coordinated with these objectives. More frequent reviews may be triggered by material changes in variables such as the client's individual circumstances, or the market, political or economic environment.

## 13.2 Reports

Clients will receive monthly statements directly from the custodian and quarterly performance reports from a third-party. Confirmation statements will be issued by the custodian for all trading activity.

## 14. CLIENT REFERRALS AND OTHER COMPENSATION

The only compensation received from advisory services is the fees charged for providing investment advisory services as described in *Item 5* of this Disclosure Brochure. FAM receives no other forms of compensation in connection with providing investment advice.

Please see *Item 12, Brokerage Practices*, for additional discussion concerning economic benefits received from Fidelity.

FAM does not retain solicitors to refer clients.

## 15. CUSTODY

FAM is given the authority from clients to deduct advisory fees directly from client accounts. Such authority is deemed to be custody as defined by the SEC. FAM is also deemed to have custody of client funds and securities when FAM has standing authority (also known as a standing letter of authorization or “SLOA”) to move money from a client’s account to a third-party account.

Pursuant to SEC Rule 206(4)-2, Fidelity has controls and forms in place that satisfy six of the seven no-action relief conditions. With respect to third party standing letters of authorization (“SLOA”) in which customer’s grant their designated registered investment adviser the limited authority to disburse funds to one or more third parties as specifically designated by the customer, Fidelity has reasonable policies and procedures in place which are designed to verify the customer’s instruction. Fidelity also provides a notice to the customer upon the setup of a SLOA, when funds are disbursed and an annual notice reconfirming the SLOA. A customer may modify or terminate the SLOA at any time. Also, the designated registered investment adviser has no authority or ability to change any of the information related to the third-party payee in the SLOA.

FAM has established procedures to ensure all client funds and securities are held at a qualified custodian, in a separate account for each client under that client’s name. Clients are also notified, in writing, of the qualified custodian’s name, address and the manner in which the funds or securities are maintained, promptly when the account is opened and following any changes.

Clients will receive directly from the custodian at least quarterly a statement showing all transactions occurring in the client’s account during the period covered by the account



statement, and the funds, securities and other property in the client's account at the end of the period. *Clients are urged to carefully review account statements sent by their broker-dealer/custodian and to compare the account statement provided by the broker-dealer/custodian with any statements provided by FAM.*

## **16. INVESTMENT DISCRETION**

For those client accounts over which FAM has discretion, FAM requests that it be provided with written authority (e.g., limited power of attorney contained in FAM's Investment Management Agreement) to determine the amounts of securities that are bought or sold. Any limitations on this discretionary authority shall be included in this written authority statement. Clients may change or amend these limitations as required. All such amendments shall be submitted in writing.

FAM generally has discretionary authority to make the following determinations without obtaining the consent of the client before the transactions are affected: (1) which securities are bought and sold for the account and (2) the total amount of securities to be bought and sold. FAM's authority in making investment related decisions may be limited by account guidelines, investment objectives and trading restrictions, as agreed between FAM and the client.

## **17. VOTING CLIENT SECURITIES**

### **17.1 Proxy Voting**

FAM does not vote proxies on behalf of its clients. Therefore, the client that maintains exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceeding or other type events pertaining to the client's investment assets. FAM and/or the client shall instruct each custodian of the assets to forward to the client copies of all proxies and shareholder communications relating to the client's investment assets. Clients can contact Timothy Low, President of FAM, at 914-234-0281 if they have questions regarding a particular solicitation.

### **17.2 Class Action Settlements**

Although FAM has discretion over client accounts, it will not be responsible for handling client claims in class action lawsuits or similar settlements involving securities owned by the client. Clients will receive the paperwork for such claims directly from their account custodians. Each client should verify with their custodian or other account administrator whether such claims are being made on the client's behalf by the custodian or if the client is expected to file such claims directly.

## **18. FINANCIAL INFORMATION**

## **Prepayment of Fees**

Because FAM does not require or accept prepayment of more than \$1,200 in fees six months or more in advance, FAM is not required to include a balance sheet with this disclosure brochure.

## **Financial Condition**

FAM has received a loan from Josiah O. Low III in order to assist with a buy-out agreement with a former FAM general partner. We are financially stable and will maintain sufficient capital to meet contractual commitments to clients. Firm capital accounts will be reviewed monthly to confirm adherence to such policy.

## **Bankruptcy**

FAM has never been the subject of a bankruptcy petition.

## **PRIVACY NOTICE**

FAM views protecting its customers' private information as a top priority and, pursuant to the requirements of the federal Gramm-Leach-Bliley Act, FAM has instituted policies and procedures to ensure that customer information is private and secure. FAM does not disclose any nonpublic personal information about its customers or former customers to any nonaffiliated third parties, except as permitted by law. In the course of servicing a client's account, FAM may share some information with its service providers, such as transfer agents, custodians, broker-dealers, accountants, and lawyers, etc. FAM restricts internal access to nonpublic personal information about the client to those persons who need access to that information in order to provide services to the client and to perform administrative functions for FAM. As emphasized above, it has always been and will always be FAM's policy never to sell information about current or former customers or their accounts to anyone. It is also FAM's policy not to share information unless required to process a transaction, at the request of a customer, or as required by law. For the full text of FAM's Privacy Notice, please contact Timothy Low, President of FAM, at 914-234-0281.

## **CLIENT COMPLAINTS**

Clients may contact Timothy Low, President of FAM, at 914-234-0281 to submit a complaint. Written complaints should be sent to Forté Asset Management, LLC, 476 Long Ridge Rd, Bedford, NY 10506.



# Forté Asset Management, LLC

476 Long Ridge Road  
Bedford, NY 10506  
914-234-0281

[www.forteassets.com](http://www.forteassets.com)

Form ADV Part 2B  
Brochure Supplement

Timothy I. Low  
CRD# 2319826

January 12, 2021

Part 2B of Form ADV – the “Brochure Supplement” – as required by the Investment Advisers Act of 1940 (the “**Advisers Act**”) provides additional information about Forté Asset Management, LLC’s (“**FAM**”) supervised persons who provide advisory services or have discretionary authority over your investments, including education/business experience, disciplinary history (if any), and other business activities.

This brochure supplement provides information about Timothy Low that supplements FAM’s Form ADV, Part 2A (brochure). Please contact Timothy Low at 914-234-0281 ([tlow@forteassets.com](mailto:tlow@forteassets.com)) if you have any questions about the contents of this Brochure supplement.

Additional information about Timothy Low is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). (Although Timothy Low conducts investment advisory business through FAM, please note that the SEC website does not indicate that Timothy Low is registered as an investment adviser representative of FAM. Unlike most other states, the State of New York does not provide the ability for an individual to register as an investment adviser representative which is the reason for the apparent discrepancy).

## **Item 2 – Educational Background and Business Experience**

Timothy Low  
Born: 1967

### *Educational Background:*

Hamilton College, Bachelor of Arts Degree: 1990

### *Business Background:*

Forté Asset Management, President and Chief Compliance Officer, 04/2005 to Present.

## **Item 3 – Disciplinary Information**

Timothy Low has no legal or disciplinary events to report.

## **Item 4 – Other Business Activities**

Timothy Low has no outside business activities to report.

## **Item 5 – Additional Compensation**

The only compensation received by Timothy Low and FAM is the fees charged for providing investment advisory services as described in *Item 5* of the ADV Part 2A Firm Brochure. FAM receives no other forms of compensation in connection with providing investment advice.

Timothy Low and FAM endeavor at all times to put the interest of its clients ahead of its own and will always act in the best interest of the client.

## **Item 6 – Supervision**

Timothy Low is the Chief Compliance Officer of FAM. He is responsible for overseeing and enforcing the firm's compliance programs that have been established to monitor and supervise the activities and services provided by the firm and its representatives. Timothy Low can be contacted at 914-234-0281.