

## ADV PART 2A

### ITEM 1 – COVER PAGE

#### **Cetera Investment Management LLC**

200 N. Pacific Coast Highway  
Suite 1200  
El Segundo, California 90245  
866.489.3100

January 4, 2021

This Brochure provides important information about Cetera Investment Management LLC. You should use this Brochure to understand the relationship between you, the Firm, and your investment adviser representative (Advisor). If you have any questions about the contents of this Brochure, please contact Jose Rodriguez, Chief Compliance Officer for Cetera Investment Management, at the address listed above or by calling 310.257.7880.

The Firm is registered with the Securities and Exchange Commission (SEC) as a registered investment adviser. Registration of an investment adviser does not imply any level of skill or training. The information in this brochure has not been approved nor verified by the SEC or by any state securities authority.

Additional information about the Firm is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) (select "investment adviser firm" and type in our name).

**Cetera<sup>®</sup> Investment  
Management LLC**

## ITEM 2 – MATERIAL CHANGES

### **Why are you providing me with this brochure?**

Item 2 will provide a summary of material changes, if any, the Firm has made to this brochure since the last annual update or the last material change.

### **Will I receive a brochure every year?**

We may, at any time, update this brochure. Any material changes will either be sent to you as a summary of those changes or, depending on the extent of these changes, you will receive the entire updated brochure.

### **May I request additional copies of the brochure?**

Absolutely. You may request and receive additional copies of this brochure by contacting the Advisor with whom you are working.

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## ITEM 4 – ADVISORY BUSINESS

Cetera Investment Management LLC (CIM) is a registered investment advisor that provides model portfolio services and market commentary services to its related broker-dealers and registered investment advisors.

CIM is wholly owned by Cetera Financial Group, Inc. Please refer to Item 10 of this brochure for more information on our corporate structure and affiliates.

### **Our Advisory Activities**

We are primarily engaged in the business of providing model portfolio services, strategist services, and market research. Our services are available primarily to related registered investment advisers (Related RIAs) and broker-dealers (Related BDs) (certain of our Related RIAs are also Related BDs), or investment advisers owned by representatives of related broker-dealers (ORIAS).

#### Related RIA Programs

##### MAA Platform

Certain of our Related RIAs have developed and co-sponsor investment advisory programs on the My Advice Architect Platform (MAA Platform). Within the MAA Platform, the Unified and Guided Programs (the “Programs”), among other investment program options, offers Related RIA clients asset allocation model investments based on a particular investment strategy and philosophy of an investment adviser (Strategist). We, as well as investment adviser firms not affiliated with or related to us, act as a Strategist in the Programs and provide the Programs with model portfolios of securities (Model Portfolios) consisting of select mutual funds and/or exchange traded funds (ETFs). We do not receive any compensation for providing this service nor do we act as an investment adviser to you. Our Related RIAs that co-sponsor the programs on the MAA Platform, and not us as Strategist, make the investment decisions for client accounts regarding the selection of a particular Strategist and Model Portfolio in the Programs. Envestnet Asset Management, Inc. (Envestnet), an independent investment adviser, also acts as a co-sponsor and investment adviser in the Program and has trading discretion in the Program.

As a Strategist, we provide the Programs with the following different sets of Model Portfolios (collectively the “CIM Portfolios”): tactical model portfolios of securities (Tactical Portfolios) and strategic model portfolios of securities (Strategic Portfolios).

#### Tactical Portfolios and Strategic Portfolios

Our strategies provide clients with the opportunity to participate in an asset allocation strategy using either a tactical model, a strategic model, or a combination of tactical and strategic models. The Program Sponsor will recommend a CIM Portfolio that is consistent with a client’s Asset Allocation Model, choosing from the applicable set of CIM Portfolios made available by us for the Program. Each Portfolio has a broad equity/fixed income asset allocation based on risk tolerance level.

The Strategic and Tactical Model Portfolios are based on certain key principles. First, we believe that diversified portfolios provide a prudent approach to achieving long-term investment goals. Second, we believe that many different investment strategies can be valuable if implemented in a consistent, disciplined manner. Finally, we believe that top quartile performance over a complete market cycle is achievable by outperforming blended benchmarks by 2% per annum, although there is no guarantee we will achieve our objective.

#### *Strategic Asset Allocation*

Strategic asset allocation is a portfolio strategy that involves the periodic rebalancing of the portfolio in order to maintain a long-term goal of a chosen asset allocation mix. The initial investments are chosen based on expected returns and risk tolerance. Because the value of the assets can change based on market conditions, the portfolio constantly needs to be re-adjusted to meet the policy. This is often called rebalancing, and may be done at regular intervals. This strategy does not purposely deviate from the original determined asset allocation percentages. The emphasis is on preserving this initial chosen asset allocation mix because the mix ultimately relates to a larger performance objective based on historical data.

## *Tactical Asset Allocation*

Tactical asset allocation is a portfolio strategy that involves the rebalancing of assets held in various categories in order to take advantage of market pricing anomalies or strong market sectors, as chosen by the portfolio managers. This strategy provides the opportunity to try and create extra value by taking advantage of these potential situations in the markets. It is a moderately active strategy and may use short-term trading methods. This investment philosophy is usually based on the belief that investor psychology and market forces can lead to periods of misvaluation. A tactical allocation process attempts to capture these misvaluations. It is not a fixed asset weight mix and the allocation and risk level of the portfolio may change quite dramatically.

## *Conflict of Interest in Model Portfolios with Strategic Partner Funds*

A conflict of interest exists in that our Related BDs are paid more revenue-sharing fees if you invest in a Model Portfolio, like the CIM Portfolios, that includes Strategic Partner funds or more Strategic Partner funds than a Model Portfolio offered by another or the same Strategist. For a more detailed description of the Related BDs Strategic Partner Program and a list of Strategic Partners as well as the conflicts of interest associated with the Strategic Partner Program, please refer to Cetera Advisory Services ADV Part 2A.

## *Investment Fiduciary Manager Program*

CIM provides investment advisory services to its Related RIAs that offer investment fiduciary advisory services to participant directed employer-sponsored plans that are subject to Section 3(38) of ERISA (Plans) in a program entitled the Investment Fiduciary Manager Program (Program). To support the Related RIA's Program, CIM's investment advisory services are limited to creating recommended investment lineups for each record keeper platform that the Related RIA makes available in the Program. The investment lineups developed and recommended by CIM are a subset of the available investments at certain platforms of record keepers that are also strategic partners (Retirement Partners) in the Related RIA's Retirement Strategic Partner Program. Prior to recommending the investment lineups, which are composed primarily of Strategic Partner (as opposed to Retirement Partner) funds, CIM reviews the appropriate selection and monitoring criteria. In addition to selecting and monitoring the investment lineups, CIM's process may include the addition, removal, and/or replacement of investment product(s) within a particular investment lineup, as needed. Under the Program, the Related RIAs, and not CIM, provide investment advisory services to the Plans. The Related RIAs determine whether to adopt the investment lineups recommended by CIM and the Plan grants the Related RIA the discretion to choose an investment lineup at a particular record keeper for that Plan. For a more detailed description of a Related RIA's Investment Fiduciary Manager Program, please refer to the applicable Related RIA's ADV Part 2A.

## *Information about Model Portfolio Services*

We do not maintain custody of your accounts. The firms that engage us to provide services on their behalf enter into relationships with qualified custodians. The majority of accounts that utilize our services result from our relationships with our Related RIAs or Related BDs.

CIM is not an ERISA Fiduciary because it:

- Does not provide individualized models,
- Does not contract directly with clients for services,
- Does not execute trades in clients' portfolio,
- Does not agree to assume fiduciary responsibility,
- Does not have control on whether its model is used in any specific client account, and
- Does not receive any fee or compensation directly from end clients who use the models.

We communicate with you primarily through your Advisor who registered with the Program Sponsor. We rely on that Advisor to analyze your goals and needs when implementing any CIM service. The Advisor will collect suitability information and ensure that the investment strategy chosen is appropriate for the client.

## *CIM Research Team & Reports*

CIM provides market research that is made available only to the broker-dealers and registered investment advisers related to Cetera Financial Group, Inc. and their Advisors. These materials include detailed market information as well as investment perspectives, asset allocation strategies, and investment ideas and recommendations. The research team provides Advisors with specific recommendations of mutual funds and Exchange Traded Products (includes both ETFs and exchange traded

notes) through a “Research Select List” as well as certain other internal lists. The CIM Research Team supports Advisors by giving them access to a large-scale body of research, including: (1) market perspectives, (2) economic insights, and (3) asset allocation recommendations.

### **Managed Wealth ADVANTAGE®**

CIM oversees the design and ongoing management of asset allocation models for the Managed Wealth ADVANTAGE (MWA) wrap-fee program offered by the Related RIAs. CIM also independently selects and adds or removes the mutual funds and/or exchange-traded funds that the Related RIAs will make available through MWA. CIM determines the investment allocation targets for client accounts under the MWA program. CIM does not receive any compensation for providing services to the MWA Program.

### **InvestPath Program**

We provide support to the InvestPath Program, an asset allocation strategy sponsored and managed by a Related RIA, Cetera Investment Advisers LLC (CIA), as described more fully in its Form ADV. This investment solution offered through partner financial institutions, uses mutual funds and ETFs to establish the portfolio allocations. Our approach offers five different risk tolerance-based models and within each model, provides a diversified portfolio with a strategic approach to portfolio construction. CIM is responsible for determining asset allocation and model portfolio construction, selecting, and monitoring the mutual funds and ETFs that are included in the InvestPath Program. CIA is ultimately responsible for overseeing CIM's performance.

### *Assets Under Management*

As of December 31, 2019, CIM does not have assets under management or assets under advisement.

## **ITEM 5 – FEES AND COMPENSATION**

### *Overview*

*CIM does not receive direct compensation for its services.*

### *Conflicts of Interest*

We offer our services to several firms; some are related to us while others are owned by Advisors of these related entities. Some of the firms that use our services may offer similar services under different program names. Our relationships with the various firms that we provide management services to enter into agreements with fund companies or product sponsors, such as mutual fund companies, to receive discounted fees or compensation. These savings will not affect a client's total advisory fee but may provide us with an incentive to work with fund companies or product sponsors that provide such discounts to us or an affiliate.

We may contribute financial support for client events to representatives of affiliates who offer the programs to which we provide investment management services. Providing this support presents a conflict of interest for these representatives, as they may have a financial incentive to induce clients to utilize our services.

## **ITEM 6 – PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT**

We do not participate in any programs that charge performance-based fees.

## **ITEM 7 – TYPES OF CLIENTS**

CIM provides services to other investment advisers, broker-dealers, and their clients. We do not contract directly with individual investors. Instead, we are hired by related firms to provide advisory services to be used with their clients. Our strategies are generally used as a foundation for another investment adviser's advisory programs.

## ITEM 8 – METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

CIM may use various methods of analysis and investment strategies to formulate our investment advice. We describe these methods and strategies in this section. Investing involves the potential risk of loss that investors should be prepared to bear.

To construct our Strategic and Tactical Model Portfolios, as well as portfolios in the InvestPath program, and to set strategic allocation guidelines in the MWA and Guided programs, we engage in a multi-step process. First, we establish strategic asset allocation weights for each investment objective/profile using methods such as mean variance optimization and mean reversion methodology. Mean variance optimization is a quantitative modeling process used to determine the optimal allocation of investments in different asset classes to maximize the trade-off between risk and return. With regard to investing, mean reversion is a theory that suggests that prices and returns eventually revert back to their long-term averages.

Next, we modify our strategic asset allocations to arrive at tactical asset allocation weights. We do this by considering near-term market perspectives and valuation, fundamentals, and momentum inputs and allocating to alternative strategies. Third, we choose mutual funds and construct final portfolios. Lastly, we monitor portfolios and underlying mutual funds.

To construct the Investment Fiduciary Manager Program's investment lineups, CIM reviews and analyzes across a number of stages, potential investment products against several sets of due diligence criteria. This process considers an agreed upon universe of investible asset classes, capital market assumptions, and forward-looking market scenarios, and the selections will be reviewed and analyzed regularly on at least a quarterly basis.

### *Types of Risk*

Various types of risk are involved when investing in securities. Economic risk, market risk, currency risk, inflation risk, interest-rate risk, liquidity risk, and credit risk are examples of the types of risks to which your account may be subject. If you are invested in one of our strategies, there is also the risk that your account value will decrease because of the investment decisions that we make. It is possible that our investment decisions will cause our strategies to underperform other investment strategies or the markets as a whole.

### *Assessing Risk*

While some types of risk can be mitigated by investment strategies, many of these risks cannot be eliminated completely. Your Advisor will work with you to make sure that you are comfortable with the risks associated with the type of investments that are in your account. It is important to make sure that you understand these risks.

### *Risk of Loss*

You should know that all types of securities investing involve risk. Your account value can both increase and decrease over time. You should not invest in any product if you are not prepared to bear a potential loss. Past performance does not guarantee future results.

### *Management Style*

Our management style is based on our attitude toward risk management. We seek to protect our client's investment and help it grow more effectively. Our goal is to lose less in a "down" market, but this typically means we will not gain as much in an "up" market. We believe that markets change over time. We actively research market movement and adjust our strategies accordingly. Active management is not about being invested or not. It is about playing offense and defense by selectively overweighting or under weighting certain asset classes. Our diverse strategies give you access to invest in a variety of asset classes. This approach allows us to change our weightings across industries as we see fit.

Our research process starts broadly. We use a combination of mathematical analysis and in-depth research to identify investment ideas. We have sophisticated tools that help us measure how our models compare with our outlook for the market.

### *Model Provider & Strategist*

When acting as a Strategist or model provider, we utilize either a strategic or tactical asset allocation.

Strategic asset allocation is a portfolio strategy that involves the periodic rebalancing of the portfolio in order to maintain a long-term goal of a chosen asset allocation mix. The initial investments are chosen based on expected returns and risk tolerance. Because the value of the assets can change based on market conditions, the portfolio constantly needs to be re-adjusted to meet the policy. This is often called rebalancing and may be done at regular intervals.

The Strategist does not purposely deviate from the original determined asset allocation percentages. The emphasis is on preserving this initial chosen asset allocation mix because the mix ultimately relates to a larger performance objective based on historical data.

Tactical asset allocation is a portfolio strategy that involves the rebalancing of assets held in various categories in order to take advantage of market pricing anomalies or strong market sectors, as chosen by the portfolio managers. This strategy allows the Strategist the opportunity to try and create extra value by taking advantage of these potential situations in the markets. It is a moderately active strategy and may use short-term trading methods.

The investment philosophy is usually based on the belief that investor psychology and market forces can lead to periods of misevaluation. A tactical allocation process attempts to capture these misevaluations. It is not a fixed asset weight mix and the allocation and risk level of the portfolio may change quite dramatically.

### **Research Team and Reports**

CIM provides market research that is made available to the broker-dealer and registered investment advisers related with Cetera Financial Group and their Advisors. These materials include detailed market information as well as investment perspectives, asset allocation strategies, and investment ideas and recommendations. The research team publishes specific recommendations of mutual funds and ETPs through a "Research Select List" and approved product lists for the MWA and Guided. CIM supports Advisors by giving them access to a large-scale body of research including: (1) market perspectives, (2) economic insights, and (3) asset allocation recommendations.

### **Mutual Fund Selection and Monitoring**

In selecting investment options for the portfolios, we seek to develop and maintain a broad universe of investment vehicles to provide flexibility and choice in asset allocation and portfolio construction. All investment vehicles in the portfolios will be subject to the same guideline criteria. Investment options may not meet all criteria at all times.

We use the same process to evaluate, retain and withdraw mutual fund selections. First, we engage in initial screening and a quantitative analysis. Next, we complete a qualitative analysis. Third, we consider timing factors. Lastly, we review our findings with our Investment Strategy Review Committee, as well as vote on and document the recommended changes. The Investment Strategy Review Committee is responsible for overseeing the Firm's specific investment strategy recommendations.

### **Ongoing Monitoring and Replacement**

The underlying mutual funds and overall portfolio is reviewed daily, quarterly and annually. A mutual fund may be removed from the portfolio if it no longer meets the basic criteria for inclusion or the original investment thesis is no longer met.

## **ITEM 9 – DISCIPLINARY INFORMATION**

The Firm has no disciplinary events to disclose.

## **ITEM 10 – OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS**

The Firm is part of Cetera Financial Group, Inc., which is wholly owned by Aretec. Aretec is a wholly-owned subsidiary of GC Two Intermediate Holdings, Inc., and an indirect wholly-owned subsidiary of GC Two Holdings, Inc. Cetera Financial Group, Inc. has a network of independent broker-dealers, investment advisers registered with the SEC, and general insurance agencies.



## ITEM 11 – CODE OF ETHICS

We are committed to providing brokerage services and/or investment advice with the utmost professionalism and integrity.

To help us avoid potential conflicts, we are subject to Cetera Financial Group's Code of Ethics, which is designed to protect our professional reputation and comply with federal or other applicable securities laws. Adherence to the Code of Ethics is a condition of employment or affiliation with the Firm. Our Code of Ethics may be summarized as follows:

### **Personal Investing by Firm Employees**

Our employees may purchase or sell the same security that they recommend to a client. This type of trading activity creates a conflict because an employee's transaction may receive a better price than your transaction. To help mitigate this potential conflict, we routinely review our employees' personal trading activity. Our Code of Ethics also places restrictions on personal trading activities. These restrictions include a prohibition on trading based on non-public information, pre-clearance requirements for certain personnel transactions with advance knowledge of model transactions, and a requirement that any personal securities transactions do not disadvantage clients or otherwise raise fiduciary or antifraud issues.

Also, employees may not purchase securities in an initial public offering or participate in a private placement without our written approval.

### **Personal Holdings and Transaction Reporting**

We receive information of the security transactions purchased and/or sold by our employees in their personal accounts. We also receive information listing all securities that they currently own in their personal securities accounts. Certain investments are not required to be reported to us by our employees, such as mutual funds holdings and securities issued by the Government of the United States.

You may request a copy of our Code of Ethics at any time by contacting Jose Rodriguez, Chief Compliance Officer for Cetera Investment Management, by calling 310.257.7880.

## ITEM 12 – BROKERAGE PRACTICES

### *Soft Dollar Benefits*

Some firms in the industry receive benefits in exchange for delivering business to a broker-dealer or other third party. These benefits are known as "soft dollars." Soft dollar benefits are generally defined as benefits (besides normal fees) received from a firm in exchange for doing business with the Firm. These benefits may include access to software, hardware, research, and/or office space. We do not currently receive any soft dollar benefits for choosing the broker-dealer.

### *Directed Brokerage*

We do not permit clients to direct us to execute transactions through a specified broker-dealer other than a Related Broker-Dealer. We rely on the relationship established by our related entities to determine where we execute our transaction. We believe that the Related BD allows us to achieve best execution because of their business relationships with clearing firms, our access to the broker-dealer's trading department, financial stability, and overall service. Best execution factors include timeliness of execution, trader expertise, better pricing, and responsiveness.

## ITEM 13 – REVIEW OF ACCOUNTS

Our investment philosophy rests on the idea of an active management style. This means that we want to adjust our strategies to be in alignment with changing market conditions. We review our investment strategies throughout each business day to make sure they are in line with our outlook.

Members of the Firm's investment team typically communicate daily to review any beneficial change in portfolio allocations. Members of the Firm's Investment Strategy Review Committee typically meet at least biweekly to review macro-economic trends, asset class preferences, and thematic tilts.

Client communication and reports are provided by the program sponsor.

## ITEM 14 – CLIENT REFERRALS AND OTHER COMPENSATION

All of our clients are firms, not individuals. These firms contract with the Advisors that service your account. We, and our Related firms, may receive payments from product sponsors, including mutual fund companies. If a Related BD receives payments from product sponsors for securities we manage, we may receive software, training, and conference support, based on the volume of securities we invest with the product sponsor. The Advisor who services your account may provide you with more specific information about revenue sharing arrangements with the program sponsor.

## ITEM 15 – CUSTODY

We do not have physical or constructive custody for any client funds. Account assets are custodied by an approved custodian selected by the program sponsor. The custodian of your account will send your account statements. These statements will be sent to you either quarterly or more frequently. You should review the account statements carefully and compare these account statements with the reports that may be sent to you by the program sponsor. Should you note any discrepancies, please contact your Advisor.

## ITEM 16 – INVESTMENT DISCRETION

We do not have discretion over your assets. We will not remove funds or securities from your account.

## ITEM 17 – VOTING CLIENT SECURITIES (I.E., PROXY VOTING)

CIM does not vote proxies on behalf of clients.

## ITEM 18 – FINANCIAL INFORMATION

We do not take prepayment of more than \$1,200 in fees, six months or more in advance or have a financial condition that could impair our ability to meet our contractual obligations. Therefore, we are not required to provide our audited balance sheets.

FORM ADV PART 2B  
BROCHURE SUPPLEMENT

**Cetera Investment Management LLC**

200 North Pacific Coast Highway  
Suite 1200  
El Segundo, California 90245  
866.489.3100

January 4, 2021

This brochure supplement provides information about the five members of the Cetera Investment Management (Firm) investment team with the most significant responsibility for the day-to-day discretionary advice provided to the client. This brochure supplements the Firm's Form ADV Part 2A (disclosure brochure), which you should have already received. Please contact your advisor if you did not receive the disclosure brochure or if you have any questions about the contents of this supplement.

Additional information about the Supervised Persons listed below are available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov):

Gene Goldman, Hristo Stefanov, Brian Klimke and Richard Anderson

The Investment Strategy Review Committee is responsible for overseeing the Firm's specific investment strategy recommendations and includes: Gene Goldman, Hristo Stefanov, Brian Klimke.

Their business address is 200 North Pacific Coast Highway, Suite 1200, El Segundo, CA 90245 and telephone number is 866.489.3100.

**Cetera<sup>®</sup> Investment  
Management LLC**

## ITEM 1 – EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

The qualifications required for each professional designation and securities registration examination listed below, are provided in the Appendix of this supplement.

### **Gene Goldman**

#### *Educational Background*

Gene Goldman was born in 1970. Mr. Goldman attended Northeastern University and graduated with an MBA, Finance Concentration in 1994. Previously, he attended Worcester Polytechnic Institute and graduated with a Bachelor of Science degree in Engineering in 1992.

#### *Professional Designations*

Mr. Goldman holds a Chartered Financial Analyst (CFA®) designation. He also holds the Series 7 and 63 securities registrations.

#### *Business Experience*

- 2017–Present Cetera Investment Management, Chief Investment Officer & Director of Research
- 2015–2017 Tower Square Investment Management, Director of Research & Co-Chief Investment Officer
- 2011–2015 Vice President, Head of Research, Cetera Investment Management
- 1996–2011 Vice President, LPL Financial

Mr. Goldman serves as the Cetera Investment Management team's president and chief investment officer and is responsible for the strategic direction and continued growth of the Firm's research offerings. The team provides superior research capabilities and enables the delivery of objective investment advice for both advisors and their clients. His role includes setting the vision for superior research capabilities and enabling the delivery of objective investment advice. As chief investment officer, Mr. Goldman oversees the Investment team at CIM and their commitment to delivering thought leadership on the economy, financial markets and investment strategies, as well as implementation and practice recommendations for advisors.

### **Brian Klimke**

#### *Educational Background*

Brian Klimke was born in 1975. Mr. Klimke attended University of Wisconsin – Madison and graduated with a Bachelor of Business Administration in Finance in 1998.

#### *Professional Designations*

Mr. Klimke currently holds the CFA designation.

#### *Business Experience*

- 2013–Present Cetera Investment Management, Investment Director
- 2015–2017 Tower Square Investment Management, Investment Director
- 2013–2015 Cetera Investment Management, Investment Research Director
- 2003–2013 Transamerica Financial Advisors, Director, Investment Research

Mr. Klimke has more than 15 years of experience in investment oversight, monitoring, and investment platform positioning. Before joining Cetera, he served as director of investment research at Transamerica, where he played an integral role in the development of the Transamerica Financial Advisors' asset allocation models and proprietary ETF portfolios known as the Transamerica I-Series® Portfolios. He has worked in the financial services industry since 1999. He also holds FINRA Series 7, 24, 27, 63 and 87 registrations.

### **Hristo Stefanov**

#### *Educational Background*

Hristo Stefanov was born in 1974. Mr. Stefanov attended the American University in Bulgaria and graduated in 1997 with a Bachelor of Science in Applied Economics. He also attended University of California – Riverside, graduating in 1999 with a Bachelor of Arts, Finance Concentration.

#### *Professional Designations*

Mr. Stefanov currently holds the CFA, the Chartered Alternative Investment Analyst (CAIA®), and Certificate in Investment Performance Measurement™ (CIPM®) designations. He also holds FINRA Series 7 and 63 registrations.

#### *Business Experience*

- 2017–Present Cetera Investment Management, Investment Director
- 2015–2017 Tower Square Management, Investment Director
- 2013–2015 Cetera Investment Management, Investment Research Director
- 2012–2012 SunAmerica Retirement Markets, Investment Analyst

Mr. Stefanov has more than 12 years of experience in investment oversight, manager selection and monitoring, and investment platform positioning. Before joining Cetera, he served as manager research analyst at SunAmerica Retirement Markets, where he helped in the research of new manager additions as well as in the attribution and evaluation of a broad platform of existing mutual fund managers. Prior to that, he served as vice president of product development at Transamerica Retirement Services, where he directed the investment platform strategy, including manager selection, ongoing monitoring and oversight of a mutual fund platform consisting of more than 200 investment strategies.

## **Richard Anderson**

### *Educational Background*

Richard Anderson was born in 1959. He attended St. Cloud University and graduated in 1984 with a Bachelor's of Science in Finance.

### *Business Experience*

- 2017–Present Cetera Investment Management, Investment Director
- 2015–2017 Tower Square Investment Management, Investment Director
- 2013–2015 Cetera Investment Management, Investment Director

Mr. Anderson founded the Equity Research department of Cetera Financial Group/PrimeVest Financial Services, Inc. in 1998, forging an alliance with Credit Suisse, a leading global financial services company. He has more than a decade of equity research experience and more than 20 years of Wall Street trading experience. Mr. Anderson joined PrimeVest in 1984 as the Firm's first trader and founded the Trading department, executing its first securities transaction. Then he formed, managed and grew the fixed income and equity trading desks, serving as the Firm's primary securities principal. He also served as PrimeVest's vice president in Trading until 1998. He holds his Series 4, 7, 24, 53, and 63 securities registrations.

## **ITEM 2 – DISCIPLINARY INFORMATION**

There are no disciplinary events to disclose about the members of CIM's investment team listed above.

## **ITEM 3 – OUTSIDE BUSINESS ACTIVITIES**

In addition to their responsibilities as members of the investment team at CIM, and, as applicable, members of the Investment Strategy Review Group, some of these individuals are registered with FINRA as registered representatives of our related broker-dealers. Some of these members of the investment team are also executive officers or directors of the Firm or its affiliates. Best efforts are made to limit any potential conflicts of interests caused by these additional roles. For example, members of the investment team limit discussions to investment topics related to providing fiduciary advisory services to clients and considers clients' best interests when reaching investment decisions.

## **ITEM 4 – ADDITIONAL COMPENSATION**

None of the members of the investment team receive any additional economic benefit for providing advisory services.

## **ITEM 5 – SUPERVISION**

The five members of the investment team with the most significant responsibility for the day-to-day discretionary advice provided to the client are supervised by their respective managers who meet regularly with them. These managers can be reached by dialing the phone number listed on the cover.

<b>Member</b>	<b>Supervisor</b>
Gene Goldman*	Sheila Woelfel, Head of Portfolio Solutions, Cetera Financial Group
Brian Klimke*	Gene Goldman, Chief Investment Officer & Director of Research, Cetera Investment Management
Hristo Stefanov*	Gene Goldman, Chief Investment Officer & Director of Research, Cetera Investment Management
Richard Anderson	Brian Klimke, Investment Director, Cetera Investment Management

\*Indicates those individuals who are also a member of the Investment Strategy Review Committee.

## APPENDIX

Series 4 – The Registered Options Principal exam (Series 4) is required of an individual who will function as a registered options principal, compliance registered options principal, or senior registered options principal. The Series 4 tests the individual's knowledge of options trading, exchange rules, and regulations applicable to the trading of options contracts, as well as the rules of the options clearing corporation.

Series 7 – The General Securities Representative exam (Series 7) qualifies a holder for the solicitation, purchase, and/or sale of all securities products, including corporate securities, municipal securities, municipal fund securities, options, direct participation programs, investment company products, and variable contracts.

Series 24 – The General Securities Principal exam (Series 24) qualifies individuals as general securities principals who can manage or supervise the member's (broker-dealer firm's) investment banking or securities business for corporate securities, direct participation programs, and investment company products/variable contracts.

Series 27 – The Financial and Operations Principal Qualification exam (Series 27) measures the degree to which each candidate possesses the knowledge and understanding of the financial responsibilities, rules and recordkeeping requirements of broker-dealers.

Series 53 – The Municipal Securities Principal Qualification exam (Series 53) qualifies individuals to manage, direct or supervise the municipal securities activities of a securities firm or bank dealer.

Series 63 – The Uniform Securities Agent State Law exam (Series 63) qualifies holders as securities agents. The examination covers the principles of state securities regulation reflected in the Uniform Securities Act.

Series 66 – The Uniform Combined State Law exam (Series 66) qualifies holders as both securities agents and investment adviser representatives. The Series 7 is a co-requisite exam that needs to be successfully completed in addition to the Series 66 exam before a holder can register with a state.

Series 86/87 – The Research Analyst exam (Series 86/87) measures the degree to which each candidate possesses the knowledge needed to perform the critical functions of a research analyst, including preparing of written or electronic communications that analyze equity securities and/or companies and industry sectors.

CFA® – The CFA designation is issued by CFA Institute (formerly the Association for Investment Management and Research [AIMR]) after successfully completing 250 hours of self-study and passing three course exams. As a prerequisite, candidates must either have an undergraduate degree and four years of professional experience involving investment decision-making, or a combination of university experience and professional experience, not necessarily investment related, that totals four years. In order to pass these examinations, candidates must demonstrate their competence, integrity and extensive knowledge in accounting, ethical and professional standards, economics, portfolio management and security analysis.

CIMA® - The CIMA designation is obtained by completing approximately 5 months of self study and a 1 week classroom program provided by an AACSB accredited university business school, an online exam and an in class certification exam. As a prerequisite the IAR must have 3 years of verifiable financial services experience and answer "no" to all disclosure questions on Form U-4 that cover criminal and regulatory violations, civil judicial actions and customer complaints or satisfactorily justify a "yes" answer. This designation requires 40 hours of continuing education every 2 years. He also holds the Series 7 and 66 securities registrations.

CAIA® – The CAIA designation is granted by the Chartered Alternative Investment Analyst Association to candidates who have completed Level I and Level II examinations. CAIA is the globally-recognized credential for professionals managing, analyzing, distributing, or regulating alternative investments.

CIPM® – The CIPM is an international professional accreditation in the field of investment performance analysis. It includes investment performance measurement and attribution. It is offered by the CIPM Association, a body associated with the CFA Institute.