

David A. Hammer, Jr.

Hammer Asset Management, LLC

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This brochure supplement provides information about David Hammer, Jr. that supplements the Hammer Asset Management, LLC brochure. You should have received a copy of that brochure. Please contact Cindy Quiggin if you did not receive Hammer Asset Management, LLC's brochure or if you have any questions about the contents of this supplement.

Educational Background and Business Experience

David Hammer, Jr. (b. 1975)

Education

B.S. in Economics/Finance, *Southern New Hampshire University*, 2013
FINRA Series 65, 2012

Business Background (past 5 years)

Hammer Asset Management, LLC (1998 – present): Chief Executive Officer,
Portfolio Manager/Trader

Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

Other Business Activities

No information is applicable to this Item.

Additional Compensation

No information is applicable to this Item.

Supervision

As CEO of Hammer Asset Management, LLC, David A. Hammer, Jr. is primarily responsible for supervision of Hammer Asset Management, LLC. He can be reached at (530) 888-0999.

Hammer Asset Management, LLC has adopted a Code of Ethics/Policies and Procedures manual for all supervised persons of the firm describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics/Policies and Procedures manual includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at Hammer Asset Management, LLC must acknowledge the terms of the Code of Ethics/Policies and Procedures manual annually, or as amended.

The Code of Ethics/Policies and Procedures manual is designed to assure that the personal securities transactions, activities, and interests of the employees of Hammer Asset Management, LLC will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. The Code requires manager's approval of transactions and restricts trading in close proximity to client trading activity. Nonetheless, because the Code of Ethics permits employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee. Employee trading is continually monitored under the Code of Ethics, and to reasonably prevent conflicts of interest between Hammer Asset Management, LLC and its clients.

David Hammer, Jr. reviews every account at least weekly for compliance with policy regarding asset allocation, sector positioning, and individual weightings. Changes in client's circumstances, asset allocation guidelines, and individual company fundamentals trigger special reviews.

In addition to monthly reports from the custodian, Hammer Asset Management, LLC provides to clients, on a quarterly basis, a detailed appraisal report of client's holdings and a performance report showing the clients periodic return compared to the appropriate indices.

* Hammer Asset Management, LLC's clients or prospective clients may request a copy of the firm's Code of Ethics/Policies and Procedures manual by contacting the Compliance Officer, Cindy Quiggin, at (530) 888-0999 or email at Cindy@hammerasset.com