

Item 1 – Cover Page

1271787 LLC

Form ADV Part 2A – Disclosure Brochure

March 21, 2022

This Disclosure Brochure provides information about the qualifications and business practices of 1271787 LLC. If you have any questions about the contents of this Disclosure Brochure, please contact us at (646) 732-5945.

1271787 is registered as an investment advisor with the U.S. Securities and Exchange Commission (“SEC”). The information in this Disclosure Brochure has not been approved or verified by the SEC or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information about us to assist you in determining whether to retain us.

Additional information about 1271787 LLC and its advisory personnel is available on the SEC’s website at www.adviserinfo.sec.gov.

1271787 LLC
CRD No:
228 Cedar Street
Corning, NY 14830
Phone: (646) 732-5945
www.1271787.com

Item 2 – Material Changes

Form ADV (Part 2) is designed to provide clients with clearly written and meaningful disclosure, in plain English, about the advisor's business practices, conflicts of interest and advisory personnel. Form ADV 2 is divided into two parts: *Part 2A* and *Part 2B*.

Part 2A (this "Disclosure Brochure") provides information about a variety of topics relating to an advisor's business practices and conflicts of interest. *Part 2B* (the "Brochure Supplement") provides information about our advisory personnel.

We believe communication and transparency are the foundation of our relationship and continually strive to provide our clients with the complete and accurate information at all times. We encourage all current and prospective clients to read this Disclosure Brochure and discuss any questions you may have with us.

Initial Filing

1271787 LLC is a newly-registered investment advisor. This is the initial filing of our Disclosure Brochure.

Future Changes

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to each client annually and if a material change occurs in our business practices.

At any time, you may view the current Disclosure Brochure on-line at the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

You also may request a copy of this Disclosure Brochure at any time, by contacting us at the telephone number on the cover page hereof.

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FORM ADV Part 2B

Barber, Andrew D.
King, Adam

Privacy Policy

Item 4 – Advisory Services

A. Firm Information

1271787 LLC (the “Company”) is organized as a limited liability company (LLC) under the laws of the State of Delaware. The Company was founded in 2021 and is owned and operated by Adam King and Andrew D. Barber.

B. Advisory Services Offered—Individual Managed Accounts

1271787 LLC provides customized investment advisory solutions for institutional and high net worth individual clients based on the core investment philosophy described below in this Item. We work with each client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to determine if the client’s objectives align with the portfolio management strategies we offer. We then construct a portfolio, consistent with their investment philosophy.

The Company will provide investment advisory services and portfolio management services. At no time will we accept or maintain custody of a client’s funds or securities. All client assets will be with a qualified custodian pursuant to a client investment advisory agreement.

Investment Strategy

1271787 LLC is an allocation research and advisory firm focused on capturing absolute returns across the full spectrum of liquid asset classes.

We work to understand the forces driving the financial markets, guided by a disciplined analytical process and core beliefs acquired through real world experience. We believe that in order to consistently outperform, it is necessary to recognize paradigm shifts and to apply the right tools to the prevailing market environment. While we strive for absolute performance, we also know that no magic formulas exist. Markets change, and so must any successful investment philosophy.

Although we are often contrarian in our views, we recognize that mis-pricings exist and may persist for extended periods of time; market participants can and do make irrational decisions. We respect the power that sentiment and money flows have over markets, which expresses itself through the tactical elements of price action and market structure.

We also know that superior investment performance is not achievable without accepting risk; risk is an ever-present companion of opportunity. Our first and most important mandate is always risk management—our job is to assume the correct risks at the correct time, and to manage those risks appropriately.

Finally, we believe that objectivity and humility are a necessary part of any effective investment process. Though much is known and quantified, successful investors must always work on the edge of what is knowable. Intellectual flexibility combined with continuous risk management discipline is essential to long-term success. What we do is straightforward: We work hard every day to face risk objectively, and to seize opportunity when it appears.

Investment Research

Our research blends four primary disciplines: quantitative analysis, macroeconomic analysis, fundamental analysis and derivatives acumen.

Quantitative Analysis

Our quantitative research represents a fusion of the best elements of statistically-driven pattern analysis, behavioral finance, and a relative value approach that seeks to understand the allocation decisions of large market participants. Our research process covers an array of markets and environments. We seek to understand that markets exist in varying regimes; the tools that are useful in one paradigm may be exactly the wrong tools to apply in another. Our tactical/quantitative process represents a significant departure from traditional technical analysis: it incorporates a statistical approach with a regime shift model and an element of human discretion, all under the aegis of a disciplined risk management system.

Macroeconomic Analysis

Our macroeconomic analysis process focuses on discovering inflections that may represent developing shifts in long-term trends; this work is an invaluable input in an investment process that seeks to understand market action from many perspectives. We do not believe that economic analysis can be used to predict market movements successfully over shorter time frames, and focus instead on the impact of money flows and behavioral psychology as a risk management tool.

Fundamental Analysis

We employ a top-down fundamental approach across full market segments; whether focused on a portion of the industrial commodity complex, a specific equity sector or a relative value spread in the bond market our approach remains the same: we focus on the known fundamental factors to aid our risk perspective, allow tactical considerations to dictate timing and risk management decisions.

Derivatives

Our team brings real world experience managing risk across multiple asset-classes, strategies, and time frames. Our expertise in portfolio structure, quantitative, fundamental and macroeconomic analysis is designed to assist us in understanding how derivatives can and should be deployed inside the context of an overall portfolio process.

C. Client Account Management

Prior to engaging our Company to provide investment advisory services, each client is required to enter into an investment advisory agreement that defines the terms, conditions, authority and responsibilities of 1271787 LLC and the client. These services may include:

Establishing an Investment Policy Statement – In conjunction with the client, we generally develop a statement that summarizes the client's investment goals and objectives along with the broad strategy[ies] to be employed to meet the objectives.

Portfolio Construction – We develop a portfolio for the client that is intended to meet the stated goals and objectives of the client.

Investment Management and Supervision – We provide investment management and ongoing oversight of the client’s portfolio and overall account.

D. Wrap Fee Programs

We do not manage or place client assets into a wrap fee program.

E. Assets Under Management

1271787 LLC is a newly-registered investment advisor. Assets under management will be reported following the Advisor’s December 31, 2022 fiscal year end. Clients may request more current information at any time by contacting us.

Item 5 – Fees and Compensation

A. Fees for Advisory Services

The clients for whom we provide advisory services generally pay different types of fees.

Individual and institutional separate account clients generally pay a quarterly asset-based management fee (“Management Fee”) and in a limited number of cases, a combination of asset-based management fees and performance fees. Both fees are negotiable in our discretion, taking into account the assets under management and the client’s investment objective(s), among other variables.

For more information on performance-based fees, see Item 6: Performance-based Fees and Side-by-Side Management.

B. Fee Billing

Management Fees are generally paid quarterly pursuant to the terms of a written investment advisory agreement. Management Fees are based on the market value of assets under management at the end of each calendar quarter and are charged at an annual rate that ranges from .5% to 3.0% in our discretion. The actual rate depends on certain variables—primarily the size of the account (i.e., assets under management).

Performance fees are generally paid quarterly or annually. Performance fees are based on a percentage rate which is separately negotiated with each “qualified client” in our discretion. The term “qualified client,” is defined in Item 6: Performance-based Fees and Side-by-Side Management.

Clients may elect to pay our fees directly or give us written authorization permitting fees to be paid directly from their accounts held by the custodian as part of the advisory agreement and separate account forms provided by the custodian. In all cases, we send an invoice, either to the client or to the custodian, indicating the amount of the fees to be deducted from the client account on the payment date. In the case of Management Fees, the amount due is calculated by applying the quarterly rate (annual rate divided by 4) to the total assets under management at the end of each quarter. Performance fees are calculated as set forth in Item 6: Performance-based Fees and Side-by-Side Management

Clients who authorize us to receive fees directly from their accounts held by the custodian receive a statement, at least quarterly, from the custodian showing the deduction of our fee. It is the responsibility of the client to verify the accuracy of the fees shown on the custodian's statement as the custodian does not assume this responsibility.

C. Other Fees and Expenses

Clients may incur certain fees or charges imposed by third parties. Among other things, the client pays all custodial and securities execution fees charged by the custodian and executing broker-dealers. Our fee(s) are separate and distinct from these custodian and execution fees.

In addition, all fees paid to us for investment advisory services are separate and distinct from the expenses charged by mutual funds and exchange-traded funds to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. They generally are used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A client could invest in these products directly, without the services of our Company, but would not receive the services provided by us which are designed, among other things, to assist the client in determining which products or services are most appropriate to each client's financial situation and objectives. Accordingly, the client should review both the fees charged by the fund[s] and the fees charged by 1271787 LLC to fully understand the total fees to be paid.

D. Advance Payment of Fees and Termination

In most cases, we are compensated for our services in advance at the beginning of each calendar quarter. Clients may request to terminate their investment advisory agreement with us, in whole or in part, by providing advance written notice. The client shall be responsible for fees up to and including the effective date of termination. The investment advisory agreement is non-transferable by us without your written approval.

E. Compensation for Sales of Securities

1271787 LLC does not receive any compensation for securities transactions in any client account, other than the advisory fees discussed in this Disclosure Brochure.

Item 6 – Performance-Based Fees and Side-By-Side Management

In some cases, we may receive a performance fee based upon gains, if any, obtained in the individual managed accounts of "Qualified Clients." **Only** Qualified Clients as defined below may be charged a Performance Fee.

Who is a "Qualified client"?

The Investment Advisers Act of 1940 (the "Advisers Act"), Rule 205-3(d)(1) defines a "Qualified client" as one who is financially sophisticated and meets one or more of the following financial requirements:

1. client is a natural person who or a company that immediately after entering into the contract has at least \$1,100,000 under our management; or
-

2. client is a natural person who or a company that immediately prior to entering into the contract, has a net worth (together, in the case of a natural person, with assets held jointly with a spouse) (excluding his/her principal residence)) of more than \$2,200,000 at the time the contract is entered into.

Performance fees for individual managed accounts are calculated quarterly or annually in arrears and generally deducted from client accounts directly by the custodian.

Performance fee arrangements may create an incentive for us to make investments which may be riskier or more speculative than those which would be made under a different fee arrangement.

The receipt of a performance fee from certain clients may result in a potential conflict of interest, where we have the potential for higher compensation from a client.

Side-by-Side Management

At present, we do not manage side-by-side accounts. Side-by-side management refers to the practice of managing accounts that are charged performance-based fees while at the same time managing accounts that are not charged performance-based fees. Before instituting a performance-based fee product in the future, we would undertake to develop policies to properly manage the potential conflicts of interest that inevitably arise from time to time. Our goal is that our advice to each client remains at all times in each client's best interest, disregarding any impact of the advice on us.

Item 7 – Types of Clients

We offer investment advisory services to high net worth individuals and institutions. 1271787 LLC generally requires a minimum account size of \$100,000,000 to establish an advisory relationship for individual managed account(s).

Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss

A. Methods of Analysis

As more fully set forth in Item 4 above, we utilize a combination of macroeconomic, quantitative and fundamental analysis as part of our investment selection criteria. While these types of analysis are intended to help us evaluate and select potential investments, we acknowledge that no amount of analysis can guarantee that the investment will increase in value. We continuously monitor economic indicators and other information and factors to determine if adjustments to our investment selections are appropriate. More detail on our review processes is included in Item 13.

B. Risk of Loss

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. Although we endeavor to assist

clients in determining if their investment strategy is appropriate based on their tolerance for risk and other factors noted above, there can be no assurance that a client will meet its investment goals.

Some of the risks of our investment approach include:

In General. Investments in securities entail general investment risks that all investors face. Securities prices are influenced by many unpredictable factors and we will be competing for investment opportunities with other investors, many of which have greater investment research and other resources than us. We believe that our investment strategies and research techniques will moderate risk through careful securities selection. However, risk cannot be eliminated. No guarantee or representation is made that our investment programs or approach will be successful or that any particular investment objectives will be achieved.

No Assurances. Identifying and participating in attractive investment opportunities is difficult. There is no assurance that the Fund's investments will be profitable. Portfolio investments may have substantial variations in operating results from period to period, face intense competition, and experience failures or substantial declines in value at any stage. They may need substantial additional capital to support growth or to achieve or maintain a competitive position. Such capital may not be available on attractive terms. The public market for attractive investments is extremely volatile. Such volatility may adversely affect the Fund's profitability. In most cases, investments will be long term in nature and may require years from the date of initial investment before disposition.

Volatility. The investments we make are subject to the risks of market volatility. Such market volatility may be caused by, among other things, unpredictable domestic and international economic and political events that, in turn, may cause reductions in the value of such investments.

There are risks associated with all investments. Prospective clients should carefully consider the risks involved in any investment, including but not limited to those discussed above, and should consult with independent qualified sources of investment, legal and tax advice. Investments in equity securities are speculative in nature and suitable only for sophisticated investors who are aware of, and understand, the risks.

Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each client should understand and be willing to bear. Clients are reminded to discuss these risks with us. For more information on our investment management services, please contact us.

Item 9 – Disciplinary Information

There are no legal, regulatory or disciplinary events involving 1271787 LLC or any of its advisory personnel.

1271787 LLC and its advisory personnel value the trust you place in us. As we advise all clients, we encourage you to perform the requisite due diligence on any advisor or service provider with which you partner.

Item 10 – Other Financial Industry Activities and Affiliations

Our sole business is to provide investment advisory services to our clients. We do not maintain any affiliations with other firms, other than contracted service providers to assist with the servicing of its client's accounts.

Item 11 – Code of Ethics, Participation or Interest in client Transactions and Personal Trading

A. Code of Ethics

1271787 LLC has implemented a Code of Ethics that defines our fiduciary commitment to each client. This Code of Ethics applies to all persons associated with us. The Code of Ethics contains general ethical guidelines and specific instructions regarding our duties to you, our client. It is the obligation of our personnel to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code of Ethics covers a range of topics that may include; general ethical principles, reporting personal securities trading, reportable securities, initial public offerings and private placements, reporting ethical violations, distribution of the Code of Ethics, review and enforcement processes, amendments to Form ADV and supervisory procedures. 1271787 LLC has written its Code of Ethics to meet and exceed regulatory standards. To request a copy of our Code of Ethics, please contact us.

B. Personal Trading with Material Interest

Our employees may purchase or sell the same securities that we recommend to and purchased on behalf of clients. We do not act as principal in any transactions. We do not have a material interest in any securities traded in client accounts.

C. Personal Trading in Same Securities as Clients

Our personnel and other clients may have positions in the same securities that are purchased or sold for clients. Owning the same securities we recommend (purchase or sell) to you presents a potential conflict of interest that, as fiduciaries, we must disclose to you and mitigate through policies and procedures. Our Code of Ethics addresses insider trading (material non-public information controls) and personal securities reporting procedures. We have also adopted written policies and procedures to detect the misuse of material, non-public information.

D. Personal Trading at Same Time as client

Our employees may purchase or sell the same securities that may be recommended to and purchased on behalf of clients. However, these trades do not occur at the same time. Advisory personnel can place trades for ourselves only after client orders have been placed and filled. At no time will our Company or any associated person of our Company transact in any security to the detriment of any client.

Item 12 – Brokerage Practices

A. Recommendation of Custodian[s]

We may recommend a custodian[s] to Clients for execution and/or custodial services. However, we generally do not select our clients' custodian(s). The client generally selects its custodian and authorizes us to direct trades to this custodian as agreed in the investment advisory agreement. Our Clients are not obligated to use any custodian we recommend. We are not obligated to select competitive bids on securities transactions and do not have an obligation to seek the lowest available transaction costs. These costs are determined by the designated custodian.

Soft Dollars

We have a fiduciary duty to our clients to obtain best execution, on an overall basis, for any securities transactions. When determining whether we have obtained best execution, we are guided by Section 28(e) of the Securities Exchange Act of 1934, as amended (the "Safe Harbor"). A safe harbor is a provision of a statute or a regulation that presumptively reduces or eliminates a party's liability on the grounds that the party performed its actions in good faith.

This Safe Harbor is provided by law to investment advisers like us which have "investment discretion" over client accounts, and provides us protection against certain state and federal breach of fiduciary obligation claims (including ERISA claims) because we, the advisor, caused a client to pay more than the lowest available commission when executing a securities trade in exchange for receiving valuable investment research services and products. To rely on the Safe Harbor provision, we must determine in good faith that the amount of the commissions paid is reasonable in relation to the value of the research services we have received. When making this evaluation, we take into account not only the costs for a specific transaction but also our overall responsibility to you. If we cause a client to pay more than the lowest available commission to a broker/dealer in return for research products and services, these payments are commonly referred to as "soft dollar" payments. The soft dollar payments generated are tracked by the broker/dealer to be used on our behalf. Not all trades generate soft dollar benefits, and we try to limit "soft dollar" trades whenever preferable.

The availability of soft dollars, if we use them at all, might have some or all of the following consequences: (1) they might result in the Partnership paying higher transaction costs (including mark-ups and mark-downs on principle transactions with market makers) than the transaction costs charged by other brokers or dealers who do not provide additional services or products, (2) in our capacity as the general partner of the Partnership, we may have an incentive to direct the Partnership's brokerage to brokers or dealers that do not provide the best possible price, and (3) we may have an incentive to effect more transactions on behalf of the Partnership than might otherwise be optimal. The extent of any of the foregoing conflicts of interest between us and our clients depends in large part on the nature and uses of the services and products acquired with soft dollars. These conflicts of interest are particularly influential to the extent that we use soft dollars to pay expenses that we consider essential to our investment advisory activities and that we would otherwise be required to pay ourselves. We believe soft dollar services benefit the Partnership, but they do not benefit the Partnership exclusively—they also are available to us in connection with our own transactions and transactions for the benefit of any future clients, including transactions in which our present clients may not participate.

Notwithstanding the foregoing, we seek to obtain the overall best execution for our clients, taking into account a number of factors, including for example: price, clearance, settlement, reputation, financial strength and stability, efficiency of execution and error resolution, block trading and block positioning capabilities, special execution capabilities, willingness to execute related or unrelated difficult transactions in the future, order of call, on-line access to computerized data regarding clients' accounts, the availability of stocks to borrow for short trades, the competitiveness of commission rates

in comparison to other brokers satisfying our other selection criteria and other matters involved in the receipt of brokerage services generally.

The research and brokerage services we may use soft dollars to acquire are believed to be within the Safe Harbor's provisions. Research services provided by brokers may include economic and market information, portfolio strategy advice, industry and company comments, reports and recommendations, access to research analysts, invitations to attend conferences or meetings with management or industry consultants and certain expenses incurred in attending research conferences.

In addition to research services, we may be offered other non-monetary benefits. These services may include payment of all or a portion of our administrative, operating and overhead costs and expenses. For example, we may allow broker-dealers to pay for all or some of our quotation and communication services (e.g., First Call, Reuters, Bloomberg, etc.), on-line pricing services, account record-keeping, clerical and administrative services and assistance, accounting fees and expenses, including the cost of accounting software and consulting charges, and other reasonable overhead expenses as we determine in good faith.

Certain services and products for which we may be reimbursed by broker-dealers (or for which broker-dealers are paying) may be used for both research and non-research purposes. In these cases, we may allocate the cost of the product or service between their research and non-research uses and pay only the research portion with soft dollars. The non-research portion might then be paid for with "hard dollars" (i.e., our own working capital). Our interest in determining the allocations may differ from your interests in that we have an incentive to designate as much as possible of the cost as research in order to permit payment with soft dollars.

We do not now have, but may implement, a program of broker compensation that consists of directing a certain amount of brokerage business to a broker-dealer in return for the broker's referral of prospective subscribers for interests in the Partnership (or other clients). The direction of brokerage to a broker in exchange for investor referrals would create a conflict of interest in that we might have an incentive to refer brokerage business to brokers to which it might not otherwise direct such business.

2. Brokerage Referrals – We do not receive any compensation from any third party in connection with the recommendation for establishing a brokerage account.

3. Directed Brokerage - All individual managed account clients are serviced on a "directed brokerage basis," where we will place trades within the established account[s] at the custodian designated by the client. 1271787 LLC does not engage in principal transactions (i.e., trade of any security from or to the Advisor's own account) or cross transactions with other client accounts (i.e., purchase of a security into one client account from another client's account[s]).

B. Aggregating and Allocating Trades

We may aggregate orders for multiple clients in a block trade or trades when securities are purchased or sold through the same broker-dealer for multiple (discretionary) accounts. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day are allocated in a manner that is consistent with the initial pre-allocation or other written statement. This endeavor to do this in a way that does not consistently advantage or disadvantage particular client accounts.

Item 13 – Review of Accounts

A. Frequency of Reviews

Accounts are monitored on a regular and continuous basis by Mr. Barber, Managing Director. Formal reviews are generally conducted at least annually or more or less frequently depending on the needs of the client.

B. Causes for Reviews

Each client account is generally reviewed at least annually. Reviews may be conducted more or less frequently at the client's request. Client accounts may be reviewed as a result of major changes in economic conditions, known changes in the client's financial situation, and/or large deposits or withdrawals in the client's account. The client is encouraged to notify us if changes occur in his/her personal financial situation that might adversely affect his/her investment plan. Additional reviews may be triggered by material market, economic or political events.

C. Review Reports

We arrange for clients to receive brokerage statements from its custodian no less than quarterly. The brokerage statements are sent directly from the custodian to the client. Client brokerage statements will include all positions, transactions and fees relating to the client's account[s]. 1271787 LLC also may provide clients with periodic reports from time to time containing their holdings, allocations, and performance.

Item 14 - Client Referrals and Other Compensation

A. Compensation Received by 1271787 LLC

We are a fee-only advisory firm, which, in all circumstances, is compensated solely by the client. 1271787 LLC does not receive commissions or other compensation from product sponsors, broker dealers or any unrelated third parties.

B. Client Referrals from Solicitors

We do not engage paid solicitors for client referrals.

Item 15 – Custody

Custody means holding, directly or indirectly, client funds or securities or having any authority to obtain possession of them. The Securities and Exchange Commission (and most states) have rules and regulations which are designed to safeguard client assets. We follow the rules of the SEC, which require us to follow the following procedures:

Maintain Accounts with Qualified Custodians: We have all client funds and securities, except shares of mutual funds, maintained by a "qualified custodian" (i.e., a bank, registered broker-dealer) in separate accounts for each client. Although we may recommend a custodian, the client generally chooses its own.

Periodic Account Statements: We require each custodian to furnish account statements to our clients no less frequently than monthly. We also require that this statement, at a minimum, identifies the amount of funds and of each security in the account at the end of the quarter and all transactions in the account during the month.

Item 16 – Investment Discretion

We generally will have discretion over the selection and amount of securities to be bought or sold in client accounts without obtaining prior consent or approval from the client, subject to specified investment objectives, guidelines, or limitations previously set forth by the client and agreed to by us. Discretionary authority will only be authorized upon full disclosure to the client. The granting of such authority will be evidenced by the client's execution of an investment advisory agreement containing all applicable limitations to such authority and a limited power of attorney. All discretionary trades made by 1271787 LLC will be in accordance with each client's investment objectives and goals.

Item 17 – Voting client Securities

We do not accept proxy-voting responsibility for individual managed accounts unless instructed to do so by clients. Clients generally receive proxy statements directly from the custodian. The Advisor will assist in answering questions relating to proxies, however, the client retains the sole responsibility for proxy decisions and voting.

Item 18 – Financial Information

A. Balance Sheet

We are not required to deliver a balance sheet along with this brochure as the firm does not collect advance fees of \$500 or more for services to be performed six months or more in advance.

B. Financial Conditions Likely to Impair Ability to Meet Contractual Commitments to Clients

In this Item, we are required to disclose any situation that would impair our ability to meet our financial obligations to our clients. Neither 1271787 LLC nor any of its advisory personnel has any adverse financial situations that would reasonably impair the Company's ability to meet all obligations to its clients.

C. Bankruptcy Petitions in Previous Ten Years

Neither 1271787 LLC nor any of our advisory personnel have been subject to a bankruptcy or financial compromise in the past ten years.

PRIVACY POLICY

Effective: March 21, 2022

Our Commitment to You

1271787, LLC (“the “Company”) is committed to safeguarding the use of your personal information that we have as your investment advisor. The Company (sometimes referred to as "we", "our" and "us" throughout this notice) protects the security and confidentiality of the personal information we have and makes efforts to ensure that such information is used for proper business purposes in connection with the management or servicing of client accounts. Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything we can to maintain that trust.

We do not sell our clients’ non-public personal information to anyone. Nor does the Company provide such information to others except for discrete and proper business purposes in connection with the servicing and management of your account as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this privacy policy.

The Information We Collect About You

You typically provide personal information when you complete the paperwork required to become our client. This information may include your:

• Name and address	• Assets
• E-mail address	• Income
• Phone number	• Account balance
• Social security or taxpayer identification number	• Investment activity
	• Accounts at other institutions

In addition, we may collect non-public information about you from the following sources:

- Information we receive on brokerage agreements, managed account agreements and other subscription and account opening documents;
- Information we receive in the course of establishing a customer relationship including, but not limited to, applications, forms, and questionnaires;
- Information about your transactions with us or others

Information About You That the Company Shares

The Company works to provide products and services that benefit our clients. We may share non-public personal information with non-affiliated third parties (such as brokers and custodians) as necessary for us to provide agreed services and products to you consistent with applicable law. We may also disclose non-public personal information to other financial institutions with whom we have joint business arrangements for proper business purposes in connection with the management or servicing of your account. In addition, your non-public personal information may also be disclosed to you, persons we believe to be your authorized agent or representative, regulators in order to satisfy our regulatory obligations, and is otherwise required or permitted by law. Lastly, we may disclose your non-public personal information to companies we hire to help administrate our business. Companies we hire to provide services of this kind are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. We limit their use of your personal

information to the performance of the specific service we have requested.

To repeat, we do not sell our clients' non-public personal information to anyone.

Information About Former Clients

We do not disclose non-public personal information to non-affiliated third parties with respect to persons who are no longer our clients.

Confidentiality and Security

Our employees are advised about the Company's need to respect the confidentiality of our clients' non-public personal information. We maintain physical, procedural and electronic safeguards in an effort to protect the information from access by unauthorized parties.

We'll Keep You Informed

The Company will send you notice of our privacy policy annually for as long as you maintain an ongoing relationship with us. Periodically we may revise our privacy policy, and will provide you with a revised policy if the changes materially alter the previous privacy policy. We will not, however, revise our privacy policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing. You may obtain a copy of our current privacy policy by contacting us at (646) 732-5945.

Part 2B of Form ADV: Supplemental Brochure

Item 1 – Cover Page

ANDREW DALE BARBER
Managing Director

1271787 LLC

228 Cedar Street
Corning, NY 14830
(646) 732-5945
www.1271787.com

March 2022

This brochure supplement provides information about Andrew Barber that supplements the 1271787, LLC brochure. You should have received a copy of that brochure. Please contact us at the above telephone number if you did not receive our Disclosure Brochure or if you have any questions about the content of this supplement.

Information about Mr. Barber (CRD # _____) is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience
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Mr. Barber was born in 1972.

Educational Background:

<u>School Name</u>	<u>Degree</u>	<u>Year</u>	<u>Major(s)</u>
College of Mount St. Vincent	B.A.	1994	History

Business Experience:

Employment Dates:	9/2021 to Present
Employer Name:	1271787, LLC
Type of Business:	Investment Adviser
Job Title and Duties:	Managing Director; Research analysis, asset management and general administration

Employment Dates:	12/2014 to 9/2021
Employer Name:	Self
Title and Duties:	Consultant, Investor

Employment Dates:	10/2009 to 12/2014
Employer Name:	Waverly Advisors, LLC
Type of Business:	Investment Adviser, Research Service Provider
Job Title and Duties:	Managing Director

Employment Dates:	03/2008 to 10/2009
Employer Name:	Research Edge, LLC
Type of Business:	Research Service Provider
Title and Duties:	Research Analyst

Employment Dates:	01/2007 to 02/2008
Employer Name:	Fort Buford Advisors, LLC
Type of Business:	Asset Management
Title and Duties:	Portfolio Manager

Employment Dates:	12/2005 to 01/2007
Employer Name:	DoubleDown Media
Type of Business:	Financial Publisher
Title and Duties:	Financial Analysis, writing and editing

Employment Dates:	03/2004 to 12/2005
Employer Name:	Self
Title and Duties:	Freelance Writer

Employment Dates: 08/2003 to 03/2004
Employer Name: Jefferies & Co.
Type of Business: Registered Broker-dealer
Title and Duties: Senior Trader

Employment Dates: 07/2001 to 02/2002
Employer Name: Corinthian Partners
Type of Business: Investment Adviser, Research Service
Title and Duties: Research Analyst

Item 3 – Disciplinary Information

Registered investment advisers are required to disclose any material facts regarding any legal or disciplinary actions that would be material to your evaluation of each investment advisor representative providing investment advice to you. Mr. Barber has no information of this type to report.

Item 4 – Other Business Activities

Mr. Barber's sole employment is serving as a Managing Director of 1271787 LLC. He has no other outside business activities to report.

Item 5 – Additional Compensation

Mr. Barber does not receive any economic benefit from any non-client for providing advisory services.

Item 6 – Supervision

Mr. Barber serves as a Managing Director of 1271787 LLC and is self-supervised. However, we are subject to regulatory oversight by various agencies. These agencies require the registration of 1271787 LLC as an investment adviser and certain of our advisory personnel as investment adviser representatives.

Part 2B of Form ADV: Supplemental Brochure

Item 1 – Cover Page

ADAM KING
Managing Director

1271787 LLC

228 Cedar Street
Corning, NY 14830
(646) 732-5945
www.1271787.com

March 2022

This brochure supplement provides information about Adam King that supplements the 1271787, LLC brochure. You should have received a copy of that brochure. Please contact us at the above telephone number if you did not receive our Disclosure Brochure or if you have any questions about the content of this supplement.

Information about Mr. King (CRD # _____) is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Mr. King was born in 1986.

Educational Background:

<u>School Name</u>	<u>Degree</u>	<u>Year</u>	<u>Major(s)</u>
University of Connecticut	B.A.	2009	Spanish

Business Experience:

Employment Dates:	September 2021 to Present
Employer Name:	1271787, LLC
Type of Business:	Investment Adviser
Job Title and Duties:	Managing Director; General administration

Employment Dates:	01/2011 to Present
Employer Name:	King Development LLC
Type of Business:	Software development
Job Title and Duties:	Principal Software Developer; Custom software development

Item 3 – Disciplinary Information

Registered investment advisers are required to disclose any material facts regarding any legal or disciplinary actions that would be material to your evaluation of each investment advisor representative providing investment advice to you. Mr. King has no information of this type to report.

Item 4 – Other Business Activities

In addition to serving as a Managing Director of 1271787 LLC, Mr. King serves as a Principal of King Development LLC, a software developer. In this capacity, Mr. King was responsible for developing the investment software we use to conduct investment research and for other purposes in managing client accounts.

Item 5 – Additional Compensation

Mr. King does not receive any economic benefit from any non-client for providing advisory services.

Item 6 – Supervision

Mr. King serves as a Managing Director of 1271787 LLC and is self-supervised. However, we are subject to regulatory oversight by various agencies. These agencies require the registration of 1271787 LLC as an investment adviser and certain of our advisory personnel as investment adviser representatives.

PRIVACY POLICY

Effective: March 21, 2022

Our Commitment to You

1271787, LLC (“the “Company”) is committed to safeguarding the use of your personal information that we have as your investment advisor. The Company (sometimes referred to as "we", "our" and "us" throughout this notice) protects the security and confidentiality of the personal information we have and makes efforts to ensure that such information is used for proper business purposes in connection with the management or servicing of client accounts. Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything we can to maintain that trust.

We do not sell our clients’ non-public personal information to anyone. Nor does the Company provide such information to others except for discrete and proper business purposes in connection with the servicing and management of your account as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this privacy policy.

The Information We Collect About You

You typically provide personal information when you complete the paperwork required to become our client. This information may include your:

• Name and address	• Assets
• E-mail address	• Income
• Phone number	• Account balance
• Social security or taxpayer identification number	• Investment activity
	• Accounts at other institutions

In addition, we may collect non-public information about you from the following sources:

- Information we receive on brokerage agreements, managed account agreements and other subscription and account opening documents;

- Information we receive in the course of establishing a customer relationship including, but not limited to, applications, forms, and questionnaires;
- Information about your transactions with us or others

Information About You That the Company Shares

The Company works to provide products and services that benefit our clients. We may share non-public personal information with non-affiliated third parties (such as brokers and custodians) as necessary for us to provide agreed services and products to you consistent with applicable law. We may also disclose non-public personal information to other financial institutions with whom we have joint business arrangements for proper business purposes in connection with the management or servicing of your account. In addition, your non-public personal information may also be disclosed to you, persons we believe to be your authorized agent or representative, regulators in order to satisfy our regulatory obligations, and is otherwise required or permitted by law. Lastly, we may disclose your non-public personal information to companies we hire to help administrate our business. Companies we hire to provide services of this kind are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. We limit their use of your personal information to the performance of the specific service we have requested.

To repeat, we do not sell our clients' non-public personal information to anyone.

Information About Former Clients

We do not disclose non-public personal information to non-affiliated third parties with respect to persons who are no longer our clients.

Confidentiality and Security

Our employees are advised about the Company's need to respect the confidentiality of our clients' non-public personal information. We maintain physical, procedural and electronic safeguards in an effort to protect the information from access by unauthorized parties.

We'll Keep You Informed

The Company will send you notice of our privacy policy annually for as long as you maintain an ongoing relationship with us. Periodically we may revise our privacy policy, and will provide you with a revised policy if the changes materially alter the previous privacy policy. We will not, however, revise our privacy policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing. You may obtain a copy of our current privacy policy by contacting us at (646) 732-5945.