

Item 1: Cover Page
Part 2A of Form ADV: Firm Brochure
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CIG FUND, LLC

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This Brochure provides information about the qualifications and business practices of CIG Fund, LLC. If you have any questions about the contents of this Brochure, please contact us at 517-802-8085. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about CIG Fund, LLC also is available on the SEC's website at www.adviserinfo.sec.gov.

CIG Fund, LLC is a Registered Investment Adviser. Registration as an investment adviser does not imply a certain level of skill or training.

Item 2: Material Changes

This is our first brochure submission so there are no material changes to report.

Item 3: Table of Contents

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Item 4: Advisory Business

CIG Fund, LLC (“CIG” or the “Firm”) is a privately held limited liability company organized under the laws of the State of Wyoming. The firm was both established and seeks to become an SEC-registered investment adviser in the second half of 2021. Principal owners of the firm are Jon Solitro and Charles Carey.

CIG offers discretionary and non-discretionary asst management services for a select group of advisory clients. Our services are not limited to any particular type of investments. Through face-to-face meetings and an ongoing relationship, we ascertain client goals, financial status, risk tolerance and other essential information so that all of our services are custom-tailored for each individual client. There are no “cookie cutter” solutions at CIG. We work with clients to create bespoke management plans that aim to structure investments to best meet their ultimate goals.

Clients grant discretionary authority to CIG at the outset of our relationship through our discretionary advisory agreement. CIG will then manage the clients' assets pursuant to the clients' individually-tailored investment plan using a risk-appropriate selection and structure of investments.

Non-discretionary clients engage CIG on an advisory/consulting basis to receive custom-tailored investment recommendations on an ongoing basis. CIG does not have any authority to trade or manage assets on a discretionary basis for non-discretionary clients.

CIG may recommend to clients that all or a portion of their investment portfolio be managed on a discretionary basis by one or more unaffiliated money managers or investment platforms ("External Managers"). The client may be required to enter into a separate agreement with the External Manager(s), which will set forth the terms and conditions of the client's engagement of the External Manager. CIG generally renders services to the client relative to the discretionary selection of External Managers. CIG also assists in establishing the client's investment objectives for the assets managed by External Managers, monitors and reviews the account performance and defines any restrictions on the account. The investment management fees charged by the designated External Managers, together with the fees charged by the corresponding designated broker-dealer/custodian of the client's assets, are exclusive of, and in addition to, the annual advisory fee charged by CIG.

CIG may further recommend investments classified as "alternative investments". Alternative investments, with which CIG is unaffiliated, may include a broad range of underlying assets including, but not limited to, hedge funds, private equity, venture capital, and registered, publicly traded securities. Alternative investments are speculative, not suitable for all clients and intended for only experienced and sophisticated investors who are willing to bear the high risk of the investment, which can include: loss of all or a substantial portion of the investment due to leveraging, short-selling, or other speculative investment practices; lack of liquidity in that there may be no secondary market for the fund and none expected to develop; volatility of returns; potential for restrictions on transferring interest in the fund; potential lack of diversification and resulting higher risk due to concentration of trading authority with a single adviser; absence of information regarding valuations and pricing; potential for delays in tax reporting; less regulation and typically higher fees than other investment options such as mutual funds. The SEC requires investors be accredited to invest in these more speculative alternative investments. Investing in a fund that concentrates its investments in a few holdings may involve heightened risk and result in greater price volatility.

CIG Fund manages portfolios for customers of CIG Capital. Investment advisor representatives do not make recommendations to CIG Fund clients to invest in CIG Capital projects, nor are they incentivized to do so. However, there is common ownership between the two companies, and that can present a conflict of interest. All such conflicts are fully disclosed to every client, and any questions can be directed to the chief compliance officer, Jon Solitro.

To the extent requested by the client, CIG may provide consulting services regarding non-investment related matters, such as estate planning, tax planning, insurance, etc. CIG does not serve as a law firm or accounting firm, and no portion of its services should be construed as legal or accounting services. CIG's consulting services are completed upon communicating its recommendations to the client. To the extent requested by a client, CIG may recommend the services of other professionals for certain noninvestment implementation purposes (i.e. attorneys, accountants, insurance agents, etc.). The client is under no obligation to engage the services of any such recommended professional. The client retains absolute discretion over all such implementation decisions and is free to accept or reject any recommendation from CIG and/or its representatives. Please Note: If the client engages any professional, recommended or otherwise, and a dispute

arises thereafter relative to such engagement, the client should seek recourse exclusively from the engaged professional who shall be responsible for the quality and competency of the services provided

CIG does not offer a wrap fee program.

Because this is an initial registration we do not currently manage any assets.

Item 5: Fees and Compensation

Clients pay an annual advisory fee that is billed monthly. CIG determines its fee by taking their fair market value of assets in a client’s account on the last day of the month and applying the fee as specified on the fee schedule. Fees are generally not negotiable. Our fee schedule is presented below:

Assets Under Management	Annual Fee Shall Not Exceed
\$20—100MM	30 basis points
\$100—250MM	25 basis points
\$250—500MM	20 basis points
Over \$500MM	15 basis points

We may deduct fees from client accounts or invoice clients for fees incurred. Clients are given the choice of which billing method they would prefer. All fees paid to CIG are separate and distinct from other fees clients may incur. These include fees and expenses paid to mutual funds, exchange traded funds (ETFs), real estate investment trusts (REITs), alternative investments, hedge funds, and other private equity or debt funds. Clients will also incur fees from custodians and platforms. In addition, clients will pay brokerage and transaction costs—see [Item 12 – Brokerage Practices](#) for more discussion of our brokerage practices. For External Managers, clients should review each External Manager’s Form ADV 2A disclosure brochure and any contract they sign with the External Manager (in a dual contract relationship). The client is responsible for all such fees and expenses.

Fees for our consulting services are negotiable depending on the scope of services provided.

Clients do not pay fees in advance so that no refunds will need to be paid out. Should a client terminate the relationship CIG will be entitled to the portion of its fee through the effective date of termination.

Neither CIG nor any of its supervised persons accepts compensation for the sale of securities or other investment products.

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

CIG may offer strategies and portfolios that use performance-based fees. These fees are normally with alternative strategies and will be fully disclosed and agreed upon in those advisory agreements.

Item 7: Types of Clients

CIG provides its services to high net worth individuals, institutional investors, business entities, and pension plans.

We require a minimum account balance of at least \$20,000,000 for all of our clients.

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

Methods of Analysis

The aim of all of our approaches to investing is to provide the maximum return for our clients according to their risk tolerance and objectives. CIG analyzes investments through three separate but interrelated lenses. We assess securities markets based on behavioral, fundamental, and quantitative/technical analyses.

First, we understand that much of the market's day-to-day fluctuations—its "volatility"—are caused by the emotional, often irrational, decisions of investors. These decisions often are influenced by the news, by economic data, or simply a herd mentality to buy or to sell. With this knowledge, then, we attempt to filter out the market's noise and make sound investment decisions for client portfolios always with a view to what is in the best interest of our clients' long and short-term goals. We are aided in this unemotional investing by some outside research and data that all place a premium on market facts as opposed to innuendo and reactive decision-making.

Our fundamental analysis of the markets looks to the essential elements of the securities in which we invest on behalf of clients. For equities our analysis will examine a security's price and determine whether that price is justified by its fundamentals. These fundamentals include earnings, value measures, market capitalization, debt burden, management, etc. Bonds and bond funds follow a similar process: we analyze the price, the yield and duration, credit quality, and other factors in order to decide if they are appropriate for our client portfolios. Alternative investments are analyzed along much the same lines with a particular view toward overall client portfolio structure. In this way we are able to avoid the sensitivity of daily emotional price swings and invest based on the security's inherent value.

Similar to our fundamental analysis is our quantitative/technical analysis. As the name implies, this form of analysis looks at the numbers underlying a security. These numbers include its historical price stream and various financial ratios (e.g., price-earnings, price-book, price-sales, dividend yield, etc.). These numbers and accompanying charting patterns of them help us to assess a security's value and the potential for its price to continue appreciating or declining. Thus we can more intelligently determine whether the security qualifies to be included in our client portfolios. We utilize outside research in this aspect of our analysis as well.

Our primary objective in investing for our client portfolios is to do what is in each client's best interest. This will differ with each client—be it absolute return, balanced risk, or current income—though our process will remain the same. To ensure that our client portfolios have the ability to achieve their objectives according to their risk profiles we try to discount the fluctuating behavior of irrational investors and emphasize security selection based on a combination of qualitative and quantitative measurements. **We are always sure to make clients aware that investing in securities involves the risk of loss that they should be prepared to bear.**

Strategies

CIG's strategy for implementing its methods of analysis is asset allocation. Asset allocation means that we attempt to find the right balance among equities, bonds, alternatives, cash, and other investments in order to best achieve a client's investment goals while staying within the risk parameters set forth by the client.

This diversification of investments provides greater opportunities for portfolio appreciation while at the same time reducing the risk of a concentrated portfolio. We utilize separately managed accounts and model asset

allocation portfolios through independent money managers for the management of some client portfolios on a fully disclosed basis. Our asset allocation portfolios can be strategic such that the particular allocation is bought, held, and rebalanced only at certain pre-determined intervals. The asset allocation portfolios may also be tactical such that securities are bought and sold at more frequent intervals in order to attempt to achieve the maximum return for each asset.

Risks

Investing in securities involves risk, including the risk of loss that clients should be prepared to bear. Clients should also be fully informed of the risks described below, should read a fund's prospectus, and ask us for a complete understanding of any other risks involved in investing.

Market Risk. The value of portfolio assets will fluctuate as the stock or bond market fluctuates. The value of investments may decline, sometimes rapidly and unpredictably, simply because of economic changes or other events that affect large portions of the market.

Management Risk. A client's portfolio is subject to management risk because it is actively managed by CIG's investment professionals. CIG will apply its investment techniques and risk analysis in making investment decisions for a client's portfolio, but there is no guarantee that these techniques and CIG's judgment will produce the intended results.

External Manager Risk. CIG may select certain External Managers to manage a portion of its clients' assets. In these situations, the success of such recommendations relies to a great extent on the External Managers' ability to successfully implement their investment strategies. In addition, CIG generally may not have the ability to supervise the External Managers on a day-to-day basis.

Quantitative Tools Risk. Some of CIG's investment techniques may incorporate, or rely upon, quantitative models. There is no guarantee that these models will generate accurate forecasts, reduce risks or otherwise produce the intended results.

Interest Rate Risk. Changes in interest rates will affect the value of a portfolio's investments in fixed-income securities. When interest rates rise, the value of investments in fixed income securities tend to fall and this decrease in value may not be offset by higher income from new investments. Interest rate risk is generally greater for fixed income securities with longer maturities or durations.

Credit Risk. An issuer, obligor or guarantor of a fixed income security, or the counterparty to a derivatives or other contract, may be unable or unwilling to make timely payments of interest or principal, or to otherwise honor its obligations. The issuer or guarantor may default causing a loss of the full principal amount of a security. The degree of risk for a particular security may be reflected in its credit rating. There is the possibility that the credit rating of a fixed income security may be downgraded after purchase, which may adversely affect the value of the security. Investments in fixed income securities with lower ratings tend to have a higher probability that an issuer will default or fail to meet its payment obligations.

Allocation Risk. The allocation of investments among different asset classes may have a significant effect on portfolio value when one of these asset classes is performing more poorly than the others. As investments will be periodically reallocated, there will be transaction costs which may be, over time, significant. In addition, there is a risk that certain asset allocation decisions may not achieve the desired results and, as a result, a client's portfolio may incur significant losses.

Foreign (Non-U.S.) Risk. A portfolio's investments in securities of non-U.S. (or foreign) issuers may involve more risk than those of U.S. issuers. These securities may fluctuate more widely in price and may be less liquid due to adverse market, economic, political, regulatory or other factors.

Emerging Markets Risk. Securities of companies in emerging markets may be more volatile than those of companies in developed markets. By definition, markets, economies and government institutions are generally less developed in emerging market countries. Investment in securities of companies in emerging markets may entail special risks relating to the potential for social instability and the risks of expropriation, nationalization or confiscation. Investors may also face the imposition of restrictions on foreign investment or the repatriation of capital and a lack of hedging instruments.

Currency Risk. Fluctuations in currency exchange rates may negatively affect the value of a portfolio's investments or reduce its returns.

Derivatives Risk. Certain strategies involve the use of derivatives to create market exposure. Derivatives may be illiquid, difficult to price and leveraged so that small changes may produce disproportionate losses for a client's portfolio and may be subject to counterparty risk to a greater degree than more traditional investments. Because of their complex nature, some derivatives may not perform as intended. As a result, a portfolio may not realize the anticipated benefits from a derivative it holds, or it may realize losses. Derivative transactions may create investment leverage, which may increase a portfolio's volatility and may require the portfolio to liquidate portfolio securities when it may not be advantageous to do so.

Capitalization Risk. Investments in small- and mid-capitalization companies may be more volatile than investments in large-capitalization companies. Investments in small-capitalization companies may have additional risks because these companies have limited product lines, markets or financial resources.

Liquidity Risk. Liquidity risk exists when particular investments are difficult to purchase or sell, possibly preventing CIG from selling out of such illiquid securities at an advantageous price. Derivatives and securities involving substantial market and credit risk also tend to involve greater liquidity risk.

Issuer Specific Risk. The value of an equity security or debt obligation may decline in response to developments affecting the specific issuer of the security or obligation, even if the overall industry or economy is unaffected. These developments may comprise a variety of factors, including, but not limited to, management issues or other corporate disruption, political factors adversely affecting governmental issuers, a decline in revenues or profitability, an increase in costs, or an adverse effect on the issuer's competitive position.

Concentrated Portfolios Risk. Certain investment strategies focus on particular asset classes, countries, regions, industries, sectors or types of investments. Concentrated portfolios are an aggressive and highly volatile approach to trading and investing. Concentrated portfolios hold fewer different stocks than a diversified portfolio and are much more likely to experience sudden dramatic prices swings. In addition, the rise or drop in price of any given holding is likely to have a larger impact on portfolio performance than dramatic prices swings. In addition, the rise or drop in price of any given holding is likely to have a larger impact on portfolio performance than a more broadly diversified portfolio.

Initial Public Offerings Risk. Investment in companies that have recently completed initial public offerings ("IPOs") are subject to market risk including the possible loss of principals. These stocks are unseasoned

equities lacking trading history, a track record of reporting to investors and widely available research coverage which may result in extreme price volatility.

ESG Risk. The ESG investment strategy limits the types and number of investment opportunities available and, as a result, the strategy may underperform other strategies that do not have an ESG focus. The ESG investment strategy may result in the Fund investing in securities or industry sectors that underperform the market as a whole or underperform other funds screened for ESG standards.

Inverse ETF Risk. Inverse ETFs in which the Fund may invest seek to provide the inverse daily return of a particular index or group of securities. Over time, the Inverse ETF's returns may differ dramatically from the returns of the underlying index or group of securities. Longer holding periods and market volatility will exacerbate the differences in the Inverse ETF's returns compared to those of the index or group of securities. It is possible that an Inverse ETF may decline in value even when the value of the index or group of securities falls.

Leveraged ETF Risk. Investing in leveraged ETFs will amplify the Fund's gains and losses. Most leveraged ETFs "reset" daily. Due to the effect of compounding, their performance over longer periods of time can differ significantly from the performance of their underlying index or benchmark during the same period of time.

Pandemic Risk. The recent COVID-19 pandemic has caused and continues to cause disruptions in economies and individual companies and volatility in financial markets throughout the world, including those in which CIG clients ("Clients") invest. The impact of the pandemic and resulting economic disruptions may negatively impact the Clients and the performance of their portfolios due to, among other things, (i) interruption of business operations resulting from travel restrictions, reduced consumer spending, and quarantines of employees, customers and suppliers in areas affected by the outbreak, (ii) closures of manufacturing facilities, warehouses and logistics supply chains, and (iii) uncertainty about the duration of the virus' impact on global financial markets. Governments and central banks throughout the world have responded to the pandemic and resulting economic disruptions with a variety of fiscal and monetary policy changes, including direct capital infusions into companies and other issuers, new monetary policy tools and lower interest rates, but the ultimate impact of these efforts is uncertain. It is not possible to determine the duration or severity of the disruption in financial markets or the long-term economic impact of the COVID-19 pandemic, or other future epidemics or pandemics, which may adversely affect the Clients' performance and investment strategies and significantly reduce available investment opportunities.

Legal or Legislative Risk. Legislative changes or court rulings may impact the value of investments or the securities' claim on the issuer's assets and finances.

Risks Associated with Investment Strategies and Methods of Analysis. CIG's securities analysis methods rely on the assumption that the companies whose securities the firm purchases and sells, the rating agencies that review these securities, and other publicly available sources of information about these securities, are providing accurate and unbiased data. While the firm is alert to indications that data may be incorrect, there is always the risk that CIG's analysis may be compromised by inaccurate or misleading information.

Equity Securities. The major risks associated with investing in equity securities relate to the company's capitalization, quality of the company's management, quality and cost of the company's services, the company's ability to manage costs, efficiencies in the manufacturing or service delivery process, management of litigation risk and the company's ability to create shareholder value (e.g., increase the value of the company's stock price).

SPAC Risk. SPACs are companies that may be unseasoned and lack a trading or operational history, a track record of reporting to investors, and widely available research coverage. CIG may purchase SPACs through an IPO. IPOs are thus often subject to extreme price volatility and speculative trading. These stocks may have above-average price appreciation in connection with the IPO. In addition, IPOs may share similar illiquidity risks of private equity and venture capital. The free float shares held by the public in an IPO are typically a small percentage of the market capitalization. The ownership of many IPOs often includes large holdings by venture capital and private equity investors who seek to sell their shares in the public market in the months following an IPO when shares restricted by lock-up are released, causing greater volatility and possible downward pressure during the time that locked-up shares are released. Public stockholders of SPACs may not be afforded a meaningful opportunity to vote on a proposed initial business combination because certain stockholders, including stockholders affiliated with the management of the SPAC, may have sufficient voting power, and a financial incentive, to approve such a transaction without support from public stockholders. As a result, a SPAC may complete a business combination even though a majority of its public stockholders do not support such a combination.

Tail Risk. Tail risk, sometimes called "fat tail risk," is the financial risk of an asset or portfolio of assets moving more than three standard deviations from its current price, above the risk of a normal distribution. Tail risks include low-probability events arising at both ends of a normal distribution curve, also known as tail events.

Exchange Traded Funds (ETFs). ETFs are subject to risks similar to those of stocks. Investment returns will fluctuate and are subject to market volatility, so that when shares are sold they may be worth more or less than their original cost. ETF shares are bought and sold at market price (not Net Asset Value) and are not individually redeemed from the fund.

Equity Mutual Funds. The major risks associated with investing in equity mutual funds is similar to the risks associated with investing directly in equity securities, including market risk, which is the risk that investment returns will fluctuate and are subject to market volatility, so that an investor's shares, when redeemed or sold, may be worth more or less than their original cost. Other risks include the quality and experience of the portfolio management team and its ability to create fund value by investing in securities that have positive growth, the amount of individual company diversification, the type and amount of industry diversification and the type and amount of sector diversification within specific industries. In addition, mutual funds tend to be tax inefficient and therefore investors may pay capital gains taxes on fund investments while not having yet sold their shares in the fund.

Swaps. Investments in swaps may involve greater risks than if an ETF or Mutual Fund had invested in the reference obligation directly. In addition to the risks applicable to derivatives generally, swaps (e.g. interest rate swaps, credit default swaps) involve special risks because they may be difficult to value and may be more susceptible to liquidity and credit risk.

Money Market Funds. You could lose money by investing in the Fund. An investment in the Fund is not insured or guaranteed by the Federal Deposit Insurance Corporation or other government agency. The Fund's sponsor has no obligation to provide support to the Fund, and you should not expect that the sponsor will provide financial support to the Fund at any time.

Fixed Income Mutual Funds. In addition to the risks associated with investing in equity mutual funds, fixed income mutual funds also carry the following risks: (1) Credit Risk – the risk that a company or bond issuer may fail to pay principal and interest payments in a timely manner; (2) Interest Rate Risk – the risk that the market

value of the bonds will go down when interest rates rise; and (3) Prepayment Risk – the risk that a bond will be paid off early.

Indexed Funds. Indexed Funds have the potential to be affected by “tracking error risk” which means a deviation from a stated benchmark index. Since the core of a portfolio may attempt to closely replicate a benchmark, the source of the tracking error (deviation) may come from a “sample index” that may not closely align the benchmark. In addition, while many index mutual funds are known for their potential tax efficiency and higher “qualified dividend income” (QDI) percentages, there are assets classes within these funds or holding periods that may not benefit. Shorter holding periods, as well as commodities and currencies that may be part of a fund’s portfolio, may be considered “non-qualified” under certain tax code provisions.

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

Managed Futures. Investments in long and short positions in commodity futures contracts, currency forward contracts, swaps and other derivatives can be volatile and may be less liquid than other securities and more sensitive to the effects of varied economic conditions.

Alternative Investments. The performance of alternative investments (e.g., commodities, futures, hedge funds; funds of hedge funds, private equity or other types of limited partnerships) can be volatile. Alternative investments generally involve various risk factors and liquidity constraints, a complete discussion of which is set forth in the offering documents of each specific alternative investment. Due to the speculative nature of alternative investments a client must satisfy certain income or net worth standards prior to investing.

Highly Volatile Markets. The prices of financial instruments can be highly volatile. Price movements of forward and other derivative contracts are influenced by, among other things, interest rates, changing supply and demand relationships, trade, fiscal, monetary and exchange control programs and policies of governments, and national and international political and economic events and policies. Clients are also subject to the risk of failure of any of the exchanges on which their positions trade or of its clearinghouses.

Use of Financing. A Client may pledge its securities in order to borrow additional funds for investment purposes. Any event which adversely affects the value of an investment by the Client would be magnified to the extent the Client is leveraged. The cumulative effect of the use of leverage by a Client in a market that moves adversely to the Client’s investments could result in a substantial loss that would be greater than if the Client were not leveraged.

Hedging Transactions. While a Client may enter into hedging transactions to seek to reduce risk, such transactions may result in a poorer overall performance for the Client than if it had not engaged in any such hedging transactions. For a variety of reasons, CIG may not seek to establish a perfect correlation between such hedging instruments and the portfolio holdings being hedged. Such imperfect correlation may prevent a Client from achieving the intended hedge or expose the Client to risk of loss.

Small- and Mid-Cap Risks. Securities of small-cap issuers may present greater risks than those of large-cap issuers. For example, some small- and mid-cap issuers often have limited product lines, markets, or financial resources. They may be subject to high volatility in revenues, expenses and earnings. Their securities may be thinly traded, may be followed by fewer investment research analysts and may be subject to wider price swings and thus may create a greater chance of loss than investing in securities of larger-cap issuers. The market prices of securities of small- and mid-cap issuers generally are more sensitive to changes in earnings expectations, to corporate developments and to market rumors than are the market prices of large-cap issuers.

Frequent Trading and Investment Performance. CIG's tactical strategies are actively managed in a daily basis and frequent trading may occur. Strategies involving frequent trading of securities can affect investment performance through increased brokerage and other transaction costs and taxes.

Concentrated Portfolios. Concentrated portfolios are an aggressive and highly volatile approach to trading and investing. Concentrated portfolios hold fewer different stocks than a diversified portfolio and are much more likely to experience sudden dramatic price swings. In addition, the rise or drop in price of any given holding is likely to have a larger impact on portfolio performance, than a more broadly diversified portfolio.

Use of Leverage. Some of the strategies can utilize levered index products. Leveraged ETFs are considered risky. The use of leverage strategies by a fund increases the risk to the fund and magnifies gains or losses on the investment. You could incur significant losses even if the long-term performance of the underlying index showed a gain. Most leveraged ETFs "reset" daily. Due to the effect of compounding, their performance over longer periods of time can differ significantly from the performance of their underlying index or benchmark during the same period of time.

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 the Advisor. For more information on our investment management services, please contact us at 517-802-8085.

Item 9: Disciplinary Information

CIG is required to disclose the facts of any legal or disciplinary events that could be material to our clients' or prospective clients' evaluation of our advisory business and integrity. We have no disciplinary information to disclose.

Item 10: Other Financial Industry Activities and Affiliations.

Neither CIG nor any of its management persons are registered or have applied to become registered as broker-dealers or registered representatives of a broker-dealer.

Neither CIG nor any of its management persons are registered or have applied to become registered as futures commission merchants, commodity pool operators, or commodity trading advisors.

Jon Solitro owns and is an investment adviser representative of FinancialMD, LLC, a Michigan registered investment adviser. This does not present a conflict of interest because CIG and FinancialMD service separate and distinct clientele. In all events, clients of both firms are made fully aware of the existence of the firms and the mutual ownership of Mr. Solitro.

CIG may recommend that clients use External Managers based on clients' needs and suitability. CIG does not receive separate compensation, directly or indirectly, from such External Managers for recommending that clients use their services. CIG does not have any other business relationships with the recommended External Managers.

Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

CIG has established a firm-wide code of ethics that emphasizes honesty, fair-dealing, and our fiduciary duty to our clients. Every action we take on behalf of clients must always be in the client's best interest. This is achieved through a complete understanding of our clients' financial health and goals, and then tailoring investment advice to these circumstances. We will always strive to seek the best execution for our client transactions so that they will not incur unnecessary fees and we thereby seek to maximize their investment value.

Our code imposes on CIG a duty of loyalty to our clients such that our interests will never trump those of our clients. Should conflicts of interest exist or arise, CIG is obligated to provide full disclosure to our clients so that clients may make a fully-informed decision as to how they wish to proceed. At all times clients will be fully apprised of all material facts of their advisory relationship with CIG. Clients will have the opportunity to review this brochure before deciding to enter into an advisory relationship with us. In addition, all clients and prospective clients are entitled to a copy of our code of ethics. Please contact the firm using the information on the first page of this brochure to request and receive your copy.

CIG recommends certain securities in which CIG and its related persons would receive compensation as part of the fees related to such securities. This presents a conflict of interest because CIG and its related persons receive more compensation if a client invests in these securities rather than others. Clients are fully informed of the conflict and have absolutely no obligation to invest in such securities.

CIG and its related persons will invest in the same securities as its clients. This presents a potential conflict of interest in that CIG and its related persons may be in a position to materially benefit from transactions in these securities. There is the potential for "scalping," wherein a security held by CIG is recommended to clients and then sold for a profit after clients have purchased; there is the potential for "front running" wherein CIG could execute securities transactions prior to executing them in client accounts in order to achieve a more favorable price; there is also the potential for insider trading and other abusive practices. To deal with these conflicts, CIG has initiated, within our code of ethics, a firm-wide securities holdings and transactions report that is reviewed in its entirety by the Chief Compliance Officer ("CCO"). The CCO examines holdings and timing of transactions and compares them to our client accounts. In addition, we have instituted a three-day buffer time between client and Firm related person securities transactions. The CCO looks for the abuses described above and makes sure that we are adhering to our fiduciary duty to always and everywhere put our clients' interest ahead of our own.

Item 12: Brokerage Practices

CIG is independently owned and operated. We are not affiliated with any custodian or broker-dealer. We use or suggest custodians/brokers that we reasonably believe will provide best price and execution. We consider reputation, integrity, access, ability, level of communication, responsiveness, block trading capability and established mechanisms to provide best price and execution. Our custodians are independent and unaffiliated FINRA-registered broker-dealers. We may recommend that you establish accounts with these custodians to maintain custody of your assets and to effect trades for your accounts. Some of the products, services and other

benefits provided by our Custodians benefit us and may not benefit you or your account. We do not use or suggest custodians/brokers or direct brokerage in exchange for fees, products, research, services, payments for order flow, rebates, soft dollars or other compensation.

Clients are entitled to direct their brokerage. A client that directs we use a particular broker must do so in writing and is responsible for negotiating terms, arrangements and commissions with that broker. If a client directs brokerage, we will be unable to aggregate their trades with those of other clients, reducing their chance to participate in block trades and obtain volume discounts and this will impact our ability to obtain best execution. Accounts that direct brokerage may pay higher commission rates. Additionally, trades for directed accounts are generally executed after nondirected accounts which may result in less favorable prices and execution.

We may aggregate trades using our trading software in an attempt to achieve best price and execution. Trades are aggregated by broker. If we aggregate orders, shares are allocated to all accounts served by any given broker at the average price we received on the day and each account pays its own respective commission costs. Trades for accounts that use custodians that charge trade-away fees or who charge fees to step into trades executed by another broker (step-out trades) may not be aggregated with those of other clients that we have the ability to direct to a broker of our choice without incurring an additional fee. These accounts will not receive the same average price as the accounts that were block traded and this may impact our ability to obtain best execution.

In the event of a partial fill, no related party accounts receive any allocation. We use our trading software to allocate on a pro rata basis or to allocate "all or none" on a random basis to avoid multiple commission charges that would result from a series of small, partially filled orders. However, if either of those methods would somehow result in clients being disadvantaged, our Chief Compliance Officer or Founder can override the software and instruct a manual allocation in a good faith effort to eliminate or mitigate such disadvantage.

We have implemented policies and procedures to monitor best price and execution. Our CCO or other officer of the firm in his absence, reviews a report generated every trading day detailing every executed trade. Additionally, we periodically review broker performance and statistics relative to best price and execution and examine and review commission structures in an effort to obtain competitive pricing for our clients.

Item 13: Review of Accounts

Accounts are subject to continuous monitoring and supervision and reviewed at least monthly. There are no specific factors triggering review and no procedure determining the sequence in which accounts are reviewed. Reviews are performed by the President and/or the Chairman of the firm.

Clients receive regular monthly reports of their portfolio holdings directly from an independent custodian. These reports will show positions/holdings, amounts, performance, dividends paid, etc. Many custodians also provide clients online access through their website that allows them to view their accounts on an ongoing basis.

Item 14: Client Referrals and Other Compensation

CIG does not receive any economy benefits from non-clients for our advisory services.

Neither CIG nor any of its related persons directly or indirectly compensate any person for client referrals.

Item 15: Custody

CIG does not accept or maintain custody of any client accounts, except as related to technical or constructive custody as a result of debiting fees from client accounts directly. Clients should compare the fee invoice from the advisor to the custodian account statement for accuracy. All clients must place their assets with a qualified custodian. Clients are required to select their own custodian to retain their funds and securities and direct CIG to utilize that custodian for the client's security transactions. CIG encourages clients to review statements provided by account custodian. For more information about custodians and brokerage practices, see *Item 12 - Brokerage Practices*.

On occasion, and if requested by the client, CIG may prepare and provide to the client a performance report using a third-party performance reporting and account aggregation software. The third-party performance reporting and account aggregation software is for the convenience of CIG and client to view historical performance and account holdings utilizing a secure statement consolidation and reporting service. CIG encourages each client to compare the performance reports they receive from CIG with those received from the custodian of their account.

Item 16: Investment Discretion

CIG generally has 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. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the client and agreed to by CIG. 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. All discretionary trades made by CIG will be in accordance with each client's investment objectives and goals.

Item 17: Voting Client Securities

CIG does not accept proxy-voting responsibility for any client. Clients will receive proxy statements directly from the custodian. CIG will assist in answering questions relating to proxies, however, the client retains the sole responsibility for proxy decisions and voting.

Item 18: Financial Information

CIG does not require or solicit prepayment of any fees from clients. CIG is not required to deliver a balance sheet along with this Brochure as the firm *does not* collect advance fees for services to be performed *six months* or more in advance. Neither CIG nor its management has any adverse financial situations that would reasonably impair the ability of CIG to meet all obligations to its Clients. Neither CIG, nor any of its advisory persons, has been subject to a bankruptcy or financial compromise.