



Part 2A of Form ADV: Firm Brochure
Item 1: Cover Page
March 2023

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This brochure provides information about the qualifications and business practices of Belmont Capital, LLC. If you have any questions about the contents of this brochure, please contact us by telephone at (310) 203-2670 or email SRemboski@BelmontCapGroup.com. 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.

Belmont Capital Group™ is a SEC-registered investment adviser. Additional information about Belmont Capital Group also is available on the SEC's website at www.adviserinfo.sec.gov by searching with our firm name or CRD# 154078.

Please note that the use of the term "registered investment adviser" and description of Belmont Capital Group and/or our associates as "registered" does not imply a certain level of skill or training. You are encouraged to review this Brochure and Brochure Supplement for our firm's associates who advise you for more information on the qualifications of our firm and our employees.

Item 2: Material Changes to Our Part 2A of Form ADV: Firm Brochure

Belmont Capital Group[™] is required to advise you of any material changes to our Firm Brochure (“Brochure”) from our last annual update, identify those changes on the cover page of our Brochure or on the page immediately following the cover page, or in a separate communication accompanying our Brochure.

Since our last annual amendment filed on February 18, 2022, we have one material change to report:

- Item 8: Investment Strategies revised to include Index Solutions.
- Item 14: Client Referrals & Other Compensation revised for changes to Rule §206(4)-1 (“Marketing Rule”) under the Advisers Act, which updated the previous “Advertising Rule” and merged it with Rule §206(4)-3 (“Cash Solicitation Rule”).

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Item 4: Investment Management Business

Belmont Capital, LLC is a limited liability company formed in the State of California, d/b/a Belmont Capital Group™ (Belmont). Belmont is a SEC Registered Investment Adviser with its principal place of business located in Los Angeles, California. Our firm has been in business as an investment adviser since 2010 and is owned as follows:

- Daniel Beckwith – 50% Owner
- Stephen Solaka – 50% Owner

Our investment management services provide for continuous advice through specialized options strategies for individuals, high-net-worth individuals, family offices, wealth advisory firms, institutional clients, and Registered Investment Companies. As of December 31, 2022, asset under management totaled \$478,338,851.

Description of the Types of Investment Management Services We Offer

Belmont provides systematic and disciplined options strategies to our clients. Our portfolio managers have decades of derivative portfolio management and trading experience. We offer our investment management services in the form of:

- a) Index Spread Writing,
- b) Low Volatility ETF Strategies,
- c) Custom Solutions,
- d) Index Solutions

Additionally, our Advisory accounts are managed according to each investors profile considering: return requirement, risk tolerance, liquidity preference, investment horizon, and tax considerations.

Options Strategies

We use options as an integral part of our investment strategies. We employ option strategies which include covered call and collar strategies. We will utilize a systematic process of writing S&P 500 Index option call spreads and put spreads. We also provide Index Solutions which utilize rules based indexes using: put writing, put spread writing, and protective option purchases. An option is a contract that gives the buyer the right, but not the obligation, to buy or sell an asset (such as a share of stock) at a specific price on or before a certain date. An option, just like a stock or bond, is a security. An option is also a derivative because it derives its value from an underlying asset.

The two types of options are calls and puts:

- A call gives the holder the right to buy an asset at a certain price within a specific period of time.
- A put gives the holder the right to sell an asset at a certain price within a specific period of time.

We will also use options to "hedge" the ownership of the underlying security; in other words, we will use an option purchase to limit the potential upside and downside of a security. We use "covered calls", in which we sell an option on a security you own. We use a "collar strategy", in which we execute two or more option contracts (for example, a put option that you buy and a call option that

you sell) for the same underlying security. This effectively puts you on both sides of the market, but with the ability to vary price, time and other factors. A risk of collar strategies is that the ability to fully profit from a price swing is limited.

Derivatives carry significant risks. These can include loss of principal or more than the initial investment. The primary risks associated with derivatives are:

- Market risk that the market value of the investment will decline;
- Credit risk that the counter-party to the transaction will default on its obligations;
- Liquidity risk that the instrument will not be readily marketable;
- Valuation risk that, because the instrument is thinly traded, it may have only one pricing source.

Sub-Advisory Services

Belmont has made arrangements to be designated as the investment manager for clients of other wealth advisory firms. In such instances, clients are enrolled in one of our investment management strategies or a customized solution through executing an investment management agreement with Belmont.

As investment manager, we provide our standard Investment Management services to a portion of the client's assets and have full investment discretion.

Wrap Fee Programs

We do not sponsor wrap fee programs, and we do not participate in wrap fee programs.

Services to Registered Investment Companies

Belmont offers investment advisory services to the Belmont Theta Income Fund (the "Fund"), a series of the Valued Advisers Trust, a registered investment company. As an investment adviser to the Fund, Belmont, our Supervised Persons, and our investment activities are subject to various aspects of the Investment Company Act of 1940 and rules thereunder, other federal laws and regulations relating to investment companies, and the Fund's disclosure documents and internal policies and procedures. Belmont seeks to conduct its activities in accordance with these regulatory requirements and its fiduciary duty to the Fund. The Fund's board of directors has oversight responsibility of the Fund's service providers, including the Fund's investment advisers such as Belmont.

Belmont is responsible for making all investment decisions concerning the investment and reinvestment of the assets of the Fund in accordance with the Fund's investment objectives and policies, as outlined in the Prospectus and Statement of Additional Information. Additional services include, but are not limited to, placing transactions for the purchase and/or sale of securities with a broker-dealer selected by Belmont and providing the Fund with certain information and documents to help prepare and maintain its books and records.

Additional information about the Fund, including the Prospectus and Statement of Additional Information, is available online at www.BelmontCapFunds.com. Prospective investors should review these documents carefully before making any investment in the Belmont Theta Income Fund.

Item 5: Fees & Compensation

How We Are Compensated for Our Investment Management Services

Billing Process:

Belmont Capital Group's annualized fees are billed on a pro-rata basis quarterly in advance based on the value of your account on the last day of the previous quarter. Fees for the first period covered by the agreement are prorated to cover only the period remaining in the current quarter.

Fees will be deducted from your managed account. As part of this process, the client is made aware of the following:

- a) Your independent custodian sends statements at least quarterly to you showing the market values for each security included in the account, and all disbursements in your account including the amount of the investment management fees paid to us;
- b) You provide authorization permitting us to be directly paid by these terms. We send our invoice directly to the custodian; and
- c) If we send a copy of our invoice to you, it will include a legend urging you to compare information provided in our statement with those from the qualified custodian.

Fees for Our Strategies:

- Theta Overlay ProgramSM clients pay an annual investment management fee of 0.65% of the Notional Value of their accounts.
- Put Write solutions clients pay an annual investment management fee of 0.75% of the Notional Value of their accounts.

To derive the Notional Value, we use the following formula: $(\text{Number of Options Contracts Traded}) \times (\text{Value of Underlying Security}) \times 100$. One fourth of the annual fee is charged each quarter based on the Notional Value of the client's portfolio as of the last day of the prior calendar quarter. The formula used for the calculation is as follows: $(\text{Annual Rate}) \times (\text{Notional Value at Quarter-End}) / 4$.

- Global Low VolatilitySM and U.S. Low VolatilitySM clients pay an annual investment management fee of 1.00% of their asset value.
- Single Stock/Portfolio Risk Management, Defined Outcome and Advisory clients pay an annual investment management fee of 1.00% of their asset value.
- Index Solutions clients pay an annual investment management fee of 0.75% of their asset value.

One fourth of the annual fee is charged each quarter based on the market value of the client's portfolio as of the last day of the prior calendar quarter. The formula used for the calculation is as follows: $(\text{Annual Rate}) \times (\text{Total Assets Under Management at Quarter-End}) / 4$.

Fees for Our Sub-Advisory Services:

The sub-advisory fee paid to us shall be determined by our standard Fees for Our Strategies (above).

Belmont Theta Income Fund:

Belmont provides investment advisory services to the Belmont Theta Income Fund, a series of the Valued Advisers Trust, a registered investment company. The Fund's advisor fee and expense related information may be found in the Prospectus or Statement of Additional Information available online at www.BelmontCapFunds.com.

Other Types of Fees & Expenses

The investment management fees due to Belmont are separate from, and in addition to, any brokerage commissions, transaction fees, and other related costs and expenses which are typically incurred by the client. Clients may incur certain charges imposed by custodians, brokers and other third parties such as fees charged for wire transfer, electronic fund fees, and other fees and taxes.

Also, we do not receive any part of charges imposed directly by any mutual fund, index fund, or exchange traded fund which shall be disclosed in each fund's prospectus (i.e., fund management fees and other fund expenses).

Item 12 below discussed how our clients have the discretion to select a brokerage firm for custody of securities, trade execution, clearance and settlement of transactions. Clients should consider the reasonableness of their compensation (e.g., commissions) in making their selection.

Termination & Refunds

We charge our investment management fees quarterly in advance. In the event that you wish to terminate our services, we will refund the unearned portion of our investment management fee to you. You need to contact us in writing and state that you wish to terminate our services. Upon receipt of your letter of termination, we will proceed to close out your account and process a pro-rata refund of unearned investment management fees using the following formula: $(Fees\ Paid) \times (Days\ Remaining\ in\ Quarter) / (Total\ Number\ of\ Days\ in\ Quarter)$.

Limited Prepayment of Fees

Under no circumstances does Belmont require or solicit payment of fees in excess of \$1,200 more than six months in advance of services rendered.

Commissionable Securities Sales

We do not sell securities for a commission in our investment management accounts.

Belmont will not receive sales commissions in connection with sales of interests in Belmont Theta Income Fund or any other investment company advised or sub-advised by Belmont. Also, no employees of Belmont are registered representatives of Ultimus Fund Solutions, LLC (parent company of Unified Financial Securities, LLC, the distributor of the Fund). No Belmont employees receive sales-based compensation for marketing and promoting the Fund to financial intermediaries or clients.

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

We do not charge any performance-based fees.

Item 7: Types of Clients & Account Requirements

Belmont provides investment management services to the following types of clients:

- Individuals and High Net Worth Individuals
- Individual Retirement Accounts
- Estates and Trusts
- Institutional Clients
- Investment Companies

Our minimum requirements for opening and maintaining accounts or otherwise engaging us:

- Theta Overlay ProgramSM: \$1,500,000 Notional Exposure
- Put Write solutions.: \$1,000,000 Notional Exposure
- Global Low VolatilitySM, U.S. Low VolatilitySM, and Advisory: \$250,000
- Single Stock/Portfolio Risk Management, Defined Outcome: \$500,000
- Index Solutions: \$500,000

This minimum account balance requirement may be negotiable in certain instances and would be required throughout the course of the client's relationship with our firm.

- Notional Exposure

Theta Overlay Program and Put Write solutions have an underlying portfolio comprised of equities, fixed income, or cash released by the client as Collateral Backing. Belmont will invest Theta Overlay Program with notional exposure up to client specified collateral leverage multiple and Put Write notional exposure up to the amount of collateral release.

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

Methods of Analysis

Belmont Capital Group provides clients with a proactive, risk managed approach to investing. Our focus is leveraging our institutional options experience to enhance and shape traditional return streams. We accomplish this by utilizing only exchange traded instruments with high levels of liquidity and transparency. Our approach to managing investment risk steps beyond traditional methods of diversification and modern portfolio theory.

We use the following methods of analysis in formulating our investment advice and/or managing client assets:

Technical Analysis – is a methodology for forecasting the direction of market prices through the analysis of past market data in order to determine market trends, support and resistance levels, logical profit objectives, and exit points. Our methods include analysis of moving averages, cyclical analysis and charting analysis.

The risks in using technical analysis are:

- Indicators may underperform in market environments that lack clear performance trends;
- Indicators may underperform in market environments where the sector leadership shifts quickly;
- Indicators may be skewed by large price spikes.

Quantitative Analysis – we use proprietary mathematical models to search for patterns which indicate favorable conditions for buying and/or selling securities. A risk in using quantitative analysis is that the models used may be based on assumptions that prove to be incorrect.

Investment Management Strategies

Index Spread Writing

Belmont offers its proprietary Theta Overlay ProgramSM strategy for investors seeking alternative income and absolute returns via risk-managed index option spread writing.

Theta Overlay ProgramSM (TOP)

TOP seeks to generate positive annual returns uncorrelated to traditional asset classes. Belmont implements the strategy by capturing arbitrage opportunities that are found in the persistent risk premiums paid by purchasers of equity index options. An underlying portfolio comprised of equities, fixed income, or cash is released by the client as "Collateral Backing". Management of the Collateral Backing is not part of the Theta Overlay Program strategy. Therefore, the value of the Collateral Backing and any collateral income are not included in Theta Overlay Program Composite performance calculation. Notional exposure is determined by the client specified collateral leverage multiple. Collateral leverage will magnify losses as well as gains. The initial option premium collected and strike price levels of option spreads are determined by a delta-based analysis of index implied volatility and skew relationships. Option spreads are initiated market neutral with expirations in approximately 30 to 45 days.

The objective of option spreads is to minimize losses in the event of unexpected extreme movements in the market. Option spreads are not intended to be held until expiration as the strategy focus is on realizing premiums collected and adjusting strike price levels to manage risk as market conditions change.

Low Volatility ETF Strategies

Belmont offers two Low Volatility ETF strategies. The objective is to lower the overall risk of investing in global equities by balancing lower volatility and an additional income stream with total return.

These strategies utilize highly liquid ETFs and options, providing risk managed exposure to global equity markets. Our Low Volatility ETF strategies are:

Global Low VolatilitySM (GLV)

GLV is designed to provide investors global equity market returns with lower volatility and an additional income stream. To achieve this, Belmont will purchase a globally diversified portfolio of ETF's and employ an options "covered call" writing strategy on each corresponding ETF. Under a covered call strategy an investor writes a call that is covered by an equivalent long position. It provides a small hedge on the ETF and allows the investor to earn premium income, in return for forfeiting potential upside appreciation.

U.S. Low VolatilitySM (USLV)

USLV is designed to provide investors U.S. large-cap equity market returns with lower volatility and an additional income stream. To achieve this, Belmont will purchase a portfolio of SPDR® S&P 500® ETF's (SPY) and employ an options "covered call" writing strategy on the SPY. Under a covered call strategy an investor writes a call that is covered by an equivalent long position. It provides a small hedge on the ETF and allows the investor to earn premium income, in return for forfeiting potential upside appreciation.

Custom Solutions

Our Custom Solutions are bespoke solutions for client-specific objectives focused on income and risk management.

Single Stock/Portfolio Risk Management

Belmont provides concentrated equity holders with solutions designed to reduce a position's downside risk with potential to generate incremental yield and an opportunity to change the risk profile on an equity position without incurring a tax liability using:

- Dynamic Call Program - sell calls to enhance yield and/or structure the sale of shares.
- Put Purchase Program - buy puts to protect against declining share prices of shares.
- Collar Program - buy puts and sell calls to obtain costless (or reduced cost) protection with a capped upside.

Defined Outcome

Defined Outcome solutions enable investors to structure returns in a manner that best aligns with their goals and risk tolerance: lever upside participation, buffer downside participation, or protect principal.

Put Write

Put Write solutions seek to generate income via put writing on equity indexes. An underlying portfolio comprised of equities, fixed income, or cash is released by the client as "Collateral Backing". Management of the Collateral Backing is not part of the Put Write strategy. Therefore, the value of the Collateral Backing and any collateral income are not included in Put Write performance calculation. Belmont will invest with notional exposure up to the amount of Collateral Backing.

Index Solutions

Belmont Capital Group has designed first of their kind, systematically managed indexes, that offer investors income generation and tail risk protection opportunities.

- Rules based indexes offer investors an opportunity to generate income or protect their portfolios during tail risk events.
- Position entry and exit is systematically implemented for repeatability and scale.
- Risk is actively-managed in nature, but governed via predefined rules.
- Tracks U.S. equity markets.
- The Indexes use the 3-Month Treasury Constant Maturity Rate as collateral.
- Investors may choose to overlay the option component on existing portfolios.

Belmont U.S. Equity Put Write Index - seeks to generate income via put writing on U.S. equity markets.

- Collects option premium by selling out of the money put options.
- Multiple put structures are sold to diversify duration and strikes.

Belmont U.S. Equity Hedged Put Write Index - seeks to generate income via put spread writing on U.S. equity markets.

- Collects option premium by selling out of the money put spreads.
- Utilizes hedging components to reduce portfolio volatility.

Belmont U.S. Equity Enhanced Tail Risk Index - seeks to provide low cost tail risk protection via a combination of protective option purchases.

- Provides protection during periods of large, high velocity drawdowns in the market, by purchasing out of the money, protective options.
- Attempts to fully finance tail risk protection with income collected via put spread writing.

Belmont Theta Income Fund

Investment objectives for the Belmont Theta Income Fund are detailed in the Fund's Prospectus, which can be viewed online at www.BelmontCapFunds.com.

Risk of Loss

Belmont's suite of option-based strategies are focused on income and risk management. Although Belmont makes every effort to preserve each client's capital and achieve real growth of wealth, investing in the securities markets involves risk of loss that each client should be prepared to bear.

Risks Relating to Options Strategies

Options strategies carry significant risks. These can include loss of principal or more than the initial investment. The primary risks associated with options strategies are:

- **Use of Options.** Investing in options incurs more risk than directly investing in the underlying security and may not be suitable for all clients. Options strategies utilize multi-leg transactions, which will generate multiple commission charges that will impact overall performance and profitability. Short options spreads are utilized in several options strategies. For a short option spread position, the maximum gain is limited to the net premium received and the maximum loss is the difference between call strikes or put strikes, multiplied by 100, less the premium received. The client is also subject to the risk of failure of the exchanges on which the options trade, which might not perform their obligations. Options markets may become illiquid for various reasons, and the bid-offer spread (the difference between an option's buy and sell prices) can widen considerably. Consequently, Belmont may not be able to prematurely terminate a given position and realize the premiums collected, or any profits reflected in the pricing of such options.
- **Margin.** Belmont generally trades securities on margin. The custodian may change the margin requirements without notice to Belmont. If the client does not meet the margin requirements, Belmont may need to liquidate some or all of the investments in the client's account. This may have a negative impact on the performance of the client's account.
- **Use of Derivatives.** The risks posed by the use of derivatives include:
 - i. market risks (risk that the market value of the investment will decline);
 - ii. counter-party credit risk (risk that the counter-party to the transaction will default on its obligations);
 - iii. liquidity risks (risk that the instrument will not be readily marketable);
 - iv. valuation risks (risk that if an instrument is thinly traded, it may have only one pricing source);
 - v. legal risks (risk that a financial contract may be legally invalidated);
 - vi. operations risks (risk of inadequate controls, deficient procedures, human error, system failure or fraud);
 - vii. documentation risks (exposure to losses resulting from inadequate documentation);
 - viii. systemic risks (risk that financial difficulties faced by one market participant puts other participants and the overall financial system at risk); and
 - ix. settlement risks (risk that a party to a contract faces when it has performed its obligations under a contract but has not yet received value from its counterparty).
- **Lack of Diversification.** Options strategy accounts will not be diversified among a wide range of security types or sectors. This may result in greater fluctuations in value than a more broadly diversified portfolio.

The above list of risks is not intended to be an exhaustive list or an explanation of the risks involved in options strategies. Prospective clients should examine their investment objectives, financial resources, and risk tolerance to determine whether options strategies are appropriate for them.

Item 9: Disciplinary Information

There are no legal or disciplinary events that are material to the evaluation of our investment management business or the integrity of our management.

Item 10: Other Financial Industry Activities & Affiliations

Belmont is the investment adviser to the Belmont Theta Income Fund and receives advisory fees from the Fund. Management fees are waived with respect to client's accounts invested in the Fund, so that those clients do not pay two levels of fees to Belmont on those assets. Belmont nevertheless has an incentive to invest client's account assets in the Fund because higher asset levels in this fund lowers the expense ratios and may increase the visibility and create other marketing advantages.

The Fund was organized with the intent that it be managed by Belmont, and Belmont does not intend to cause the Fund to terminate its investment management relationship with Belmont absent Belmont's liquidation or bankruptcy. However, Belmont has a fiduciary duty to act in the best interest of the Fund, and investors in the Fund have the right to withdraw from the Fund at any time subject to any notice requirement or other withdrawal limitations described in the Prospectus and Statement of Additional Information.

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

An investment adviser is considered a fiduciary and our firm has a fiduciary duty to all clients. As a fiduciary, it is an investment adviser's responsibility to provide fair and full disclosure of all material facts and to act solely in the best interest of each of our clients at all times. Our fiduciary duty is the core underlying principle for our Code of Ethics, which includes: Personal Trading Policy and Insider Trading Policy. Upon employment and at least annually thereafter, all employees will sign an acknowledgement that they have read, understand, and agree to comply with our Code of Ethics. If a client or a potential client wishes to review our Code of Ethics in its entirety, a copy will be provided upon request by calling the telephone number on the Cover Page of this Form ADV Part 2.

Belmont anticipates that we will buy, sell, or hold securities in client accounts that are directly or indirectly held by employees of our firm. As a result, Belmont's employees and their family members, including any relative by blood or marriage living in the employee's household are required to follow our Personal Trading Policy. Employees of Belmont and their immediate family members sharing a household may trade for their own accounts¹ in securities which are recommended to and/or purchased for Belmont's clients. Our Personal Trading Policy is designed to avoid actual and potential conflicts of interest and assure that the personal securities transactions, activities, and interests of the employees and their family members will not interfere with (i) making decisions in the best interest of clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts.

When trading for personal security accounts, employees may have a conflict of interest if trading in the same securities as clients. As fiduciaries, Belmont must disclose and mitigate the risk of possible conflicts of interest through policies and procedures. Employees will place client interests ahead of their own interests, and will refrain from buying or selling the same "reportable" funds or securities prior to the

¹ For purposes of the policy, our employee's personal account generally includes any account (a) in the name of our employee, his/her spouse, his/her minor children or other dependents residing in the same household, or (b) for which our employee is a trustee or executor.

same transaction(s) for our clients during the same day. This risk is mitigated by Belmont conducting a coordinated review of personal security accounts and the accounts of the clients.

Our Personal Trading Policy includes provisions for monitoring employee transactions in order to reasonably prevent conflicts of interest between employees and our clients. Our Personal Trading Policy requires that all employees shall enable the delivery of daily electronic transactions data directly from their custodian(s), in addition to submission of a quarterly report to the Chief Compliance Officer of all personal securities transactions in which such employee has any direct or indirect beneficial ownership.

Our Insider Trading Policy provides generally that Belmont's employees may not buy or sell a security for themselves or others while in possession of material non-public information about the issuer, or communicate such material non-public information to others who have no official need to know. Our policy statement provides guidance on what is material non-public information and procedures for avoiding insider trading and in aiding in the prevention, detection and imposition of sanctions against insider trading.

Item 12: Brokerage Practices

Selecting a Brokerage Firm

Belmont does not have an affiliated broker, and our clients (other than Registered Investment Companies) have the discretion to select a brokerage firm for custody of securities, trade execution, clearance and settlement of transactions. Through their selection of a brokerage firm, our clients have made the determination of the brokers with whom orders for the purchase or sale of securities are placed for execution, and the commission rates at which such securities transactions are effected. Belmont's clients maintain relationships with these brokerage firms:

- Charles Schwab & Co.
- Fidelity Brokerage Services LLC
- Interactive Brokers
- Pershing, LLC
- TD Ameritrade

Belmont generally initiates trades simultaneously across applicable brokerage firms. A brokerage firm's ability to execute the trade could favorably or adversely affect a client's prices for their transactions relative to clients at other brokerage firms; however, the simultaneous trade initiation is intended in the long run to provide fair placement and execution to all brokerage firms. Circumstances may cause a particular brokerage firm to be unable to receive trade instructions; in such cases, we cause trades to be initiated simultaneously across all other brokerage firms, and continue to initiate the trade with the particular brokerage firm until the issue is resolved. And as a result, brokerage firms that are unable to receive trade instructions will receive different, and perhaps less favorable, prices for their transactions than they would have received had the brokerage firm received those instructions in the original trade initiation.

Charles Schwab & Co. and TD Ameritrade provide Asset-Based Pricing (ABP) fees which are in lieu of transaction-based commissions for brokerage services. ABP fees do not include Security and Exchange Commission and exchange fees, transfer taxes, redemption fees, margin interest, electronic

funds or wire transfer fees, and other similar costs or charges. ABP fee schedules are provided by independent custodians who act as the broker-dealer to effect transactions. Clients may receive ABP fees at these two brokerage firms.

Aggregation of Purchase or Sale

Belmont will aggregate ("block") trades where possible and when advantageous to clients. This blocking of trades permits the trading of aggregated blocks of securities composed of assets from multiple client accounts. Belmont believes that it can most effectively seek best execution for all its clients if it aggregates orders for clients in the manner that includes client accounts in which affiliated persons of Belmont have an investment interest. Belmont will typically aggregate trades among clients whose accounts can be traded at a given brokerage firm.

- Belmont shall not aggregate trades unless it believes such aggregation is consistent with its duty to seek best execution (which shall include best price) for its clients and is consistent with the terms of Belmont's investment advisory agreements.
- No account will be favored over any other account; and each account that participates in an aggregated order will participate at the average share price for transactions of such aggregated order in that security on a given business day, with transaction costs shared pro-rata basis.
- Belmont will compose, before entering an aggregated order, an Allocation Statement (trade allocation workbook) as to how the order will be allocated among the various accounts.
- If the aggregated order is filled in its entirety, it shall be allocated among the accounts in accordance with the Allocation Statement; if the order is partially filled, it shall be allocated pro-rata based on the Allocation Statement.
- Notwithstanding the foregoing, the order may be allocated on a basis different from that specified in the Allocation Statement if all accounts of clients whose orders are allocated receive fair and equitable treatment, and the reason for different allocation is explained in writing and is approved in writing by Belmont's compliance officer no later than one hour after the opening of the markets on the trading day following the day on which the order is executed.
- If an aggregated order is partially filled and allocated on a basis different from that specified in the Allocation Statement, no account that is benefited by such different allocation may effect any purchase or sale, for a reasonable period following the execution of the aggregated order, that would result in it receiving or selling more shares than the amount of shares it would have received or sold had the aggregated order been completely filled.
- Belmont's books and records will separately reflect, for each account of a client whose orders are aggregated, the securities held by, and bought and sold for each account.
- Funds and securities of clients whose orders are aggregated will be deposited with one or more banks or broker-dealers, and neither the clients' cash nor their securities will be held collectively for the clients any longer than is necessary to settle the purchase or sale in question on a delivery versus payment basis; cash or securities held collectively for clients will be delivered out to the bank or broker-dealer having custody of the client's account as soon as practicable following settlement.
- Belmont will receive no additional compensation of any kind as a result of the proposed procedure.
- Individual investment advice and treatment will be accorded to each client's account.

Belmont will allocate aggregated trades on an equitable basis, at or near the time of trade execution. Belmont will not allocate trades in such a way that any selected client accounts, or client accounts in which affiliated persons of Belmont have an investment interest, receive more favorable treatment than Belmont's other client's accounts.

Research and Services

Brokerage firms may make certain research and brokerage services available at no additional cost to Belmont, all of which qualify for the safe harbor exemption defined in Section 28(e) of the Securities Exchange Act of 1934. These services may be delivered directly from independent research companies, as selected by our firm (within specific parameters). Research products and services provided may include research reports on recommendations or other information about, particular companies or industries; economic surveys, data and analyses; financial publications; portfolio evaluation services; financial database software and services; computerized news and pricing services; quotation equipment for use in running software used in investment decision-making; and other products or services that provide lawful and appropriate assistance to our firm in the performance of our investment decision-making responsibilities.

Soft Dollars

Belmont does not have any soft-dollar arrangements and does not receive any soft-dollar benefits.

Item 13: Review of Accounts

While the underlying securities including derivative positions within the accounts are continually monitored, all accounts are reviewed at least quarterly. Accounts are reviewed in the context of each account's investment strategy. All accounts are reviewed by our Managing Partners: Daniel Beckwith and/or Stephen Solaka.

Clients receive from their selected brokerage firm monthly statements indicating the status of account investments as well as confirmation reports following any account trades.

Item 14: Client Referrals & Other Compensation

Referral Fees

Belmont does pay referral fees to independent persons or firms ("Promoters") for introducing clients to us in accordance with Rule §206(4)-1 of the Investment Advisers Act of 1940. Whenever we pay a referral fee, we require that the Promoter to provide the prospective client with a copy of this document (our Firm Brochure) and discloses the following information clearly and prominently at the time the endorsement is disseminated:

- That the Promoter is a person other than a current client or investor;
- That cash compensation was provided to the Promoter;
- The material terms of any compensation arrangement, including a description of the compensation provided or to be provided to the Promoter;
- A brief statement of any material conflicts of interest on the part of the Promoter resulting from the Belmont's relationship with the Promoter.

As a matter of firm practice, the investment management fees paid to Belmont by clients referred by Promoters are not increased as a result of any referral.

It is Belmont's policy not to accept or allow our employees to accept any form of compensation, including cash, sales awards or other prizes, from a non-client in conjunction with the investment management services that we provide to our clients.

Brokerage Firms

Belmont may receive an economic benefit from brokerage firms in the form of the research and services made available to us. The research and services which may assist our firm in the performance of our investment decision-making responsibilities, and the related safe harbor exemption defined in Section 28(e) of the Securities Exchange Act of 1934 are described above (*See Item 12 – Brokerage Practices*).

The availability of brokerage firm's research and services are not based on Belmont giving particular investment advice, such as buying particular securities for our clients.

Item 15: Custody

Client funds or securities are held in custody by a qualified custodian. All of our clients receive at least quarterly account statements directly from their custodians. Upon the opening of an account with a qualified custodian, we promptly notify the client in writing of the qualified custodian's contact information. If we decide to also send account statements to clients, such notice and account statements include a legend that recommends that the client compare the account statements received from the qualified custodian with those received from our firm.

Belmont does not have custody when Belmont has the limited authority to transfer a client's assets between the client's accounts maintained at one or more qualified custodians if the client has authorized Belmont in writing to make such transfers and a copy of that authorization is provided to the qualified custodians, specifying the client accounts maintained with qualified custodians.

We encourage our clients to raise any questions with us about the custody, safety or security of their assets. The custodian for your account(s) will send you independent account statements listing your account balance, transaction history and any fee debits or other fees taken out of your account.

Item 16: Investment Discretion

Clients provide our firm with investment discretion on their behalf, pursuant to an executed investment management agreement. By granting investment discretion, we are authorized to execute securities transactions, which securities are bought and sold, the total amount to be bought and sold, and the costs at which the transactions will be effected. Limitations may be imposed by the client in the form of specific constraints on any of these areas of discretion with our firm's written acknowledgement.

Item 17: Voting Client Securities

Belmont accepts proxy authority to vote client securities on a per agreement basis. Generally, Belmont does not accept proxy authority to vote client securities. In the general case, clients will receive proxies or other solicitations directly from their custodian or a transfer agent, and in the event that proxies are sent to Belmont, we will forward them to the client and ask the party who sent them to mail them directly to the client in the future. These clients may call, write or e-mail Belmont to discuss questions they may have about particular proxy votes or other solicitations.

Belmont has agreed to accept proxy authority to vote client securities for the Belmont Theta Income Fund. Ultimus Fund Solutions, LLC (the Fund's transfer agent, fund accountant and administrator) shall file an annual report on Form N-PX not later than August 31 of each year, containing Belmont's proxy voting record for the most recent twelve-month period ended June 30.

Item 18: Financial Information

Registered investment advisers are required to provide certain financial information or disclosures about their financial condition. We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to our clients. We do not take custody of client funds or securities. We have not been the subject of a bankruptcy proceeding. Under no circumstances does Belmont require or solicit payment of fees in excess of \$1,200 per client more than six months in advance of services rendered. Therefore, Belmont is not required to include a financial statement.



Part 2B of Form ADV: Brochure Supplement

March 2023

Belmont Capital Group
1875 Century Park East, Suite 1780
Los Angeles, CA 90067

Firm Contact:
Stephen J. Remboski, CFA
Chief Compliance Officer

Firm Website Address:
www.BelmontCapGroup.com

This brochure supplement provides information about Stephen Solaka and Daniel Beckwith. It supplements Belmont's accompanying Form ADV brochure.

If you have any questions about the contents of this brochure supplement, please contact us by telephone at (310) 203-2670 or email SRemboski@BelmontCapGroup.com.

Additional information about each of these individuals is available on the SEC's website at www.adviserinfo.sec.gov.

Education and Business Standards

Belmont Capital Group requires all employees involved in determining or giving investment advice to clients to have at least a baccalaureate degree and sufficient experience in investments as to demonstrate excellence in understanding and making judgments concerning investments.

Stephen Solaka's Biographical Information

Year of Birth

1975

Educational Background and Business Experience

Belmont Capital Group, Managing Partner and Co-Founder: 2010 to Present

He has over 20 years of financial market experience focusing on equity risk management, options and portfolio management. Stephen is frequently quoted by Barron's, The Wall Street Journal and Bloomberg regarding options and hedging.

Prior to founding Belmont, Stephen was a Director at Dorchester Capital Advisers, a fund of hedge funds focusing on equity and credit investments. Stephen previously advised clients at UBS Private Wealth Management, a division of UBS focused on families with over \$10 million in investable assets.

Prior to UBS, Stephen was a VP of Equity Derivatives at TD Options, a division of Toronto Dominion Bank. At TD he held responsibility for the firm's media and telecom options portfolio. This involved proprietary trading and market making on over 200 individual equities and sector ETFs. Stephen also held equity, ETF and index option market making positions at Bear Wagner Specialists and Stafford Trading. He was formerly a member of the Chicago Board Options Exchange, Chicago Board of Trade and American Stock Exchange.

Stephen holds a B.A. in Finance from the Eli Broad College of Business at Michigan State University.

Disciplinary Information

Mr. Solaka has not been involved in any legal or disciplinary events that would be material to a client's evaluation of Mr. Solaka or of Belmont.

Other Business Activities

Mr. Solaka is not engaged in any other investment related business, and does not receive compensation in connection with any business activity outside of Belmont.

Additional Compensation

Mr. Solaka does not receive economic benefits from any person or entity other than Belmont in connection with the provision of investment advice to clients.

Supervision

As Belmont's Co-Founder, Mr. Solaka maintains ultimate responsibility for the company's investment and operations decisions, along with Daniel Beckwith, Belmont's other Co-Founder. Stephen Remboski, Chief Compliance Officer, has responsibility for administering our firm's compliance with the Investment Advisers Act of 1940 requirements. Mr. Remboski is responsible for all compliance and supervisory functions. Mr. Remboski has been empowered by Belmont with full responsibility and authority to develop and enforce appropriate policies and procedures for Belmont. These policies and procedures are reasonably designed to prevent violation of federal and/or state securities laws. Any of these individuals can be reached directly by calling the telephone number on the cover of this brochure supplement.

Daniel Beckwith's Biographical Information

Year of Birth

1976

Educational Background and Business Experience

Belmont Capital Group, Managing Partner and Co-Founder: 2010 to Present

He is responsible for quantitative modeling, trade execution and portfolio risk management at the firm.

Daniel previously advised high-net worth families at Wells Fargo Advisers and Merrill Lynch. Prior to joining Merrill Lynch, he was a senior trader at Wolverine Trading, one of the largest option market makers in the world. Daniel was a member of Wolverine's index option market making group where he was responsible for trading, risk management and pricing of Nasdaq 100 ETF and index options. He was also an ETF exchange specialist in the OEF product on the Chicago Board Options Exchange.

Daniel holds a B.A. in Accounting from the Eli Broad College of Business at Michigan State University. He is also a CERTIFIED FINANCIAL PLANNER™ professional.

Certified Financial Planner Board of Standards Inc. owns the certification marks CFP® and CERTIFIED FINANCIAL PLANNER™ in the U.S., which it awards to individuals who successfully complete CFP Board's initial and ongoing certification requirements.

Disciplinary Information

Mr. Beckwith has not been involved in any legal or disciplinary events that would be material to a client's evaluation of Mr. Beckwith or of Belmont.

Other Business Activities

Mr. Beckwith is not engaged in any other investment related business and does not receive compensation in connection with any business activity outside of Belmont.

Additional Compensation

Mr. Beckwith does not receive economic benefits from any person or entity other than Belmont in connection with the provision of investment advice to clients.

Supervision

As Belmont's Co-Founder, Mr. Beckwith maintains ultimate responsibility for the company's investment and operations decisions, along with Stephen Solaka, Belmont's other Co-Founder. Stephen Remboski, Chief Compliance Officer, has responsibility for administering our firm's compliance with the Investment Advisers Act of 1940 requirements. Mr. Remboski is responsible for all compliance and supervisory functions. Mr. Remboski has been empowered by Belmont with full responsibility and authority to develop and enforce appropriate policies and procedures for Belmont. These policies and procedures are reasonably designed to prevent violation of federal and/or state securities laws. Any of these individuals can be reached directly by calling the telephone number on the cover of this brochure supplement.

Dylan Barlow's Biographical Information

Year of Birth

1989

Educational Background and Business Experience

Belmont Capital Group, Vice President: 2019 to Present

He is responsible for quantitative modeling, trade execution and portfolio risk management at the firm.

Dylan has of investment industry experience focusing on equity derivative sales, trading and operations. Dylan began his career with Bank of America Merrill Lynch where he was a member of Delta One trading desk. His responsibilities included enhancing the desk's trading capabilities and managing daily risk for the equity swaps business. Most recently, Dylan was responsible for marketing and distribution of Bank of America's Delta One trading platform on the west coast.

Dylan holds B.S. in Business Administration from University of North Carolina at Chapel Hill.

Disciplinary Information

Mr. Barlow has not been involved in any legal or disciplinary events that would be material to a client's evaluation of Mr. Barlow or of Belmont.

Other Business Activities

Mr. Barlow is not engaged in any other investment related business, and does not receive compensation in connection with any business activity outside of Belmont.

Additional Compensation

Mr. Barlow does not receive economic benefits from any person or entity other than Belmont in connection with the provision of investment advice to clients.

Supervision

Stephen Remboski, Chief Compliance Officer, has responsibility for administering our firm's compliance with the Investment Advisers Act of 1940 requirements. Mr. Remboski is responsible for all compliance and supervisory functions. Mr. Remboski has been empowered by Belmont with full responsibility and authority to develop and enforce appropriate policies and procedures for Belmont. These policies and procedures are reasonably designed to prevent violation of federal and/or state securities laws. Any of these individuals can be reached directly by calling the telephone number on the cover of this brochure supplement.