



## **CONSTITUTION CAPITAL**

### **Constitution Capital, LLC d/b/a Constitution Investment Advisory and Portfolio Management**

### **Form ADV Part 2A – Disclosure Brochure**

**Effective: December 19, 2023**

This Form ADV Part 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of Constitution Capital, LLC d/b/a Constitution Investment Advisory and Portfolio Management (“CIAPM” or the “Advisor”). If you have any questions about the content of this Disclosure Brochure, please contact the Advisor at (475) 269-3200 or by email at [info@constitutioncapitalllc.com](mailto:info@constitutioncapitalllc.com).

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

Additional information about CIAPM and its Advisory Persons is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor’s firm name or CRD# 310378.

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## Item 2 – Material Changes

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Form ADV 2 is divided into two parts: *Part 2A (the "Disclosure Brochure")* and *Part 2B (the "Brochure Supplement")*. The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about the Advisory Persons of CIAPM. For convenience, the Advisor has combined these documents into a single disclosure document.

CIAPM believes that communication and transparency are the foundation of its relationship with clients and will continually strive to provide you with complete and accurate information at all times. CIAPM encourages all current and prospective clients to read this Disclosure Brochure and discuss any questions you may have with the Advisor.

### Material Changes

There have been no material changes to this Disclosure Brochure since the last filing and distribution to Clients.

### Future Changes

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

At any time, you may view the current Disclosure Brochure online at the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor's firm name or CRD# 310378. You may also request a copy of this Disclosure Brochure at any time by contacting the Advisor at (475) 269-3200 or by email at [info@constitutioncapitalllc.com](mailto:info@constitutioncapitalllc.com).

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## Item 4 – Advisory Services

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### A. Firm Information

Constitution Capital LLC, d/b/a Constitution Investment Advisory and Portfolio Management (“CIAPM” or the “Advisor”) is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). The Advisor is organized as a Limited Liability Company (“LLC”) under the laws of the State of Connecticut. CIAPM was founded in January 2007 and became a registered investment advisor in September 2020. CIAPM is owned and operated by Anthony J. Bavedas, Jr., CFP® (President and Senior Portfolio Manager) and Gregory J. Bavedas, CES™ (Senior Vice President, Managing Director, and Chief Compliance Officer). This Disclosure Brochure provides information regarding the qualifications, business practices, and advisory services provided by CIAPM.

### B. Advisory Services Offered

CIAPM offers wealth management services which include investment management, financial planning, and/or other advisory services to individuals, high-net-worth individuals, trusts, estates, and charitable organizations (each referred to as a “Client”).

The Advisor serves as a fiduciary to Clients, as defined under the applicable laws and regulations. As a fiduciary, the Advisor upholds a duty of loyalty, fairness, and good faith toward each Client and seeks to mitigate potential conflicts of interest. CIAPM's fiduciary commitment is further described in the Advisor's Code of Ethics. For more information regarding the Code of Ethics, please see Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.

#### Wealth Management Services

CIAPM provides customized wealth management solutions for its Clients. This is achieved through continuous personal Client contact and interaction while providing discretionary investment management, financial planning, and related advisory services.

*Investment Management Services* – CIAPM works closely with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to create a portfolio strategy. CIAPM will then construct an investment portfolio consisting of exchange-traded funds (“ETFs”), open-end mutual funds, individual stocks, individual bonds, and closed-end mutual funds. The Advisor may also utilize covered options, limited partnerships, and/or other types of investments, as appropriate, to meet the needs of the Client. The Advisor may retain certain types of investments based on a Client's legacy investments based on portfolio fit and/or tax considerations.

CIAPM's investment approach is primarily long-term focused, but the Advisor may buy, sell, or re-allocate positions that have been held for less than one year to meet the objectives of the Client or due to market conditions. CIAPM will construct, implement and monitor the portfolio to ensure it meets the goals, objectives, circumstances, and risk tolerance agreed to by the Client. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to acceptance by the Advisor.

CIAPM evaluates and selects investments for inclusion in Client portfolios only after applying its internal due diligence process. CIAPM may recommend, on occasion, redistributing investment allocations to diversify the portfolio. CIAPM may recommend specific positions to increase sector or asset class weightings. The Advisor may recommend employing cash positions as a possible hedge against market movement. CIAPM may recommend selling positions for reasons that include but are not limited to harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position[s] in the portfolio, change in risk tolerance of the Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client's risk tolerance.

At no time will CIAPM accept or maintain custody of a Client's funds or securities, except for the limited authority as outlined in Item 15 – Custody. All Client assets will be managed within the designated account[s] at the Custodian, pursuant to the terms of the advisory agreement. Please see Item 12 – Brokerage Practices.

*Retirement Accounts* – When the Advisor provides investment advice to Clients regarding ERISA retirement accounts or individual retirement accounts (“IRAs”), the Advisor is a fiduciary within the meaning of Title I of the Employee Retirement Income Security Act (“ERISA”) and/or the Internal Revenue Code (“IRC”), as applicable, which are laws governing retirement accounts. When deemed to be in the Client’s best interest, the Advisor will provide investment advice to the Client regarding a distribution from an ERISA retirement account or to roll over the assets to an IRA, or recommend a similar transaction, including rollovers from one ERISA-sponsored Plan to another, one IRA to another IRA, or from one type of account to another account (e.g., commission-based account to fee-based account). Such a recommendation creates a conflict of interest if the Advisor earns a new (or increases its current) advisory fee as a result of the transaction. No client is under any obligation to roll over a retirement account to an account managed by the Advisor.

*Financial Planning Services* – CIAPM will typically provide a variety of financial planning and consulting services to Clients as a component of wealth management services. Services are offered in several areas of a Client’s financial situation, depending on their goals and objectives. Generally, such financial planning services involve preparing a formal financial plan or rendering a specific financial consultation based on the Client’s financial goals and objectives. This planning or consulting may encompass one or more areas of need, including but not limited to investment planning, retirement planning, personal savings, education savings, and/or other areas of a Client’s financial situation.

A financial plan developed for, or financial consultation rendered to the Client will usually include general recommendations for a course of activity or specific actions to be taken by the Client. For example, recommendations may be made that the Client start or revise their investment programs, commence or alter retirement savings, and establish education savings and/or charitable giving programs.

CIAPM may also refer Clients to an accountant, attorney, or other specialists as appropriate for their unique situation. For certain financial planning engagements, the Advisor will provide a written summary of the Client’s financial situation, observations, and recommendations.

Financial planning and consulting recommendations pose a conflict between the interests of the Advisor and the interests of the Client. For example, the Advisor has an incentive to recommend that Clients engage the Advisor for investment management services or to increase the level of investment assets with the Advisor, as it would increase the amount of advisory fees paid to the Advisor. Clients are not obligated to implement any recommendations made by the Advisor or maintain an ongoing relationship with the Advisor. If the Client elects to act on any of the recommendations made by the Advisor, the Client is under no obligation to implement the transaction through the Advisor.

### **C. Client Account Management**

Prior to engaging CIAPM to provide advisory services, each Client is required to enter into an agreement with the Advisor that define the terms, conditions, authority, and responsibilities of the Advisor and the Client. These services may include:

- Establishing an Investment Strategy – CIAPM, in connection with the Client, will develop a strategy that seeks to achieve the Client’s goals and objectives.
- Asset Allocation – CIAPM will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation, and tolerance for risk for each Client.
- Portfolio Construction – CIAPM will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – CIAPM will provide investment management and ongoing oversight of the Client’s investment portfolio.

### **D. Wrap Fee Programs**

CIAPM does not manage or place Client assets into a wrap fee program. Investment management services are provided directly by CIAPM.

## **E. Assets Under Management**

As of December 31, 2022, CIAPM manages \$179,044,198 in Client assets, all of which are managed on a discretionary basis. Clients may request more current information at any time by contacting the Advisor.

## **Item 5 – Fees and Compensation**

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The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client engaging the Advisor for services described herein shall be required to enter into a written agreement with the Advisor.

### **A. Fees for Advisory Services**

Wealth management fees are paid quarterly, at the end of each calendar quarter, pursuant to the terms of the wealth management agreement. Wealth management fees are based on the market value of assets under management at the end of the quarter. Wealth management fees range from 0.50% to 1.40% annually based on several factors, including the scope and complexity of the services to be provided, the level of assets to be managed, and the overall relationship with the Advisor. Relationships with multiple objectives, specific reporting requirements, portfolio restrictions, and other complexities may be charged a higher fee.

The wealth management fee in the first quarter of service is prorated from the inception date of the account[s] to the end of the first quarter. Fees may be negotiable at the sole discretion of the Advisor. The Client's fees will take into consideration the aggregate assets under management with the Advisor. All securities held in accounts managed by CIAPM will be independently valued by the Custodian. The Advisor will conduct periodic reviews of the Custodian's valuations.

The Advisor's fee is exclusive of and in addition to any applicable securities transaction and custody fees and other related costs and expenses described in Item 5.C. below, which may be incurred by the Client. The Advisor's recommended Custodian charges an annual custody fee of 0.04% or 0.01% per quarter on assets held in the Client's account[s]. The Custodian deducts this fee directly from the Client's account[s], as authorized by the Client on the separate account forms provided by the Custodian. The Advisor shall not receive any portion of these commissions, fees, and costs.

### **B. Fee Billing**

Wealth management fees are calculated by the Advisor or its delegate and deducted from the Client's account[s] at the Custodian. The amount due is calculated by applying the quarterly rate (annual rate divided by 4) to the total assets under management with CIAPM at the end of the quarter. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting the deduction of the wealth management fee. Clients are urged to also review and compare the statement provided by the Advisor to the brokerage statement from the Custodian, as the Custodian does not perform a verification of fees. Clients provide written authorization permitting advisory fees to be deducted by CIAPM to be paid directly from their account[s] held by the Custodian as part of the wealth management agreement and separate account forms provided by the Custodian.

### **C. Other Fees and Expenses**

Clients may incur certain fees or charges imposed by third parties, other than CIAPM, in connection with investments made on behalf of the Client's account[s]. The Client is responsible for all custody and securities execution fees charged by the Custodian, if applicable. The Advisor's recommended Custodian does not charge securities transaction fees for ETF and equity trades in a Client's account, provided that the account meets the terms and conditions of the Custodian's brokerage requirements. However, the Custodian typically charges for mutual funds and other types of investments. The fees charged by CIAPM are separate and distinct from these custody and execution fees.

In addition, all fees paid to CIAPM for advisory services are separate and distinct from the expenses charged by mutual funds and ETFs to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage, and account reporting), and a possible distribution fee. A Client may be able to invest in these products directly, without the services of CIAPM, but would not receive the services provided by CIAPM, which are designed, among other things, to assist the Client in determining which



products or services are most appropriate for each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by CIAPM to fully understand the total fees to be paid. Please refer to Item 12 – Brokerage Practices for additional information.

#### **D. Advance Payment of Fees and Termination**

CIAPM is compensated for its wealth management services following the end of the quarter after services are rendered. Either party may terminate the wealth management agreement, at any time, by providing advance written notice to the other party. The Client may also terminate the wealth management agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination, and such fees will be due and payable by the Client. The Client's wealth management agreement with the Advisor is non-transferable without the Client's prior consent.

#### **E. Compensation for Sales of Securities**

CIAPM does not buy or sell securities to earn commissions and does not receive any compensation for securities transactions in any Client account other than the wealth management fees noted above.

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

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CIAPM does not charge performance-based fees for its advisory services. The fees charged by CIAPM are as described in Item 5 above and are not based upon the capital appreciation of the funds or securities held by any Client. CIAPM does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

### **Item 7 – Types of Clients**

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CIAPM offers wealth management and related advisory services to individuals, high-net-worth individuals, trusts, estates, and charitable organizations. CIAPM generally does not impose a minimum relationship size.

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

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#### **A. Methods of Analysis**

CIAPM employs fundamental and technical analysis methods in developing investment strategies for its Clients. Research and analysis from CIAPM are derived from numerous sources, including financial media companies, third-party research materials, Internet sources, and reviews of company activities, including annual reports, prospectuses, press releases, and research prepared by others.

*Fundamental analysis* utilizes economic and business indicators as investment selection criteria. This criterion generally consists of ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

*Technical analysis* involves the analysis of past market data rather than specific company data in determining the recommendations made to clients. Technical analysis may involve the use of charts to identify market patterns and trends, which may be based on investor sentiment rather than the fundamentals of the company. The primary risk in using technical analysis is that spotting historical trends may not help to predict such trends in the future. Even if the trend will eventually reoccur, there is no guarantee that CIAPM will be able to accurately predict such a reoccurrence.

As noted above, CIAPM generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. CIAPM will typically hold all or a portion of a security for more than a year but may hold for shorter

periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, CIAPM may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector, or asset class.

## **B. Risk of Loss**

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. CIAPM will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

While the methods of analysis help the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in these methods of analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk, and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account[s]. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals, or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Clients' accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process. Following are some of the risks associated with the Advisor's investment approach:

### Market Risks

The value of a Client's holdings may fluctuate in response to events specific to companies or markets, as well as economic, political, or social events in the U.S. and abroad. This risk is linked to the performance of the overall financial markets.

### ETF Risks

The performance of ETFs is subject to market risk, including the possible loss of principal. The price of the ETFs will fluctuate with the price of the underlying securities that make up the funds. In addition, ETFs have a trading risk based on the loss of cost efficiency if the ETFs are traded actively and a liquidity risk if the ETFs have a large bid-ask spread and low trading volume. The price of an ETF fluctuates based upon the market movements and may dissociate from the index being tracked by the ETF or the price of the underlying investments. An ETF purchased or sold at one point in the day may have a different price than the same ETF purchased or sold a short time later.

### Bond ETFs

Bond ETFs are subject to specific risks, including the following: (1) interest rate risks, i.e., the risk that bond prices will fall if interest rates rise, and vice versa; the risk depends on two things, the bond's time to maturity, and the coupon rate of the bond. (2) reinvestment risk, i.e., the risk that any profit gained must be reinvested at a lower rate than was previously being earned, (3) inflation risk, i.e., the risk that the cost of living and inflation increase at a rate that exceeds the income investment thereby decreasing the investor's rate of return, (4) credit default risk, i.e., the risk associated with purchasing a debt instrument which includes the possibility of the company defaulting on its repayment obligation, (5) rating downgrades, i.e., the risk associated with a rating agency's downgrade of the company's rating which impacts the investor's confidence in the company's ability to repay its debt and (6) Liquidity Risks, i.e., the risk that a bond may not be sold as quickly as there is no readily available market for the bond.

### Mutual Fund Risks



The performance of mutual funds is subject to market risk, including the possible loss of principal. The price of the mutual funds will fluctuate with the value of the underlying securities that make up the funds. The price of a mutual fund is typically set daily; therefore, a mutual fund purchased at one point in the day will typically have the same price as a mutual fund purchased later that same day.

#### Options Contracts

Investments in options contracts have the risk of losing value in a relatively short period of time. Options contracts are leveraged instruments that allow the holder of a single contract to control many shares of an underlying stock. This leverage can compound gains or losses.

#### Margin Borrowings

The use of short-term margin borrowings may result in certain additional risks to a Client. For example, if securities pledged to brokers to secure a Client's margin accounts decline in value, the Client could be subject to a "margin call," pursuant to which it must either deposit additional funds with the broker or be the subject of mandatory liquidation of the pledged securities to compensate for the decline in value.

#### Alternative Investments (Limited Partnerships)

The performance of alternative investments (limited partnerships) can be volatile and may have limited liquidity. An investor could lose all or a portion of their investment. Such investments often have concentrated positions and investments that may carry higher risks. Clients should only have a portion of their assets in these investments.

**Past performance is not a guarantee of future returns. Investing in securities and other investments involves a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.**

### **Item 9 – Disciplinary Information**

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**There are no legal, regulatory, or disciplinary events involving CIAPM management person[s].** CIAPM values the trust Clients place in the Advisor. The Advisor encourages Clients to perform the requisite due diligence on any advisor or service provider that the Client engages. The backgrounds of the Advisor or Advisory Persons are available on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor's firm name or CRD# 310378.

### **Item 10 – Other Financial Industry Activities and Affiliations**

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The sole business of CIAPM and its owner is to provide advisory services to its Clients. Neither CIAPM nor its Advisory Persons are involved in other business endeavors. CIAPM does not maintain any affiliations with other firms, other than contracted service providers, to assist with the servicing of its Client's accounts.

### **Item 11 – Code of Ethics, Participation or Interest in Client Transactions, and Personal Trading**

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#### **A. Code of Ethics**

CIAPM has implemented a Code of Ethics (the "Code") that defines the Advisor's fiduciary commitment to each Client. This Code applies to all persons associated with CIAPM ("Supervised Persons"). The Code was developed to provide general ethical guidelines and specific instructions regarding the Advisor's duties to each Client. CIAPM and its Supervised Persons owe a duty of loyalty, fairness, and good faith towards each Client. It is the obligation of CIAPM's Supervised Persons to adhere not only to the specific provisions of the Code but also to the general principles that guide the Code. The Code covers a range of topics that address employee ethics and conflicts of interest. To request a copy of the Code, please contact the Advisor at (475) 269-3200 or by email at [info@constitutioncapitalllc.com](mailto:info@constitutioncapitalllc.com).

#### **B. Personal Trading with Material Interest**

CIAPM allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. CIAPM does not act as a principal in any transactions. In addition, the Advisor

does not act as the general partner of a fund or advise an investment company. CIAPM does not have a material interest in any securities traded in Client accounts.

### **C. Personal Trading in Same Securities as Clients**

CIAPM allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities that are recommended (purchase or sell) to Clients presents a conflict of interest that, as fiduciaries, must be disclosed to Clients and mitigated through policies and procedures. As noted above, the Advisor has adopted the Code to address insider trading (material, nonpublic information controls), gifts and entertainment, outside business activities, and personal securities reporting. When trading for personal accounts, Supervised Persons have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can be violated if personal trades are made with more advantageous terms than Client trades or by trading based on material, nonpublic information. This risk is mitigated by CIAPM requiring reporting of personal securities trades by its Supervised Persons for review by the Chief Compliance Officer ("CCO") or delegate. The Advisor has also adopted written policies and procedures to detect the misuse of material, nonpublic information.

### **D. Personal Trading at Same Time as Client**

While CIAPM allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades are typically aggregated with Client orders or traded afterward. **At no time will CIAPM, or any Supervised Person of CIAPM, transact in any security to the detriment of any Client.**

## **Item 12 – Brokerage Practices**

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### **A. Recommendation of Custodian[s]**

CIAPM does not have discretionary authority to select the broker-dealer/custodian for custody and execution services. The Client will engage the broker-dealer/custodian (herein the "Custodian") to safeguard Client assets and authorize CIAPM to direct trades to the Custodian as agreed upon in the wealth management agreement. Further, CIAPM does not have the discretionary authority to negotiate commissions on behalf of Clients on a trade-by-trade basis.

Where CIAPM does not exercise discretion over the selection of the Custodian, it may recommend the Custodian to Clients for custody and execution services. Clients are not obligated to use the Custodian recommended by the Advisor and will not incur any extra fee or cost associated with using a custodian not recommended by CIAPM. However, if the recommended Custodian is not engaged, the Advisor may be limited in the services it can provide. CIAPM may recommend the Custodian based on criteria such as, but not limited to, the reasonableness of commissions charged to the Client, services made available to the Client, and its reputation and/or the location of the Custodian's offices. CIAPM will generally recommend that Clients establish their account[s] at Fidelity Clearing and Custody Solutions and related divisions and entities of Fidelity Investments, Inc., including National Financial Services, LLC, and Fidelity Brokerage Services, LLC (collectively "Fidelity"), a FINRA-registered broker-dealer and member SIPC. Fidelity will serve as the Client's "qualified custodian." CIAPM maintains an institutional relationship with Fidelity, whereby the Advisor receives economic benefits from Fidelity. Please see Item 14 below.

CIAPM has established an institutional relationship with Fidelity to assist the Advisor in managing Client account[s]. Access to the Fidelity platform is provided at no charge to the Advisor. The Fidelity platform includes brokerage, custody, administrative support, record keeping, technology, and related services designed to support registered investment advisors like CIAPM in serving Clients. These services are intended to serve the best interests of the Advisor's Clients.

Fidelity may charge brokerage commissions (securities transaction fees) for effecting certain securities transactions. Fidelity enables the Advisor to obtain certain no-load mutual funds without securities transaction fees and other no-load funds at nominal transaction charges. Fidelity's commission rates are generally considered discounted from customary retail commission rates. However, the commissions and transaction fees charged by Fidelity may be higher or lower than those charged by other custodians and broker-dealers. Please see Item 14 below for additional information.

Following are additional details regarding the brokerage practices of the Advisor:

1. **Soft Dollars** – Soft dollars are revenue programs offered by broker-dealers/custodians whereby an advisor enters into an agreement to place security trades with a broker-dealer/custodian in exchange for research and other services. **CIAPM does not participate in soft dollar programs sponsored or offered by any broker-dealer/custodian. However, the Advisor receives certain economic benefits from the Custodian. Please see Item 14 below.**
2. **Brokerage Referrals** – CIAPM does not receive any compensation from any third party in connection with the recommendation for establishing an account.
3. **Directed Brokerage** – All Clients are serviced on a “directed brokerage basis,” where CIAPM will place trades within the established account[s] at the Custodian designated by the Client. Further, all Client accounts are traded within their respective account[s]. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor’s own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client’s account[s]). CIAPM will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the Custodian.

## **B. Aggregating and Allocating Trades**

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of the order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the Custodian. CIAPM will execute its transactions through the Custodian as authorized by the Client. CIAPM may aggregate orders in a block trade or trades when securities are purchased or sold through the Custodian for multiple (discretionary) accounts on the same trading day. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage any particular Client’s accounts.

## **Item 13 – Review of Accounts**

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### **A. Frequency of Reviews**

Securities in Client accounts are monitored on a regular and continuous basis by Greg Bavedas, the CCO of CIAPM. Formal reviews are generally conducted at least annually or more frequently depending on the needs of the Client.

### **B. Causes for Reviews**

In addition to the investment monitoring noted in Item 13.A., each Client account shall be reviewed at least annually. Reviews may be conducted more frequently at the Client’s request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client’s financial situation, and/or large deposits or withdrawals in the Client’s account[s]. The Client is encouraged to notify CIAPM if changes occur in the Client’s personal financial situation that might adversely affect the Client’s investment plan. Additional reviews may be triggered by material market, economic or political events.

### **C. Review Reports**

The Client will receive brokerage statements no less than quarterly from the Custodian. These brokerage statements are sent directly from the Custodian to the Client. The Client may also establish electronic access to the Custodian’s website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions, and fees relating to the Client’s account[s]. The Advisor may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

## **Item 14 – Client Referrals and Other Compensation**

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### **A. Compensation Received by CIAPM**

CIAPM is a fee-based advisory firm that is compensated solely by its Clients and not from any investment product. CIAPM does not receive commissions or other compensation from product sponsors, broker-dealers, or any unrelated third party. CIAPM may refer Clients to various unaffiliated, non-advisory professionals (e.g., attorneys, accountants, estate planners) to provide certain financial services necessary to meet the goals of its Clients. Likewise, CIAPM may receive non-compensated referrals of new Clients from various third parties.

### Participation in the Institutional Advisor Platform

As noted in item 12, CIAPM has established an institutional relationship with Fidelity to assist the Advisor in managing Client account[s]. As part of the arrangement, Fidelity also makes available to the Advisor, at no additional charge to the Advisor, certain research and brokerage services, including research services obtained by Fidelity directly from independent research companies. The Advisor may also receive additional services and support from Fidelity. As a result of receiving such services for no additional cost, the Advisor may have an incentive to continue to use or expand the use of Fidelity's services. The Advisor examined this conflict of interest when it chose to enter into the relationship with Fidelity and has determined that the relationship is in the best interests of the Advisor's Clients and satisfies its Client obligations, including its duty to seek best execution. Please see Item 12 above.

The Advisor receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets at Fidelity. The software and related systems support may benefit the Advisor but not its Clients directly. The Advisor endeavors at all times to put the interests of its Clients first in fulfilling its duties to its Clients. However, Clients should be aware that the receipt of economic benefits from a Custodian creates a conflict of interest since these benefits may influence the Advisor's recommendation of this Custodian over one that does not furnish similar software, systems support, or services.

### **B. Compensation for Client Referrals**

Certain Clients may be referred to the Advisor by either an affiliated or unaffiliated party (herein "Promoter") and receive, directly or indirectly, compensation for the Client referral. In such instances, the Advisor will compensate the Promoter a fee in accordance with Rule 206(4)-1 of the Advisers Act and any corresponding state securities requirements. Any such compensation shall be paid solely from the investment advisory fees earned by the Advisor and shall not result in any additional charge to the Client.

## **Item 15 – Custody**

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CIAPM does not accept or maintain custody of any Client accounts except for the authorized deduction of the Advisor's fees. All Clients must place their assets with a "qualified custodian." Clients are required to engage the Custodian to retain their funds and securities and direct CIAPM to utilize that Custodian for the Client's security transactions. Clients should review statements provided by the Custodian and compare them to any reports provided by CIAPM to ensure accuracy, as the Custodian does not perform this review. For more information about custodians and brokerage practices, see Item 12 – Brokerage Practices.

If the Client gives the Advisor authority to move money from one account to another account, the Advisor may have custody of those assets. In order to avoid additional regulatory requirements, the Custodian and the Advisor have adopted safeguards to ensure that the money movements are completed in accordance with the Client's instructions.

## **Item 16 – Investment Discretion**

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CIAPM 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 CIAPM. 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 a wealth management agreement containing all applicable

limitations to such authority. All discretionary trades made by CIAPM will be in accordance with each Client's investment objectives and goals.

### **Item 17 – Voting Client Securities**

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CIAPM does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. The Advisor will assist in answering questions relating to proxies; however, the Client retains the sole responsibility for proxy decisions and voting.

### **Item 18 – Financial Information**

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Neither CIAPM nor its management has any adverse financial situations that would reasonably impair the ability of CIAPM to meet all obligations to its Clients. Neither CIAPM nor any of its Advisory Persons have been subject to a bankruptcy or financial compromise. CIAPM is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect advance fees of \$1,200 or more for services to be performed six months or more in the future.



**CONSTITUTION  
CAPITAL**

**Constitution Capital, LLC  
d/b/a Constitution Investment Advisory and Portfolio  
Management**

**Form ADV Part 2B – Brochure Supplement**

**for**

**Anthony J. Bavedas, Jr., CFP®  
President and Senior Portfolio Manager**

**Effective: December 19, 2023**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Anthony J. Bavedas, Jr., CFP® (CRD# 15235), in addition to the information contained in the Constitution Capital, LLC (“CIAPM” or the “Advisor,” CRD# 310378) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the CIAPM Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (475) 269-3200 or by email, [info@constitutioncapitalllc.com](mailto:info@constitutioncapitalllc.com).

Additional information about Mr. Bavedas is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his individual CRD# 15235.



## Item 2 – Educational Background and Business Experience

Anthony J. Bavedas, Jr., CFP®, is dedicated to advising Clients of CIAPM as its President and Senior Portfolio Manager as well as the Chief Compliance Officer. Mr. Bavedas earned a Bachelor of Science degree in Economics from the University of Bridgeport in 1967. Additional information regarding Mr. Bavedas's employment history is included below.

### Employment History:

President and Senior Portfolio Manager, Constitution Capital, LLC	10/2020 to Present
Registered Representative, Wells Fargo Clearing Services, LLC	05/2013 to 10/2020
Financial Advisor, Morgan Stanley Smith Barney	06/2009 to 06/2013

### Certified Financial Planner™ (“CFP®”)

The Certified Financial Planner™, CFP®, and federally registered CFP® (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner™ Board of Standards, Inc. (“CFP® Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 95,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- *Education* – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP® Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP® Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- *Examination* – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real-world circumstances;
- *Experience* – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- *Ethics* – Agree to be bound by the CFP® Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- *Continuing Education* – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- *Ethics* – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to the CFP® Board's enforcement process, which could result in suspension or permanent revocation of their CFP®.

### **Item 3 – Disciplinary Information**

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***There are no legal, civil, or disciplinary events to disclose regarding Mr. Bavedas.*** Mr. Bavedas has never been involved in any regulatory, civil, or criminal action. There have been no client complaints, lawsuits, arbitration claims, or administrative proceedings against Mr. Bavedas.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil, or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement, or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair, or unethical practices. ***As previously noted, there are no legal, civil, or disciplinary events to disclose regarding Mr. Bavedas.***

However, the Advisor encourages you to independently view the background of Mr. Bavedas on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his individual CRD# 15235.

### **Item 4 – Other Business Activities**

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Mr. Bavedas is dedicated to the advisory activities of CIAPM's Clients. Mr. Bavedas does not have any other business activities.

### **Item 5 – Additional Compensation**

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Mr. Bavedas is dedicated to the advisory activities of CIAPM's Clients. Mr. Bavedas does not receive any additional forms of compensation.

### **Item 6 – Supervision**

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Mr. Bavedas serves as the President and Senior Portfolio Manager and is supervised by Greg Bavedas, the Chief Compliance Officer. Greg Bavedas can be reached at (475) 269-3200.

CIAPM has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of CIAPM. Further, CIAPM is subject to regulatory oversight by various agencies. These agencies require registration by CIAPM and its Supervised Persons. As a registered entity, CIAPM is subject to examinations by regulators, which may be announced or unannounced. CIAPM is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.



**CONSTITUTION  
CAPITAL**

**Constitution Capital, LLC  
d/b/a Constitution Investment Advisory and Portfolio  
Management**

**Form ADV Part 2B – Brochure Supplement**

**for**

**Gregory J. Bavedas, CES™  
Senior Vice President, Managing Director, and Chief Compliance Officer**

**Effective: December 19, 2023**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Gregory J. Bavedas, CES™ (CRD# 4513282), in addition to the information contained in the Constitution Capital, LLC (“CIAPM” or the “Advisor,” CRD# 310378) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the CIAPM Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (475) 269-3200 or by email, [info@constitutioncapitalllc.com](mailto:info@constitutioncapitalllc.com).

Additional information about Mr. Bavedas is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 4513282.

## Item 2 – Educational Background and Business Experience

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Gregory J. Bavedas, CES<sup>TM</sup>, born in 1977, is dedicated to advising Clients of CIAPM as its Senior Vice President, Managing Director, and Chief Compliance Officer. Mr. Bavedas earned a Master of Arts degree in Teaching from Sacred Heart University in 2012. Mr. Bavedas also earned a Bachelor's Degree in Communication and Media Studies from Sacred Heart University in 2003. Additional information regarding Mr. Bavedas's employment history is included below.

### Employment History:

Senior Vice President, Managing Director, and Chief Compliance Officer Constitution Capital, LLC	10/2020 to Present
Financial Advisor, Wells Fargo Clearing Services, LLC	08/2018 to 10/2020
Financial Advisor, Cambridge Investment Research, Inc.	07/2017 to 08/2018
Teacher, Fairfield Country Day School	01/2010 to 08/2018

### Certified Estate and Trust Planning Specialist<sup>TM</sup> (CES<sup>TM</sup>)

The CES<sup>TM</sup> designation, issued by the Institute of Business & Finance ("IBF"), provides increased knowledge in the area of estate planning and asset repositioning implementation. To earn the CES<sup>TM</sup> designation, one must complete a comprehensive 15-week program and successfully pass the examination process. Certificate holders are required to pay an annual certification fee, complete 30 hours of continuing education every two (2) years and adhere to the IBFs Code of Ethics and Standards of Practice to retain the CES<sup>TM</sup> designation.

## Item 3 – Disciplinary Information

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***There are no legal, civil, or disciplinary events to disclose regarding Mr. Bavedas.*** Mr. Bavedas has never been involved in any regulatory, civil, or criminal action. There have been no client complaints, lawsuits, arbitration claims, or administrative proceedings against Mr. Bavedas.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil, or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement, or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair, or unethical practices. ***As previously noted, there are no legal, civil, or disciplinary events to disclose regarding Mr. Bavedas.***

However, the Advisor encourages you to independently view the background of Mr. Bavedas on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his individual CRD# 4513282.

## Item 4 – Other Business Activities

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Mr. Bavedas is dedicated to the advisory activities of CIAPM's Clients. Mr. Bavedas does not have any other business activities.

## Item 5 – Additional Compensation

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Mr. Bavedas is dedicated to the advisory activities of CIAPM's Clients. Mr. Bavedas does not receive any additional forms of compensation.

## Item 6 – Supervision

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Mr. Bavedas serves as the Senior Vice President, Managing Director, and Chief Compliance Officer of CIAPM. Mr. Bavedas can be reached at (475) 269-3200.

CIAPM has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of CIAPM. Further, CIAPM is subject to regulatory oversight by various agencies. These agencies require registration by CIAPM and its Supervised Persons. As a registered entity, CIAPM is subject to examinations by regulators, which may be announced or unannounced. CIAPM is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.



**CONSTITUTION  
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**Constitution Capital, LLC  
d/b/a Constitution Investment Advisory and Portfolio  
Management**

**Form ADV Part 2B – Brochure Supplement**

**for**

**Sam E. Keylock  
Investment Advisor Representative**

**Effective: December 19, 2023**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Sam E. Keylock (CRD# 7844548) in addition to the information contained in the Constitution Capital LLC (“Constitution Capital” or the “Advisor”, CRD# 310378) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Constitution Capital Disclosure Brochure or this Brochure Supplement, please contact us at (475) 269-3200 or by email at [info@constitutioncapitalllc.com](mailto:info@constitutioncapitalllc.com).

Additional information about Mr. Keylock is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 7844548.



## Item 2 – Educational Background and Business Experience

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Sam E. Keylock, born in 1999, is dedicated to advising Clients of Constitution Capital as an Investment Advisor Representative. Mr. Keylock earned a Masters of Business Administration from Albertus Magnus College in 2023. Mr. Keylock also earned a Bachelors of Science in Accounting and Finance from Albertus Magnus College in 2022. Additional information regarding Mr. Keylock's employment history is included below.

### Employment History:

Investment Advisor Representative, Constitution Capital LLC	11/2023 to Present
Staff Accountant, Reebok	04/2023 to 10/2023
Student, Albertus Magnus College	09/2018 to 04/2023
Staff Accountant, Accavallo & Company	06/2022 to 11/2022
Assistant Manager, BevMax	01/2021 to 06/2022

## Item 3 – Disciplinary Information

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***There are no legal, civil or disciplinary events to disclose regarding Mr. Keylock.*** Mr. Keylock has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Keylock.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Keylock.***

However, we do encourage you to independently view the background of Mr. Keylock on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 7844548.

## Item 4 – Other Business Activities

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Mr. Keylock is dedicated to the investment advisory activities of Constitution Capital's Clients. Mr. Keylock does not have any other business activities.

## Item 5 – Additional Compensation

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Mr. Keylock is dedicated to the investment advisory activities of Constitution Capital's Clients. Mr. Keylock does not receive any additional forms of compensation.

## Item 6 – Supervision

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Mr. Keylock serves as an Investment Advisor Representative of Constitution Capital and is supervised by Gregory Bavedas, the Chief Compliance Officer. Mr. Bavedas can be reached at (475) 269-3200.

Constitution Capital has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Constitution Capital. Further, Constitution Capital is subject to regulatory oversight by various agencies. These agencies require registration by Constitution Capital and its Supervised Persons. As a registered entity, Constitution Capital is subject to examinations by regulators, which may be announced or unannounced. Constitution Capital is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

## Privacy Policy

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Effective: December 19, 2023

### Our Commitment to You

Constitution Capital, LLC ("CIAPM" or the "Advisor") is committed to safeguarding the use of personal information of our Clients (also referred to as "you" and "your") that we obtain as your Investment Advisor, as described here in our Privacy Policy ("Policy").

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. CIAPM (also referred to as "we," "our," and "us") protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

CIAPM does not sell your nonpublic personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below.

Details of our approach to privacy and how your personal nonpublic information is collected and used are set forth in this Policy.

### Why you need to know?

Registered Investment Advisors ("RIAs") must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

### What information do we collect from you?

Driver's license number	Date of birth
Social security or taxpayer identification number	Assets and liabilities
Name, address, and phone number[s]	Income and expenses
Email address[es]	Investment activity
Account information (including other institutions)	Investment experience and goals

### What Information do we collect from other sources?

Custody, brokerage, and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service the account

### How do we protect your information?

To safeguard your personal information from unauthorized access and use, we maintain physical, procedural, and electronic security measures. These include such safeguards as secure passwords, encrypted file storage, and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Clients' personal information.

We require third parties that assist in providing our services to you to protect the personal information they receive from us.

### How do we share your information?

An RIA shares Clients' personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Do we share?	Can you limit?
<b>Servicing our Clients</b> We may share nonpublic personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, and other financial institutions) as necessary for us to provide agreed-upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting.	Yes	No
<b>Marketing Purposes</b> CIAPM does not disclose and does not intend to disclose personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where CIAPM or the client has a formal agreement with the financial institution. <b>We will only share information for purposes of servicing your accounts, not for marketing purposes.</b>	No	Not Shared
<b>Authorized Users</b> Your nonpublic personal information may be disclosed to you and persons that we believe to be your authorized agent[s] or representative[s].	Yes	Yes
<b>Information About Former Clients</b> CIAPM does not disclose and does not intend to disclose nonpublic personal information to non-affiliated third parties with respect to persons who are no longer our Clients.	No	Not Shared

### State-specific Regulations

<b>Massachusetts</b>	In response to Massachusetts law, the Client must "opt-in" to share nonpublic personal information with non-affiliated third parties before any personal information is disclosed. Client opt-in is obtained through the Client's execution of authorization forms provided by the third parties, by executing an Information Sharing Authorization Form, or by other written consent by the Client, as appropriate and consistent with applicable laws and regulations.
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### Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise this Policy and will provide you with a revised Policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of nonpublic personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

### Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (475) 269-3200 or by email at [info@constitutioncapitalllc.com](mailto:info@constitutioncapitalllc.com).