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FORM ADV PART 2

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CIOVACCO

CAPITAL MANAGEMENT

This brochure provides information about the qualifications and business practices of Ciovacco Capital Management, LLC (CCM). If you have any questions about the contents of this brochure, please contact us at (678)362-7698. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Additional information about CCM also is available on the SEC's website at www.adviserinfo.sec.gov.

CCM refers to itself as a registered investment adviser. Please be advised that registration does not imply a certain level of skill or training.

No material changes since last amendment.

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Ciovacco Capital Management, LLC (henceforth referred to as CCM) is a registered investment advisor. The following information is provided in order to respond to the questions set forth in Part 2 of Form ADV, the form which investment advisors use to register with individual states.

Form ADV Part 2 is a written disclosure statement (or a written brochure), in paper or electronic format, which provides information about business practices, fees, and potential conflicts of interest the advisor (CCM) may have with its clients. The primary purpose of Part 2 is for CCM to provide information to current and potential clients that should be considered before becoming a client of CCM. CCM is a limited liability company formed under the laws of the State of Georgia. The information in this Form ADV Part 2 has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

4. Advisory Business

CCM offers portfolio management for individuals and/or small businesses. CCM has been in business since November 1999. Christopher Ciovacco is the principal owner of the firm.

CCM uses a proprietary model, the CCM Market Model (model or market model), to manage separate accounts held by a third-party custodian. The thoroughly researched and backtested market model recommends a prudent allocation between growth-oriented exchange traded funds (ETFs) and conservative ETFs. Growth-oriented ETFs include, but are not limited to, those with exposure to U.S. stocks, market sectors, small caps, mid caps, large caps, foreign stocks (regions of the globe and individual countries), diversified baskets of commodities, oil, copper, silver, and gold. Conservative ETFs include, but are not limited to, those with exposure to bonds, preferred stocks, and currencies. The model under very specific and limited circumstances can allocate to inverse-stock ETFs, such as SH. More information about the market model is available on CCM's website (www.ccmmarketmodel.com) and via this CCM Market Model [page](#).

CCM offers advice primarily on exchange traded funds (ETFs). ETFs selected by CCM's proprietary market model may be comprised of or have exposure to equity securities (exchange-listed, over-the-counter, and foreign issues), warrants, corporate debt securities, commercial paper, certificates of deposit, municipal securities, investment company securities (mutual fund shares, fixed and variable annuities), United States government securities, options contracts on securities and commodities, futures contracts on tangibles and intangibles, currencies, interests in partnerships investing in real estate, and oil & gas interests. CCM tailors advisory services, via three portfolio options (moderate, growth, aggressive), to the individual needs of clients based on factors such as risk tolerance, net worth, age, health, and family situation. CCM reserves the right to advise clients on any other type of investment that it deems appropriate based on the client's stated goals and objectives. CCM may also provide advice about any type of investment held in a client's portfolio at the inception of the advisory relationship. This [FAQ page](#) covers the topic of taxes and ETFs.

CCM manages investment advisory accounts and also imposes a minimum dollar value of assets for starting or maintaining an account.

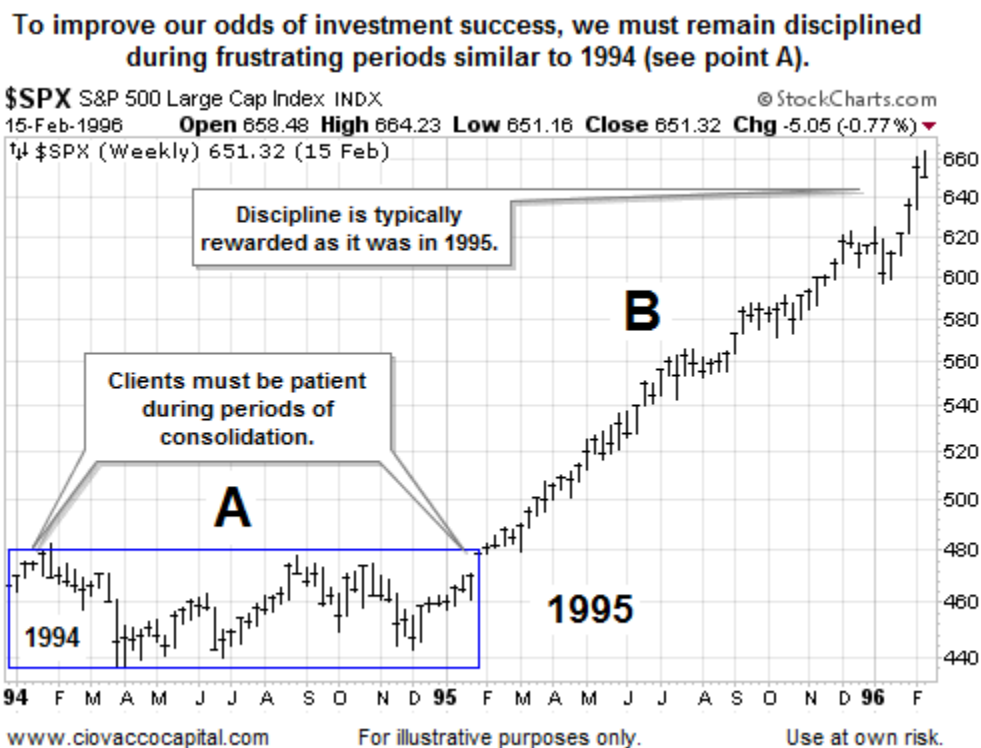
CCM does not hold itself out as a financial planner. CCM does not use the term *financial planning* or some similar term to refer to any for compensation services. Analysis of a client's current financial situation and discussions of their future financial situation may be completed in an effort to help both the client and CCM make more informed decisions about the suitability of particular investments or investment

allocations. CCM’s primary focus is money management, which is where 100% of CCM’s compensation is derived. CCM is not compensated separately for financial planning related services.

Risks and Limitations to the CCM Approach

Client portfolios are managed using a disciplined approach based on the current risk-reward profile of the stock market. The market model tracks the stock market’s current profile by answering thousands of questions about hard and observable evidence. The model compares the current stock market profile to historical profiles, and recommends a prudent mix of ETFs from a probabilistic perspective. While the model is based on sound economic principles, it cannot predict the future. Since market conditions can change rapidly, the model seeks to manage risk, but it cannot eliminate it. The basic premise of the CCM Market Model is to allocate more heavily to growth-oriented ETFs when the odds are in the client's favor, and allocate more heavily to more conservative assets when the odds of investment success are less favorable.

The probability of the model adding value increases when market conditions are indicative of strong investor conviction concerning the demand for growth-oriented assets relative to conservative assets. During periods of weak investor conviction (consolidation or sideways markets), the market model may appear to be adding little value from the perspective of some clients. The chart of the S&P 500 in 1994 below is an example of a period when clients may have trouble staying with CCM’s rules-based and disciplined approach to risk-management (see left side of chart).



Typically, the longer the consolidation period, the bigger the move (up or down) once conviction returns to one side of the market (bullish or bearish). If the rules are followed during frustrating periods, patience typically is rewarded since the model will greatly increase the odds of capturing a portion of the next big market move (up or down). The chart above is an example of a period of frustration/consolidation being followed by a big market move (see point B in chart above). Therefore, patient clients will have a much greater chance of investment success.

Trading Costs And Taxes

The CCM Market Model was developed based on the understanding that principal preservation and growth of principal are the primary objectives of investing, rather than minimizing the number of transactions. This [FAQ page](#) puts trading frequency and taxes into perspective.

Correlations

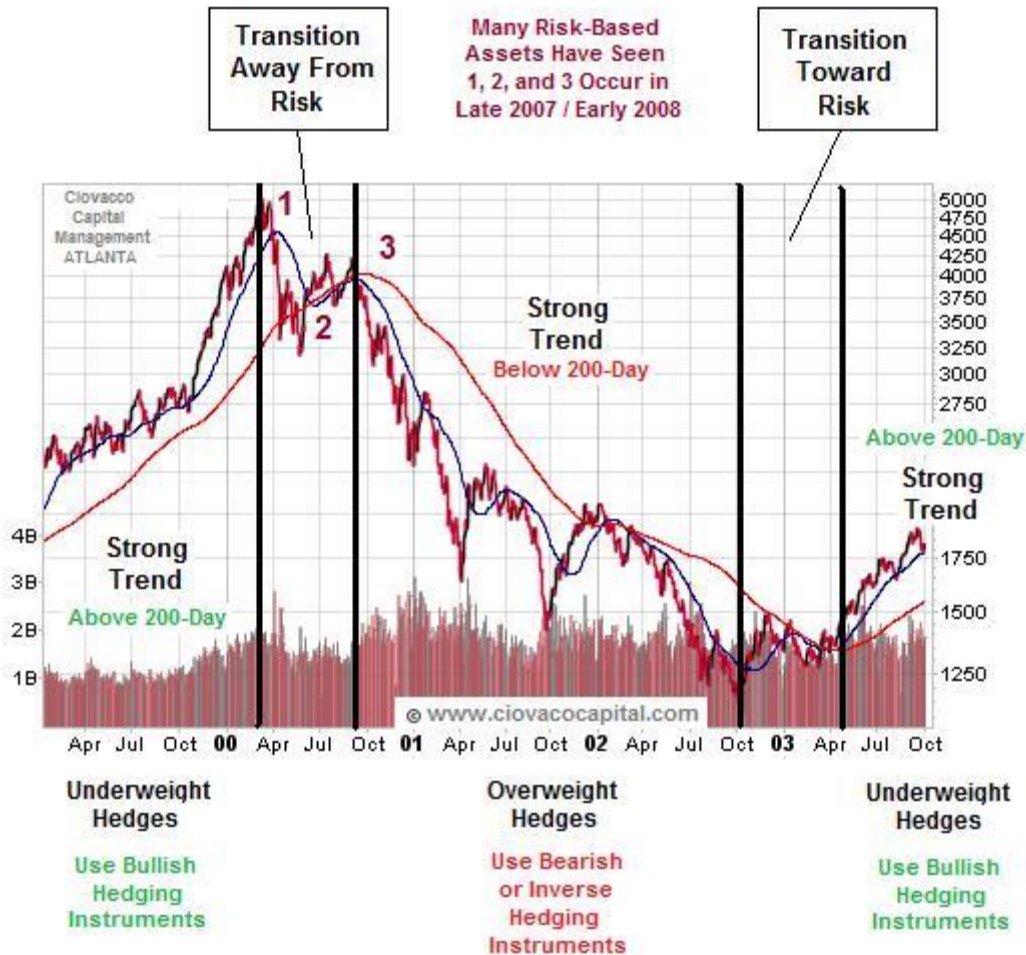
While CCM studies correlations between investment options extensively and attempts to reduce correlation risk, investment climates are greatly influenced by changes in the money supply which can cause all risk assets to move in unison. For example, during the 2003-2008 bull market, stocks, bonds, commodities, and foreign stocks all went up. In the 2008-2009 bear market they all, for the most part, went down. When the *inflation trade* is dominating the market, risk assets, even from separate asset classes, can become positively and highly correlated. This can create risk for all market participants since the expected benefits of diversification become somewhat diluted. The CCM Market Model can offset some correlation risk in periods of risk aversion via increased exposure to cash, bonds, currencies or other defensive ETFs. Protecting principal is extremely important. While the CCM approach to investing can reduce risk from a historical and simulated perspective, it can by no means eliminate risk. While examining historical returns and simulating future returns is beneficial, both rely on historical correlations between asset classes which change over time. Several factors contributed to an environment where stocks, bonds, and commodities all performed well from 2003-2007, an environment that pointed toward changing correlations between asset class price movements. As asset managers, we must be prepared to adjust to an ever changing investment landscape. Obviously, investing in the asset markets always presents challenges. However, the concepts presented here can help investors improve their odds of protecting and growing their assets in both favorable and unfavorable investment climates. All market-based investment portfolios are subject to principal loss, including a multiple asset class portfolio and those managed by the CCM Market Model.

Limited Use of Inverse Stock ETFs

When both the technical and fundamental outlooks favor bearish (unfavorable) outcomes over bullish (favorable) outcomes, CCM may use inverse investments to hedge against losses which may be incurred in the portfolio's more traditional long positions. Inverse investments utilized by CCM usually are in the form of ETFs. In an environment where stock market conditions continue to deteriorate, a slow migration away from risk and toward more bearish hedging vehicles may be warranted. During a bear market, based on market conditions, we would most likely make small incremental adjustments based on the relative performance between the standard investment (long) and inverse/hedged investment (short). This approach allows the market to decide which investment to overweight. As shown in the graph below (next page), the use of 50-day and 200-day moving averages is one of many ways to help the investor adjust

their asset allocation in an attempt to remain properly positioned for long-term trends, whether positive or negative. More on the limited use of inverse ETFs can be found on this [FAQ page](#).

**Using Moving Averages to Transition Your Portfolio
During Major Trend Changes
NASDAQ Composite Index (March 1999 - October 2003)**



For illustrative purposes only. Use at your own risk.

Basic chart created at www.stockcharts.com

On a discretionary basis, CCM manages \$88,781,496 in assets as of March 27, 2018. This figure is based on guidelines for defining discretionary assets under management. CCM does not participate in or sponsor a wrap-fee program. Clients may not impose restrictions on investing in certain securities or types of securities.

5: Fees and Compensation

CCM manages investment advisory accounts on a discretionary basis. CCM will calculate management fees every 90 calendar days according to the current fee payment cycle. Fees will be deducted from accounts by the Custodian sometime after the 90-day cycle is complete. Investment Advisory Fees are

calculated via a weighted average, based on the percentage of assets under management, according to the following schedule:

Cash & Cash Equivalents:	20 basis points or 0.20% per year
Diversified, Lower Volatility Investments / External Assistance:	50 basis points or 0.50% per year
Non-Diversified, Higher-Volatility Investments:	100 basis points or 1.00% per year

While CCM rarely includes mutual funds in client investment allocations, *External Assistance* refers to the possibility that some of CCM's decision-making responsibilities may be shared with a third-party manager. In the rare cases where CCM would invest in mutual funds or hire a third-party manager to oversee a relatively small portion of a client's portfolio, the client's fees are reduced to account for the *External Assistance* CCM receives. The assignment of each account position or investment to one of the classifications above is solely at the discretion of CCM. Written notice of fee payments will be provided via a line item on the Account Holder's monthly custodian-provided statement. Should the Account Holder/CCM client choose to terminate their agreement with CCM, no refunds of any previously deducted fees will be made. The above fee schedule is subject to change 60 days after written notice, which may be given via electronic mail. The fee schedule is fixed and non-negotiable.

Clients with household balances over \$2,000,000 may be eligible for a 5% reduction in fees based on the client's aggregate assets managed by CCM.

Clients with household balances over \$5,000,000 may be eligible for a 10% reduction in fees based on the client's aggregate assets managed by CCM.

Clients with household balances over \$10,000,000 may be eligible for a 15% reduction in fees based on the client's aggregate assets managed by CCM.

This [video clip](#) describes typical CCM fees during bull markets and during bear markets. Rates subject to change based on portfolio weightings. Client's actual rate may be higher or lower based on the client's individual investment needs and investment allocation. More conservative investment objectives typically result in lower annual CCM fees based on the fee schedule above (Cash & Cash Equivalents carry the lowest annual fees).

Clients also pay custodian trading costs and transaction fees. The custodian retains 100% of all transaction fees and custodian fees above. CCM does not receive any financial benefit or incentive to incur custodian fees on behalf of the client. CCM has no incentive to trade or *churn* the client's account. Since CCM is compensated 100% on the value of the client's account, CCM is financially motivated to reduce third-party custodial fees (just as an individual investor would be). CCM feels the way to make a prudent business decision on third-party custodial fees (or any third-party fee) is to review the fee in terms of the percentage of the client's principal. Assume we were considering making two trades in a client account worth \$1,000,000. If the custodian fees for the two trades came to \$17.90, then \$17.90 is .00179% of \$1,000,000. Therefore, if CCM feels the client can realistically make an additional .00177%, one-time, on the principal of \$1,000,000, then we have cost-justified the fee in some reasonable way. It is important for CCM clients and prospective CCM clients to understand there will be some additional third-party custodial fees incurred by clients as portfolios are rebalanced over time. Rebalancing fees can be substantially higher during periods of extreme volatility as we experienced in 2008 and 2009. Increased utilization of exchange-traded funds (ETFs) may result in higher average client fees. The wide array of specialized ETFs available today allow CCM to build multiple asset class portfolios almost exclusively with

ETFs. ETFs offer significant liquidity and flexibility advantages over mutual funds. ETFs can be bought or sold anytime during the trading day. Mutual funds can only be bought or sold once per trading day with the execution price being the closing price for the day. During periods of high volatility, an ETF's added flexibility may allow CCM to more quickly exit positions and thus better protect the client's principal. Stop-loss and buy-stop orders can be used with ETFs allowing more flexibility with entry and exit points compared to mutual funds. Since most ETFs are not actively managed by a third party, they are similar to an index mutual fund. Index funds and most ETFs do not provide *External Assistance* to CCM, which means most ETFs are assigned to the *Non-Diversified / Higher Volatility* fee category as outlined above. CCM believes the added trading flexibility associated with ETFs compared to mutual funds can help CCM more effectively attempt to meet client goals and objectives, especially in the area of preservation of principal in volatile markets.

Based on CCM's services provided, experience, and expertise, CCM's advisory fees are reasonable when compared to services offered from other sources. While lower fees for advisory services may be available from other sources, they would not be based on CCM's proprietary models and proprietary approach to money management.

CCM Account Termination Fee: CCM does not charge an account termination fee. All third party fees, including custodian fees, which are incurred as a result of an account termination or liquidation, are to be paid by the client. CCM will not reimburse the client for any third party fees at any time, unless specifically agreed upon in advance in writing.

Custodian & Third-Party Fees: In addition to any investment advisory fees, the CCM client will pay all commissions, transaction costs, or investment fees charged by third parties (such as Schwab Institutional or an ETF sponsor). Please see item 12 Brokerage Practices on page 23.

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

CCM does not accept performance-based fees, nor are any accounts set up in a side-by-side fee structure.

7: Types of Clients

CCM generally provides investment advice to individuals, high net worth individuals, pension and profit sharing plans, corporations, or other business entities. In order to become a new CCM client, minimum investment requirements are outlined on this [page](#). This figure is subject to change based on market conditions and current CCM workload. The figure may be adjusted upwards during periods of high market volatility to allow for more time to be dedicated to managing existing clients' assets while placing a lower priority on interacting with prospective clients.

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

CCM uses charting, fundamental, technical, and cyclical analysis methods in addition to those described herein. Investing in securities involves risk of loss that clients should be prepared to bear.

When you clear away all the noise, the basic goal of any investor is to be overweighted in asset classes in primary uptrends and underweighted in asset classes in primary downtrends. Allocations or weightings given to each asset class are based on the asset class' current risk-reward profile relative to all other asset classes. For example, in a favorable risk-reward environment, it is reasonable to own more stocks than

bonds. One of the easiest ways to evaluate the risk-reward profile of an asset class, sector, or region of the globe is to assess both the fundamental and technical outlook for that particular asset class, sector, or region of the globe. Fundamentals refer to topics such as the strength of the economy, corporate earnings, and monetary policy. Technical analysis uses charts and a host of indicators (a.k.a. technicals) to monitor how the fundamentals are affecting the appetite for risk in the collective mind of all market participants. The best case scenario for investing is when the fundamentals and technicals are sending the same signals, either positive or negative. Since the goal is to participate in long-term investment trends, it is prudent to wait for fundamental and technical alignment prior to making any significant shifts to your asset allocation. There were countless fundamental issues to be concerned about from 1982 to 1999, yet none of them derailed the primary uptrend in stocks. Stock market bears incorrectly predicted the onset of a long-term bear market countless times between 1982 and 2000. May 2006 is another example when the primary uptrends remained in place in the face of weakening fundamentals and a sharp correction in most asset markets.

Investors should never become overly confident about any particular investment theme, especially the timing of certain events tied to that theme (e.g. stocks going down, the U.S. dollar falling relative to other currencies, commodities going up, etc.). A multiple theme (multiple asset class/multiple ETF) approach improves the odds of success by increasing the probability of being right about some themes most of the time. In this way, investors never become too closed-minded or too defensive about any one particular theme or asset class. In simple terms, a multiple theme investor does not care which theme or themes are driving the market at the moment because that investor most likely owns some positions in their portfolio that are tied to themes that appear to be driving the market. The same ideas apply to the asset classes used to address each theme. A singular approach, such as being bearish about stocks (and only being short), can put an investor's portfolio at risk since the market can '*remain irrational longer than you can remain solvent*'. A multiple asset class approach gives the portfolio manager an opportunity to hold on to asset classes which are performing well and cut back or eliminate exposure to those that are underperforming. The CCM Market Model compares all asset classes/ETFs head-to-head and allocates to those with the best risk-reward profile from a probabilistic perspective.

Blending Historical Knowledge With The Present Day

While CCM does not heavily base current asset allocations on historical studies or historical data, we have done extensive research on asset class performance between 1970 and 2009. The studies illustrate the potential benefits of using non-traditional asset classes, such as commodities, emerging market stocks, and currencies, in concert with the more traditional portfolio components, U.S. stocks and U.S. bonds. CCM's approach relies heavily on *listening to the market* by observing current and potential changes in trends and investors' willingness to accept risk. By identifying asset classes that are currently market leaders and those that are market laggards, we can better understand the collective fundamental concerns and future economic views held by all market participants. For example, when the U.S. dollar and U.S. Treasury bonds are leading the markets and commodities and stocks are lagging, it can indicate potential concerns related to slow economic growth and little concern related to future inflation. Current market leaders and market laggards can help CCM identify major global macro investment themes that appear to be foremost in the minds of investors.

Government Policy and Knowledge Of History

Understanding monetary and fiscal policy and their ultimate effect on the money supply is vitally important to investors. Asset classes which perform well in periods where the money supply is expanding (inflation) are quite different than those that perform well during periods of money supply contraction

(disinflation or deflation). CCM's Multiple Asset Class Database (MACDB) contains performance data for a wide variety of asset classes going back to 1970. MACDB allows CCM to understand from a historical perspective which asset classes have led the markets during periods of inflation/economic expansion and which asset classes have led in periods of disinflation/economic contraction/deflation. CCM built a proprietary Asset Class Simulator (ACS) which helps us simulate the performance of various asset allocations under a wide range of possible future outcomes, such as a protracted bear market. MACDB and ACS are not used extensively to create current client allocations, but they do help CCM understand possible permutations and combinations of asset classes that may perform well in the current environment. CCM believes building portfolio allocations with the use of historical data or backtesting is helpful, but acknowledges the limitations of trying to project the past into an uncertain and ever-changing future. Backtesting and simulations of possible future outcomes can help us broaden our understanding of the investment options available that may relate well to the issues of the present day. Client allocations are built based on observable and hard evidence from the present day, rather than projections of possible future outcomes or historical outcomes.

Building Asset Allocations for The Present Day

CCM's proprietary ETF screening models are used to identify any security which currently exhibits characteristics associated with future market leadership and leading asset classes. The mathematically-based screens review all major and liquid ETFs. ETFs from the screens are then compared head-to-head allowing CCM to focus on the most attractive market sectors, regions of the globe, individual countries, assets classes, etc.

Asset Allocation and Portfolio Management Statement of Purpose

To give CCM clients a reasonable probability of producing superior full-market cycle returns under varied market conditions while reducing volatility.

Incremental Shifts Away From Losses and Toward Gains

The proprietary CCM Market Model seeks to participate in investment gains produced by asset classes in long-term uptrends, while minimizing the underperformance or losses produced by asset classes in long-term downtrends. The model calls for small incremental shifts to avoid overreacting to what may turn out to be a short-term trend or false signal. Our objective as investors is to be overweighted in the better performing asset classes and underweighted in the lagging asset classes.

Most investors know that frequent trading or rebalancing tends to hurt long-term performance. This is easy to understand from many perspectives, but it is much harder to remember/implement when the markets are falling, investors are losing money, and human emotions are involved. CCM uses a disciplined approach based on quantitative and qualitative methods to make rational asset allocation decisions based on facts rather than emotion. The CCM strategy also places an emphasis on cutting losses rather than letting losing positions erode capital over extended periods of time. Losses tend to be cut when evidence mounts that a long-term trend may be ending or experiencing a significant countertrend rally.

While short-term market timing or timing outcomes based on a particular investment theme is challenging, understanding long-term trends based on what has happened and what is happening is possible, especially secular trends which can last for 20 years or more. Similarly, understanding the current situation (what is happening now conveyed mainly through price, trends, and volume) is also possible without relying on forecasts of future market outcomes.

The comments above lead to a desire for investors to (a) remain close to fully invested at all times, (b) invest with multiple themes in mind, (c) build portfolios from multiple asset classes with some asset classes having either a low or negative correlation to U.S. stocks, and (d) let the market dictate which themes or asset classes are in favor in the intermediate and long-term (*listening to the market*). *Staying the course* in a multiple asset class approach, especially when married with hedging strategies, is much more realistic since it may be possible to make money in both good and bad times for U.S. stocks (or even U.S. bonds). *Stay the course* from CCM's perspective does NOT mean adopting a blind buy-and-hold strategy while bear markets destroy hard-earned principal over extended periods of time.

By adding additional asset classes to a traditional mix of U.S. stocks and U.S. bonds, an investor can have a realistic probability of avoiding the large losses which can occur during a bear market. Since our screening process casts a wide net, our pallet of investment options is large. Below are *some* examples of asset classes or investments tracked by the CCM Market Model:

- U.S. Stocks - Diversified
- U.S. Bonds
- Emerging Market Stocks Diversified
- Chinese Stocks
- Indian Stocks
- Brazilian Stocks
- Emerging Market Bonds
- Inverse U.S. Treasury Bonds
- Income – Credit Related
- Municipal Bonds Diversified
- Australian Dollar – Currency
- Canadian Dollar – Currency
- Brazilian Real – Currency
- Chinese RMB/Yuan – Currency
- Euro - Currency
- Inverse U.S. Dollar - Currency
- Crude Oil – Physical Commodity
- Gasoline – Physical Commodity
- Copper – Physical Commodity
- Natural Gas – Physical Commodity
- Gold – Physical Commodity
- Silver – Physical Commodity
- Wheat – Physical Commodity
- Aluminum – Physical Commodity
- Corn – Physical Commodity
- Soybeans – Physical Commodity
- Technology Stocks – Sector
- Semiconductor Stocks – Sector
- Networking Stocks – Sector
- Broker/Dealer Stocks – Sector
- Hedged Commodity Stocks
- Alternative Energy Stocks – Sector
- Energy Stocks – Sector

- Base Metals Stocks – Sector
- Agricultural Stocks – Sector
- Precious Metals Stocks – Sector
- Coal Stocks – Sector
- Steel Stocks – Sector
- Oil & Gas Limited Partnerships
- Timber

Sources of Information: CCM believes reading is the basis for formulating well-founded global macro major investment themes. CCM also believes money managers must gain knowledge and information from a variety of books, periodicals, and websites in order to keep an open mind about possible future investment outcomes. If you want to be bullish, you can always find bullish newsletters, columnists, and money managers. Similarly, if you want to be bearish, regardless of the current environment, you can always find bearish sources of information. This creates information bias and can negatively affect your understanding of the meaningful issues of the day. CCM believes money managers should seek to eliminate information bias.

CCM uses periodicals, such as *The Economist*, *The Wall Street Journal*, *Investor’s Business Daily*, *Barron’s*, and *Forbes*. Numerous websites, such as www.stockcharts.com and www.bloomberg.com, are also used.

CCM uses books, such as Dr. Marc Faber’s *Tomorrow’s Gold*, Dr. Alexander Elder’s *Trading For A Living*, Van K. Tharp’s *Trade Your Way To Financial Freedom*, Curtis M. Faith’s *Way of The Turtle*, Thomas Friedman’s *The World is Flat*, Benjamin Graham’s *The Intelligent Investor*, David Keller’s *Breakthroughs in Technical Analysis*, Mark Douglas’ *Trading In The Zone*, Jim Rodger’s *A Bull in China*, and Michael W. Covel’s *Trend Following*.

CCM also uses historical investment performance figures, usually going back to 1970, in an effort to better understand past asset class correlations and the historical effect on different investment allocations during different market conditions (both favorable and unfavorable). Daily historical investment values can be obtained from a variety of sources such as <http://finance.yahoo.com/>. Annual investment returns can be found in publications such as Morningstar’s *Mutual Fund 500*. Technical analysis (basically the use of charts) is heavily incorporated into CCM’s approach to investing and portfolio rebalancing. This information comes from a wide variety of sources, such as www.stockcharts.com. Price and volume information is often used from www.investors.com or <http://finance.yahoo.com/>.

While CCM’s focus is on long-term results, based on market conditions, the investment strategies used to implement any investment advice given to clients may include in addition to long-term purchases (securities held at least a year), short-term purchases (securities sold within a year), and trading (securities sold within 30 days).

Investment Risk Disclosures:

One of CCM’s primary objectives is to attempt to manage risk and volatility for clients within the context of a diversified investment program. Obviously, to manage any type of risk(s), it is first necessary to define the risk(s) as clearly as possible. Attempting to manage the risks present in today’s investment markets requires a well thought out approach to portfolio design and ongoing management. The greatest risk of an investment program is that you could lose money. Past performance does not ensure future results, and there is no assurance that CCM will achieve client objectives. Current performance may be lower or

higher than the performance data cited by CCM. A CCM client's account, when redeemed, may be worth more or less than its original value. Account holders should consider the investment objectives, risks, charges, and expenses of any investment program carefully before investing. CCM uses a broadly diversified approach to investing, but accounts may be subject to wide fluctuations in value because they may have positions in ETFs holding common stocks, bonds, commodities, timber, real estate, currencies, precious metals, etc. In general, the CCM approach to investing is appropriate for investors who have a medium to long-term investment horizon (five years or longer), who are seeking growth in capital as a primary objective, and who are prepared to endure sometimes prolonged declines in account values that may occur from time to time in any investment program. Due to changing market conditions, the level of current income produced by the CCM investment approach can range from moderate to very low. Clients could lose money over short or even long periods. You should expect your account's value and total return to fluctuate within a wide range, like the fluctuations of the overall stock market.

While the CCM Market Model and CCM's diversified approach to investing attempts to reduce the risks discussed above and below, it cannot eliminate them. Any individual investment within a diversified portfolio, and thus your account's overall performance, could be hurt by:

Market Risk: CCM clients are subject to market risks that will affect the value of their portfolios, including adverse issuer, political, regulatory, market or economic developments, as well as developments that have an impact on specific economic sectors, industries or segments of the market.

Stock Market Risk: The chance that stock prices overall will decline. Stock markets tend to move in cycles, with periods of rising stock prices and periods of falling stock prices.

Investment Style or Class Risk: Specific types of investments and investment classes tend to go through cycles of doing better—or worse—than the stock market in general. These periods have, in the past, lasted for as long as several years.

Growth Risk: The risk of the lack of earnings increase or lack of dividend yield.

Mid-Cap Company Risk: Mid-Cap companies may have narrower commercial markets, less liquidity and less financial resources than Large-Cap companies.

Small-Cap Company Risk: Small-Cap companies may have narrower commercial markets, less liquidity and less financial resources than Mid-Cap or Large-Cap companies.

Sector Risk: The risk of holding an investment in similar businesses or a single investment class, which could all be affected by the same economic or market conditions.

High-Yield Risk: The risk that results from investments in below investment grade bonds, which have a greater risk of loss of money, are susceptible to rising interest rates, and have greater volatility.

Fixed Income Risk: This risk arises if an issuer of a fixed income security is unable to meet its financial obligations or goes bankrupt.

Interest Rate Risk: Investments may be adversely affected by changes in global interest rates.

Foreign Security Risk: The risk of instability in currency exchange rates, political unrest, economic conditions, or foreign law changes.

Emerging Markets Risk: Investing in emerging markets has great political uncertainty, dependence on foreign aid, and a limited number of buyers.

Derivative Risk: The risk that strategies used in purchasing futures contracts, foreign currency forward contracts, and options futures may not succeed.

Portfolio Turnover Risk: The risk that performance may be adversely affected by a high rate of portfolio turnover, which generally leads to greater transaction and tax costs.

Market Timing Risk: This risk arises because an account's value may be affected by market timing, especially in foreign markets.

Information Quality Risk: The risk that less information may be available to investors in foreign or emerging market countries or that the information may be out of date or carry a lower level of assurance.

Concentration Risk: Concentration risk results from maintaining exposure to issuers conducting business in a specific industry or related to a specific investment theme. The risk of concentrating investments in a particular industry or tied to a specific theme is that a portion of the client's portfolio will be more susceptible to the risks associated with that industry or theme. CCM clients, depending on their risk tolerance, suitability, and market conditions, may have a significant portion of their portfolio allocated to investments which perform well during periods of U.S. dollar weakness relative to a basket of foreign currencies. These investments, which may include commodities, foreign bonds, foreign stocks, precious metals, and foreign real estate, may have positive correlations in terms of price movements.

Credit Risk: Credit risk is the risk that an issuer or guarantor of a security or counterparty to a financial instrument may default on its payment obligations or experience a decline in credit quality.

Debt Instrument Risk: Debt instruments may have varying levels of sensitivity to changes in interest rates, credit risk and other factors affecting debt securities. Typically, the value of outstanding debt instruments falls when interest rates rise. The value of debt instruments with longer maturities may fluctuate more in response to interest rate changes than those of instruments with shorter maturities.

Risks of Investing in Real Estate Investments: Real estate instruments are subject to risks similar to those associated with direct ownership of real estate, including changes in local and general economic conditions, vacancy rates, interest rates, zoning laws, rental income, property taxes, operating expenses and losses from casualty or condemnation. An investment in a real estate investment trust ("REIT") is subject to additional risks, including poor performance by the manager of the REIT, adverse tax consequences, and limited diversification resulting from being invested in a limited number or type of properties or a narrow geographic area.

Geographic Concentration Risk: Investments in a particular geographic region may be particularly susceptible to political, diplomatic or economic conditions and regulatory requirements. As a result, investments that focus in a particular geographic region may be more volatile than a more geographically diversified fund.

The risks above are disclosed in a good faith effort to inform current and prospective CCM clients of issues that could adversely affect the value of an investment portfolio. The disclosure above does not attempt to convey the risks disclosed are the only risks present when investing. Future circumstances may present additional risks to any investment portfolio.

Risks Which May Be More Prevalent In Inverse or Short Investments

As stated above, when both the technical and fundamental outlook favor bearish outcomes over bullish outcomes, CCM may use inverse investments to hedge against losses which may be incurred in the portfolio's more traditional long positions. The risks described below may be specific to a portion of the CCM client's portfolio allocated to inverse or short ETFs. Inverse or short ETFs have been used in CCM allocations in 2000-2002, 2007-2009, and 2011-2012. Short and inverse ETFs are used primarily when a particular market, asset class, or sector appears to be in a long-term downtrend, which can occur while other asset classes are in bull markets.

While the risks associated with inverse investment vehicles are real, current and prospective clients should understand these risks would be present in a relatively small portion of their portfolio. In the early stages of a bear market, or what appears to be a long-term downtrend for an asset class, CCM may allocate 1% to 30% of a client's portfolio to inverse or short ETFs, which means 70% to 99% of the client's portfolio typically would not be subject to risks specifically associated with these investments. In more adverse market conditions, where traditional stock investors are experiencing longer-term and deeper investment losses, CCM may, at its sole discretion, choose to allocate more than 30% of a client's portfolio to inverse or short ETFs. In any event, inverse or short ETFs will always be part of a diversified investment approach which compares inverse-stock ETFs to more traditional ETFs. CCM reserves the right, based on unanticipated market conditions, to allocate a client's portfolio in a fashion which CCM deems best to manage risk. CCM understands the unique risks and volatility considerations associated with the use of inverse or short funds, even within the context of a well-diversified investment program. More on the possible and limited use of inverse-stock ETFs can be found on this [FAQ page](#).

Description of Terms Related To Risk

CCM's portfolios typically are built using ETFs. In order to meet the client's objectives, CCM reserve the right to use any investment vehicle at any time. Therefore, CCM portfolios may contain investments which have exposure to financial instruments including investment contracts whose value is derived from the value of an underlying asset, interest rate, currency or index such as futures contracts, options on future contracts, swap agreements, forward contracts, structured notes, options on securities and stock indexes and cash investments in debt or money market instruments covering such positions.

Forward contracts are two-party contracts where a purchase or sale of a specific quantity of a commodity, security, foreign currency or other financial instrument at a set price is entered into with dealers or financial institutions, with delivery and settlement at a specified future date. Forwards may also be structured for cash settlement, rather than physical delivery.

Futures or futures contracts are contracts to pay a fixed price for an agreed-upon number of commodities or securities, or the cash value of the commodities or securities on an agreed-upon date.

Swap agreements, reverse repurchase agreements, borrowing, futures contracts, short sales and options on securities indexes and forward contracts all may be used by third party managers to create leverage.

Use of leveraged investment techniques may involve additional costs and risks to a portion of the CCM client's portfolio.

Option contracts grant one party a right, for a price, either to buy or sell a security or futures contract at a fixed price during a specified period or on a specified day.

Repurchase agreements are contracts in which the seller of securities, usually U.S. Government Securities or other money market instruments, agrees to buy them back at a specified time and price.

While CCM does not anticipate the need to sell individual securities short, CCM may incorporate ETFs into portfolios that incorporate short selling into their strategy. Selling short entails selling a stock or debt instrument, usually borrowed, and buying it back at a later date. Entering into short positions through financial instruments such as futures, options and swap agreements is intended to have similar investment results as selling short.

Structured notes are debt obligations which may include components such as swaps, forwards, options, caps or floors which change their return patterns. Structured notes may be used to alter the risks to a portfolio, or alternatively may be used to expose a portfolio to asset classes or markets in which one does not desire to invest directly.

Swap agreements are two-party contracts where the parties agree to exchange net returns (or differentials in rates of return) earned or realized on particular predetermined investments or instruments.

Description of Risks – Inverse or Short Investments

Aggressive Investment Technique Risk: Within the framework of a diversified portfolio, CCM may use financial instruments which incorporate non-traditional investments, such as futures contracts, options on futures contracts, forward contracts, swap agreements, and similar instruments which may be considered aggressive. Particularly when used to create leverage, the use of aggressive investment techniques may expose a portion of a CCM client's portfolio to potentially dramatic changes (losses or gains) in the value of instruments and imperfect correlation between the value of the instruments and the relevant security or index.

Leverage Risk: Use of leveraged ETFs is not anticipated, but having maximum flexibility, especially in periods of rapidly changing market conditions, is in the client's best interest. Therefore, under rare and limited circumstances, CCM may allocate a portion of a client's portfolio to investments which are "leveraged" in the sense that they have investment objectives to match a multiple of the performance of an index on a given day.

Counterparty Risk: Portions of a client's portfolio may be subject to credit risk, as discussed below, with respect to the amount an investment expects to receive from counterparties to financial instruments entered into by the investment or held by special purpose or structured vehicles. If counterparty becomes bankrupt or otherwise fails to perform its obligations, the value of the client's investment may decline.

Liquidity Risk: In certain circumstances, such as the disruption of the orderly markets for the securities or financial instruments in which a portion of a client's portfolio may be invested, the third-party fund managers might not be able to dispose of certain holdings quickly or at prices that represent true market value in the judgment of the third-party manager. Certain derivative securities, such as over-the-counter contracts, held by third-party managers may also be illiquid.

Short Sale Risk: Selling short is a technique that may be employed in a portion of the client's portfolio via pooled instruments such as ETFs to achieve investment exposure consistent with current market conditions. Short selling involves borrowing a security and then selling it. If a short seller buys back the security at a price lower than the price at which it sold the security plus accrued interest, the investment will earn a positive return (profit) on the difference. If the current market price is greater when the time comes to buy back the security plus accrued interest, the investment will incur a negative return (loss) on the transaction.

While CCM seeks to take advantage of investment opportunities for clients that will seek to balance investment returns with the risk of loss, there is no guarantee that such opportunities will ultimately benefit the CCM client. CCM will change client portfolios in response to market conditions that are unpredictable and may expose the client to greater market risk than seen in previous market cycles. There is no assurance that CCM's investment strategy will enable the client to achieve their investment objectives. Frequent trading can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

9: Disciplinary Information

CCM and its management have not been involved in any disciplinary actions, including criminal or civil actions in a domestic, foreign or military court; administrative proceedings before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority; or proceedings before a self-regulatory organization (SRO). Clients that reside in the state of Massachusetts can obtain the disciplinary history of CCM and/or CCM's representatives from the Massachusetts Securities Division upon request.

10: Other Financial Industry Activities and Affiliations

CCM does not engage in any other business activities outside of the management of investment advisory accounts, nor does CCM have any industry affiliations. Neither CCM nor a related person is a general partner in any partnership in which clients are solicited to invest.

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

CCM and its principal(s) follow the same investment strategies based on the same philosophies as those described above and used to manage client accounts. As a result, CCM, its principal(s), and related persons may (and most likely will) buy or sell for themselves identical securities that CCM also recommends to clients. All CCM, CCM principals, and employee transactions are subject to the CCM Code of Ethics (COE), which is outlined in this document. The CCM COE and this policy have been established recognizing that some securities being considered for purchase and/or sale on behalf of CCM clients trade in sufficiently broad markets to permit transactions by clients to be completed without an appreciable impact on the markets of the securities. CCM tends to invest client funds into highly liquid and widely available securities. Therefore, client, CCM, CCM principal, and employee transactions may have little to no material effect on the security's market value.

Consistent with investment advisory clients' or prospective clients' investment objectives, we may recommend or execute the purchase or sale of securities in which we, or our clients, directly or indirectly, have a position or interest.

All our employees are required to follow our Code of Ethics which places the interests of advisory clients first. Subject to satisfying this policy and applicable laws, employees may trade for their own accounts in securities which are recommended to and/or purchased for our clients. Additionally, our employees may invest in any of our investment strategies alongside our clients. The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of our employees will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee. Employee trading is continually monitored under the Code of Ethics, and to reasonably prevent conflicts of interest between our firm and its clients.

Certain affiliated accounts may trade in the same securities with client accounts on an aggregated basis when consistent with our obligation of best execution. In such circumstances, the affiliated and client accounts will share commission costs equally and receive securities at a total average price. We will retain records of the trade order (specifying each participating account) and its allocation, which will be completed prior to the entry of the aggregated order. Completed orders will be allocated as specified in the initial trade order. Partially filled orders will be allocated on a pro rata basis. Any exceptions will be explained on the Order.

CODE OF ETHICS

As a registered investment advisor, Ciovacco Capital Management, LLC (CCM) places the client's best interests first. Our integrity and fiduciary duty must remain at the forefront of all actions taken to serve clients. This CCM Code of Ethics (COE) is given to each employee with instructions the code must be followed at all times. The CCM COE is intended to remind all employees of their obligations to clients as well as provisions requiring reporting of personal securities transactions and holdings. A copy of the CCM COE will be provided to any client or prospective client upon request.

The CCM COE sets out ideals for ethical conduct premised on fundamental principles of openness, integrity, honesty and trust. CCM places a highest value on ethical conduct. CCM challenges employees to live up not only to the letter of the law, but also to the ideals of the organization and the CCM COE. CCM reminds employees that investment opportunities, if deemed suitable, must be offered first to clients before CCM employees may act on them.

All CCM personnel are required:

To comply with applicable federal securities laws.

To report their personal securities transactions and holdings to CCM management.

To provide CCM with duplicate trade confirmations and account statements.

To obtain CCM approval before investing in an initial public offering ("IPO") or private placement.

To report any violations of the CCM Code of Ethics promptly to the CCM Chief Compliance Officer.

To review a written copy of the CCM Code of Ethics (COE) and any amendments, and to provide written acknowledgment of their receipt of the code and any amendments.

CCM will adhere to the following reporting requirements:

Access persons must submit to the CCM Chief Compliance Officer a report of the access person's current securities holdings that meet the following requirements:

- (A) The title and type of security, and as applicable the exchange ticker symbol or CUSIP number, number of shares, and principal amount of each reportable security in which the access person has any direct or indirect beneficial ownership;
- (B) The name of any broker, dealer or bank with which the access person maintains an account in which any securities are held for the access person's direct or indirect benefit; and
- (C) The date the access person submits the report.

CCM access persons must each submit a holdings report:

- (A) No later than 10 days after the person becomes an access person, and the information must be current as of a date no more than 45 days prior to the date the person becomes an access person.
- (B) At least once each 12-month period thereafter or a date selected by CCM management, the information must be current as of a date no more than 45 days prior to the date the report was submitted.

CCM access persons must submit to the CCM Chief Compliance Officer quarterly securities transactions reports that meet the following requirements:

- (A) The date of the transaction, the title, and as applicable the exchange ticker symbol or CUSIP number, interest rate and maturity date, number of shares, and principal amount of each reportable security involved;
- (B) The nature of the transaction (*i.e.*, purchase, sale or any other type of acquisition or disposition);
- (C) The price of the security at which the transaction was effected;
- (D) The name of the broker, dealer or bank with or through which the transaction was effected; and
- (E) The date the access person submits the report.

Each CCM access person must submit a transaction report no later than 30 days after the end of each calendar quarter, which report must cover, at a minimum, all transactions during the quarter.

Exceptions from reporting requirements

The CCM COE does not require an access person to submit:

- (i) Any report with respect to securities held in accounts over which the access person had no direct or indirect influence or control

(ii) A transaction report with respect to transactions effected pursuant to an automatic investment plan

(iii) A transaction report if the report would duplicate information contained in broker trade confirmations or account statements that you hold in your records so long as you receive the confirmations or statements no later than 30 days after the end of the applicable calendar quarter.

Pre-approval of certain investments: The CCM COE requires CCM access persons to obtain approval before they directly or indirectly acquire beneficial ownership in any security in an initial public offering or in a limited offering.

In the event that CCM maintains only one control person, that control person is not required to submit reports to himself/herself or to obtain approval for investments in any security in an initial public offering or in a limited offering. CCM must maintain records of all holdings and transactions.

For the purposes of the CCM COE, access person means:

(i) Any CCM supervised persons:

(A) Who have access to nonpublic information regarding any client's purchase or sale of securities, or nonpublic information regarding the portfolio holdings of any reportable fund, or

(B) Who is involved in making securities recommendations to clients, or who has access to such recommendations that are nonpublic.

Since providing investment advice is CCM's primary business, all directors, officers and partners are presumed to be access persons.

Reportable security means a security as defined in section 202(a)(18) of the Act (15 U.S.C. 80b-2(a)(18)), except that it does not include:

(i) Direct obligations of the Government of the United States;

(ii) Bankers' acceptances, bank certificates of deposit, commercial paper and high quality short-term debt instruments, including repurchase agreements;

(iii) Shares issued by money market funds;

(iv) Shares issued by open-end funds other than reportable funds; and

(v) Shares issued by unit investment trusts that are invested exclusively in one or more open-end funds, none of which are reportable funds.

CCM will keep copies of CCM COE, records of violations of the code and actions taken as a result of the violations, and copies of their supervised person's written acknowledgment of receipt of the code. As discussed earlier, CCM requires prompt internal reporting of violations of the code of ethics.

PRIVACY STATEMENT

Respect for our customers' privacy has always been highly valued by CCM. Not only is it what CCM clients expect, it is also the right way to conduct business. The trust of our clients and potential clients is our most valuable asset and the reason we earn your business. This trust is built, in part, upon the proper handling of personal information.

This privacy statement was created for Ciovacco Capital Management, LLC (CCM) in order to demonstrate our firm commitment to maintaining the confidentiality, integrity and security of personal information. The following discloses our information and dissemination practices within CCM and CCM's website. Our privacy policies are reviewed annually and updated to reflect any material changes.

We are not responsible for the privacy practices of the content of other websites.

THIS PRIVACY POLICY IS PROVIDED ON BEHALF OF:

Ciovacco Capital Management, LLC (CCM)

Safeguarding Your Confidential Information: CCM recognizes the importance of protecting your privacy and has established policies to safeguard your confidential information. Key elements of those policies are as follows:

- CCM does not sell your personal information to anyone.
- CCM does not share your information with anyone, except as required or permitted by law or as implicitly authorized by you.
- CCM receives information about you in the normal course of providing financial services.
- CCM maintains physical, electronic, and procedural safeguards to protect your privacy.
- CCM maintains a Business Continuity Plan describing how it intends to respond to possible significant business disruptions such as a natural disaster, power failure, or civil unrest. If a disruption affects the CCM Home Office, you should expect continued access to the company actually holding your investments (custodian, mutual fund company, clearing firm, insurance company, etc.). Also, you may want to contact your CCM Representative and/or <https://www.ccmmarketmodel.com> or www.schwaballiance.com (if operable), for updated information.

COLLECTING YOUR INFORMATION

CCM uses personal information about you to assist in providing you with the superior service you expect from us. We may use this information to offer products and services, process transactions in your account, respond to inquiries from you, or fulfill legal and regulatory requirements. To conduct regular business, we may collect non-public personal information from sources such as:

- Information reported by you on applications or other forms you provide
- Information about your transactions with us, our affiliates, or others
- Information obtained through discussions with clients
- Information received through our email contact forms on our website or direct e-mails
- Information received from other sources with your consent or with the consent of your representative

SHARING YOUR INFORMATION

CCM shares non-public information solely to service our client accounts. We do not disclose any non-public personal information about our clients or former clients to anyone, except as permitted or required by law. CCM may share client information with the client's third-party custodian, a service provider. CCM does not share non-public personal information with any other third parties.

INFORMATION SAFEGUARDING

CCM internally safeguards your non-public personal information by restricting access to only those employees who provide products or services to you or those who need access to your information to service your account. In addition, we still maintain physical, electronic and procedural safeguards that meet federal and/or state standards to guard your non-public personal information. Please contact CCM if you identify any error in the information associated with your accounts, or if you have questions about the use and maintenance of your confidential information.

OUR INTERNET POLICY

CCM maintains strong e-business privacy standards relating to financial services. Our internet website is www.ciovaccocapital.com. Contact information obtained from these sites is used only within CCM and is not for public knowledge.

- **Email Addresses:** Our site keeps user email addresses private. They are never disclosed or sold to outside sources. If requested in a contact form, we will direct comments and/or questions according to the sender's direction.
- **Security:** Our site has security measures in place to protect the loss, misuse and alteration of the information under our control.
- **Browsers:** We highly recommend the use of a 128-bit key browser for optimum privacy and security.
- **Site Statistics:** Our website does not capture information regarding an individual's use of our site. However, we do receive reports that aggregate usage on an anonymous basis to allow us to improve the user experience on our sites. Our statistics program logs your IP address, pages viewed, time spent at the site, browser type and certain geographic origin information, as well as referring URL information. These logs are important to improve the content and functionality of our site.

INTERNET SPECIFIC PRACTICES

CCM and CCM custodians make extensive use of firewall barriers, encryption techniques and authentication procedures for client-only site access at www.schwaballiance.com. Only active clients may have access to our proprietary material. If you have any further questions regarding our privacy practices, please direct them to Chris Ciovacco, Ciovacco Capital Management, LLC, 285 Centennial Olympic Park Drive, Number 303, Atlanta, GA 30313.

12: Brokerage Practices

CCM requires that clients establish brokerage accounts with the Schwab Institutional division of Charles Schwab & Co., Inc. (Schwab), a registered broker-dealer, member SIPC, to maintain custody of clients'

assets and to effect trades for their accounts. CCM is independently owned and operated and not affiliated with Schwab. Unless specifically agreed upon in advance in writing, CCM has the authority to determine, via the CCM Client Agreement and Limited Power Of Attorney, without obtaining specific consent, the securities bought and sold, amount of securities bought and sold, and the broker or dealer to be used. CCM's intention is to keep all clients informed, usually via published the internet, of the basic structure of investment portfolios and any possible future changes that may be made to those portfolios. Investment and brokerage discretion is maintained legally in order to facilitate efficient and timely changes to client accounts should market conditions warrant. The intent of discretion is one of speed and efficiency rather than a desire to reduce communication and interaction with clients. Prospective clients are encouraged to discuss the use of CCM discretion in managing their accounts prior to becoming a CCM client. Discretion is used primarily for the timing, magnitude, and scope of portfolio changes. In order to faithfully execute a fiduciary duty and allocate the proper amount of time to investment research and client account management, CCM must attempt to find a real-world balance between one-on-one client interaction and maintaining a focus on the primary task of money management. Efficient interaction with clients is necessary in order to devote the vast majority of CCM man-hours to investment research and portfolio management. Money management requires the ability to understand and focus on large quantities of both quantitative and qualitative information, which necessitates extended periods of concentration, limited distractions, and uninterrupted thought. CCM manages money on a discretionary basis and should not be viewed as a financial consultant or financial planner in relation to the client's overall financial plan. CCM believes that 'Jack of all trades' financial planners are common and accessible to most clients.

Rather than attempting to be a 'Jack of all trades', CCM believes the real potential to add value to clients is via focused, disciplined, and rigorous investment research and money management, which cannot be accomplished without limiting the scope of CCM's work. Schwab provides CCM with access to its institutional trading and custody services, which are typically not available to Schwab retail investors. These services generally are available to independent investment advisors on an unsolicited basis, at no charge to them so long as a total of at least \$10 million of the advisor's clients' assets is maintained in accounts at Schwab Institutional *and is not otherwise contingent upon Advisor committing to Schwab any specific amount of business (assets in custody or trading)*. Schwab's services include brokerage, custody, research and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment. For CCM clients' accounts maintained in its custody, Schwab generally does not charge separately for custody but is compensated by account holders through commissions or other transaction-related fees for securities trades that are executed through Schwab or that settle into Schwab accounts. Schwab also makes available to CCM other products and services that benefit CCM but may not benefit its clients' accounts. Some of these other products and services assist CCM in managing and administering clients' accounts. These include software and other technology that provide access to client account data (such as trade confirmations and account statements); facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts); provide research, pricing information and other market data; facilitate payment of CCM's fees from its clients' accounts; and assist with back-office functions, record keeping and client reporting. Many of these services generally may be used to service all or a substantial number of CCM's accounts. Schwab Institutional also makes available to CCM other services intended to help CCM manage and further develop its business enterprise. These services may include consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance and marketing. In addition, Schwab may make available, arrange and/or pay for these types of services rendered to CCM by independent third parties. Schwab Institutional may discount or waive fees it would

otherwise charge for some of these services or pay all or a part of the fees of a third party providing these services to CCM. While as a fiduciary, CCM endeavors to act in its clients' best interests, and CCM's requirement that clients maintain their assets in accounts at Schwab may be based in part on the benefit to CCM of the availability of some of the foregoing products and services and not solely on the nature, cost or quality of custody and brokerage services provided by Schwab, which may create a potential conflict of interest.

Block Trading and Best Execution Practices

If CCM decides to purchase or sell the same securities for numerous clients at roughly the same time, CCM may combine a client's order with orders of other clients to allow CCM to possibly receive better market executions, and/or lower commission rates and other transaction charges than CCM could get by executing the client's order alone. CCM will allocate securities so purchased or sold, as well as the expenses incurred in the transaction, in the manner that CCM considers to be equitable and consistent with CCM's fiduciary obligations to clients. When placing orders for clients, CCM will attempt to secure the best price and execution possible, which takes into account the potential benefits of receiving research and other services (including quotation and information retrieval equipment) helpful to managing assets for clients.

13: Review of Accounts

Since the management of all client accounts is governed by the CCM Market Model, client accounts are being indirectly monitored, via model updates, on a daily basis. Client accounts tend to be reviewed on a weekly basis if circumstances warrant. During low volatility periods and strong trends, the CCM Market Model will typically recommend a very limited number of changes. Therefore, during periods of low volatility and strong trends, client accounts may not be directly reviewed for several weeks at a time, since a buy-and-hold approach is prudent. Accounts are reviewed by the Chief Investment Officer, Chris Ciovacco. Reviews, like client updates, tend to be more frequent during periods of above average market volatility. Since generating and distributing reports to clients are time consuming tasks, CCM's primary form of communication with clients is done via CCM's blog Short Takes, Twitter, and The Ciovacco Capital Channel on YouTube. Internet updates tend to become more frequent during more volatile market conditions to keep clients informed in uncertain times. CCM believes clients are better served by having CCM dedicate more time to investment research and money management activities rather than spending a considerable amount of time on detailed client reports. The "face time" example described on this [FAQ page](#) provides CCM's basis for communicating efficiently via the internet.

Clients have the ability, via their investment custodian (not CCM), to register for password-protected internet access to their accounts, including real-time balance updates and transaction histories. Clients are encouraged to contact CCM anytime via email or phone to address any questions or concerns. Custodians provide clients with either paper, via the United States Postal Service (USPS), or electronic (at the client's discretion) monthly statements (reports) and trade confirmations. These monthly reports, provided by the client's custodian (not CCM), give detailed information such as change in the account's value vs. the previous month, current value of all account holdings, and a detailed transaction history for the reporting period. These custodian-provided reports, along with 24-hour internet access, which all clients are free to register for and utilize, enable CCM to focus the vast majority of firm resources toward the primary objectives of investment research and money management. All CCM management fees are clearly shown on both custodian-provided reports and via the internet using the custodian's account

history function. In the custodian-provided account history on the internet, CCM fees are designated as “MGMTFEE TO ADVISOR type ADVISOR FEE.” On the custodian-provided monthly statement or account report (delivered via USPS or available on the internet), CCM fees are denoted by Advisor Fee MGMFEE TO ADVISOR.

14: Client Referrals and Other Compensation

CCM does **not** have any arrangements, oral or in writing, where-in it is paid cash by or receives some economic benefit from a non-client in connection with giving advice to clients. CCM is compensated based 100% on the value of client accounts. CCM does not compensate any person, directly or indirectly, for client referrals. No revenue sharing takes place between CCM and any custodian or third-party investment provider.

15: Custody

CCM is not a custodian, nor does CCM have custody of client assets. CCM works with 3rd party custodians, such as Schwab Institutional.

16: Investment Discretion

Once the client completes the CCM Client Agreement and Limited Power of Attorney (LPOA), CCM maintains the authority to determine, without obtaining specific client consent, the securities to be bought or sold, and amount of securities bought or sold.

Termination of Authorizations: Authorizations granted by clients in the CCM Client Agreement and LPOA will remain effective until the client revokes or terminates any of them by giving notice to CCM, either by mail, telephone, facsimile, telegraph, messenger, electronic mail, voice mail or otherwise provided, however that CCM reserves the right to require written notice or confirmation that such authorization has been terminated or revoked. The client may revoke or terminate all authorizations or designations conferred in the CCM Client Agreement and LPOA at any time. Such revocation will not affect the client’s obligation resulting from transactions initiated prior to CCM’s receipt of such notice. After terminating the authorizations granted in the CCM Client Agreement and LPOA with CCM, CCM will not be obligated to honor any further instructions from the client as outlined in the Limited Trading Authorization sections of the CCM Client Agreement and LPOA; the client will have exclusive control over, and responsibility for their account; and unless CCM notifies the client otherwise, the client’s account(s) will become a Schwab retail brokerage account subject to all Schwab’s terms and conditions, including fees and commissions, investment products and other services available to Schwab retail customers. Specific termination policies and terms are outlined in the CCM Client Agreement and LPOA.

Business Continuity Plans – Loss of Key Personnel: Clients and prospective clients should understand there are advantages and disadvantages regarding working with a smaller advisory firm. Some positives include: limited distractions allowing the advisor to stay focused on the primary task at hand. On the negative side, if a smaller firm loses key personnel, it can impact the advisor’s ability to perform their fiduciary duties.

CCM has a business continuity plan in place that includes the death of key personnel. Assets always remain in the client’s name; clients always retain control of their accounts held by the third-party custodian. In the event of the death of key personnel, instructions are in place for the third-party custodian to be notified. The third-party custodian would contact the client and remove the limited power

of attorney for each client account. The client's accounts would revert back to standard retail accounts, allowing clients to resume their due diligence process. Clients can seek out professional assistance from an advisory firm of their choosing once the client account has been "delinked" from CCM by the third-party custodian.

17: Voting Client Securities

CCM Does Not Vote Client Proxies: CCM will not evaluate and/or vote proxies for the clients. This is a question of priorities and allocation of scarce resources. Since CCM tends to focus on investing in asset classes as opposed to individual companies or stocks, the number of proxy votes is somewhat limited. Proxies that are not voted by the shareholder are voted by the Board of Directors of the company or entity acting in the best interests of the shareholders. CCM believes clients are better served by allowing the Board of Directors to vote client proxies allowing CCM's focus to remain on research and money management. In order to reduce mailings and paper, clients may choose to appoint CCM to fulfill the client's responsibilities related to issuer communications and related actions. Clients who make this selection on the Schwab Account Application should understand CCM's policy related to proxy voting. If the client would prefer to receive mailings from issuers and vote their own proxies, they should select "No" on the Schwab Account Application(s) in section Issuer Communications and Related Actions. Clients can change their designation at any time by contacting Schwab or CCM. If the client selects "No" in the Issuer Communications and Related Actions section of the Schwab application(s), the client shall be solely responsible for directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted, and making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the Assets.

18: Financial Information

CCM does not have custody of client funds or securities, nor does CCM require prepayment of more than \$500 in fees per client six or more months in advance. CCM is not required to provide a balance sheet.

19: Requirements for State-Registered Advisers

Chris Ciovacco (CRD #2490913) serves as the Chief Investment Officer for CCM, a position he has held since 1999. Mr. Ciovacco is a highest-honor graduate of the Georgia Institute of Technology's (Georgia Tech) School of Industrial and Systems Engineering. While at Georgia Tech, Mr. Ciovacco worked for IBM in Atlanta from 1985 to 1990 via Georgia Tech's Cooperative Program earning a Cooperative Plan designation with his degree. Prior to taking his current post, Mr. Ciovacco worked at Morgan Stanley in Atlanta as a Financial Advisor from 1994 to 1999. Mr. Ciovacco was born in New York in 1967.

CCM requires the following standards of education or business experience for those involved in determining or giving investment advice to clients:

- A. Bachelor's Degree In Finance, Accounting, or Engineering
- B. Successful completion of the:
 - 1. Series 7 - General Securities Representative Examination
 - 2. Series 65 - Uniform Investment Advisor Law Examination
 - 3. Life & Health Insurance License Exam State of Georgia
- C. At least 20 years of relevant industry experience, including
 - 1. Fundamental analysis
 - 2. Technical analysis

3. Portfolio rebalancing
4. Trend-following techniques

CCM does not engage in any other business activities outside of the management of investment advisory accounts.

The purpose of FORM ADV is to help prospective and current CCM clients understand more fully important information about working with CCM. Current and prospective clients are encouraged to ask for clarification about any information contained in this document. More broadly, clients and prospective clients are encouraged to ask any question at any time. The information, such as phone numbers and email addresses, to contact CCM can be found at <https://www.ccmmarketmodel.com> using the Contact link in the left margin of the firm's website. CCM contact information can be found directly at <https://www.ccmmarketmodel.com/contact-ciovacco-capital/>