

GEBA WEALTH MANAGEMENT



FOR YOUR RECORDS

- **Financial Advisor DANITA M. YETTER**
 - **ADV 2B – Advisor**
 - **BI – Advisor**
- **Firms**
 - **ADV 3 – Cape Investment Advisory**
 - **ADV 2A – Cape Investment Advisory**
 - **Privacy Policy – Cape Investment Advisory**
 - **CRS – American Global Wealth Management**
 - **Cape Investment Advisory – Wrap Fee Program**

Presented By:

Danita Yetter, CFP®

Revised 11/30/2023





*This brochure supplement provides information about **Danita M. Yetter** that supplements the Cape Investment Advisory, Inc. You should have received a copy of that brochure. Please contact **Aldeen Robinson** if you did not receive Cape Investment Advisory's brochure or if you have any questions about the contents of this supplement.*

*Additional information about **Danita M. Yetter** is also available on the SEC's website at www.adviserinfo.sec.gov.*

Cape Investment Advisory, Inc.

Form ADV Part 2B – Individual Disclosure Brochure

for

Danita M. Yetter

Personal CRD Number: 7246906

Investment Adviser Representative

Cape Investment Advisory, Inc.
1362 Mellon Rd #100
Hanover, MD 21076
410-657-8060
danita@geba.com

UPDATED: 11/14/2023

Item 2: Educational Background and Business Experience

Name: Danita M. Yetter

Born: 1971

Educational Background and Professional Designations:

Designations:

CERTIFIED FINANCIAL PLANNER™ Professional

- Sponsored by the Certified Financial Planner Board of Standards, Inc.
- Undergraduate Degree
- 4,000 hours minimum industry experience under another CFP® professional
- Completion of specific graduate level courses including the Financial Planning Process and Principles, Tax Planning, Income and Retirement Planning, Estate Planning, Investment Planning, and Risk Management and Insurance Planning culminating in one final comprehensive examination.

Education:

- B.S. Speech -Language Pathology and Audiology, New York University, NY, 1993
- M.S. Speech-Language Pathology, Syracuse University, NY, 1996

Business background:

- GEBA, Insurance and Financial Consultant, 3/2021- present
- American Global Wealth Management, Inc, Registered Representative, 01/2023- present
- Cape Investment Advisory, Inc, Investment Advisor Representative, 3/2021- present
- Cape Securities, Inc., Registered Representative, 3/2021- 12/2022
- Pruco Securities, LLC, Registered Representative, 2/2020 - 1/2021
- Navy-Marine Corp Relief Society, PT Volunteer Caseworker, 9/2016 - 5/2019

Item 3: Disciplinary Information

Danita M. Yetter has not been subject to any legal or regulatory disciplinary events. Danita M. Yetter has not claimed protection from creditors or ever filed bankruptcy.

Danita Yetter's IAR details can be found on FINRA's BrokerCheck system, www.finra.org/brokercheck or IAP, www.adviserinfo.sec.gov. On both websites, follow the link to begin a search. Then, select "Individual" search. Finally, enter the representative's name and follow the appropriate link to that representative's disclosed information.

Item 4: Other Business Activities

Broker-Dealer Affiliation: Danita M. Yetter may sell securities products to eligible GEBA members (active and retired federal employees) as an independent registered representative of Cape Securities, Inc. ("Cape"), member FINRA, SIPC, MSRB. Danita M. Yetter may also be a commission-receiving independent Cape registered representative for clients who do not fit the definition above and will spend less than 4 hours a month in this capacity. Clients are not obligated to implement any recommendation provided by Ms. Yetter. Neither the Registered Investment Adviser nor Ms. Yetter will earn investment advisory fees in connection with any product implemented in Ms. Yetter's separate capacity as a registered representative where commissions are earned.

Other Financial Business Activity Not Related to Cape: None

Item 5: Additional Compensation

In her role as Financial Advisor of GEBA Wealth Management, Danita M. Yetter receives a salary, plus an annual bonus for her work with eligible GEBA members that is based upon the following considerations:

- a. Ability to achieve pre-determined annual goals
- b. Total new AUM brought in by the company
- c. Total Insurance Revenue that the company earns
- d. Ability to service GEBA membership's legacy Supplemental Retirement Plan

Item 6: Supervision

Aldeen Robinson serves as the Chief Compliance Officer and Director of Operations. Aldeen Robinson is responsible for designing and implementing the firm's supervisory system and may be reached at (678) 583-1120. Cape Investment Advisory, Inc. ("CIA") has implemented a Code of Ethics, a guiding set of principles intended to instruct both the Investment Advisor and each Investment Advisor Representative ("IAR") how to act in a manner that is honest and beneficial to all stakeholders including CIA clients. Further, CIA is subject to regulatory oversight by the Securities Exchange Commission ("SEC") and certain state regulatory agencies who require registration by CIA, its IAR's and associates. As a registered entity, CIA is subject to examinations by its regulators, which may be announced or unannounced. CIA is required to periodically update information provided to these agencies and our clients, including a requirement to provide various reports regarding CIA's business activities and assets.

Item 7: Requirements for State-Registered Advisers

Cape Investment Advisory is an SEC registered investment adviser.

Please note that SEC registration does not imply that the SEC or another agency has sponsored, recommended, or approved the company or its IAR's and does not imply a certain level of skill or training has been achieved.

Certified Financial Planner Board of Standards, Inc. (CFP Board) owns the CFP® certification mark, the CERTIFIED FINANCIAL PLANNER™ certification mark, and the CFP® certification mark (with plaque design) logo in the United States, which it authorizes use of by individuals who successfully complete CFP Board's initial and ongoing certification requirements.

**Regulation Best Interest Information for Danita M. Yetter
Registered Representative of American Global Wealth Management, Inc.**

Introduction

This document provides information about Danita M. Yetter and is a supplement to the American Global Wealth Management, Inc., (AGW), Client Relationship Summary Form (Form CRS), of which you should have received a copy. Please contact AGW Compliance at 770-400-9862 or email compliance@americanglobalwealth.com if you did not receive the firm's Form CRS or if you have any questions about the contents of this supplement. Additional information about Ms. Yetter is available at www.Investor.gov/CRS.

Relationships and Services

General information regarding the services, accounts and investments offered by AGW have been identified in our firm's Form CRS. I believe in understanding a client's needs and goals as we begin our professional relationship. I develop financial solutions which strive to meet these goals and then create diversified portfolios across different sized domestic and international companies, in stable markets as well as emerging. I do analyze equity exposure for clients in the form of third-party money managers, directly managed portfolios, mutual funds, and variable annuities. I believe in evaluating multi-year guaranteed annuities as well as bonds, to fulfill the fixed portion of a client's investments. I believe in managing risk through this diversification as well as investments with minimal correlation with equity markets. I believe in developing a recommended investment strategy based on the client's risk tolerance, investment time horizon, understanding of investments, and how it interacts with the rest of a client's portfolio(s) and future income needs.

Fees, Costs, Conflicts and Standard of Conduct

The information regarding fees, costs, conflicts, and standard of content regarding AGW have been identified in our firm's Form CRS. In addition to my registration with AGW, I am a salaried employee with GEBA, a nonprofit benefit association, which offers financial services and insurance products. I am also an investment advisor representative with Cape Investment Advisory, Inc.

I have an obligation to put your interests before my own interest. I am not compensated based on the type of financial product that is sold or the revenue that it generates. However, a conflict of interest exists in that I am compensated based on meeting pre-determined annual goals associated with increasing GEBA's assets under management. This conflict of interest is managed through AGW's review, approval, or denial of Retail Investor account documents, applications, trading supervision, and representative training. There is no continuing obligation to monitor a brokerage account or product sold. I may have conflicts of interest beyond those disclosed by AGW which will be disclosed verbally, where appropriate, no later than at the time of a recommendation.

Disclosure History

Mrs. Yetter does not have a disclosure history. Additional information may be found on www.Investor.gov/CRS.

My Qualifications

I have been registered in the financial services industry since 2020. I hold the following FINRA licenses: Series 7 and Series 66. I graduated from Syracuse University NY with a Master of Science.



Form ADV Part 3- Client Relationship Summary

8/11/20

Item 1: Introduction

Cape Investment Advisory, Inc (CIA) is an investment adviser registered with the Securities and Exchange Commission offering advisory accounts and services. This document gives you a summary of the types of services and fees we offer. Please visit www.investor.gov/CRS for free, simple tools to research firms and for educational materials about broker-dealers, investment advisers, and investing.

Item 2: Relationships and Services

Questions to ask us: Given my financial situation, should I choose an investment advisory service? Why or why not? How will you choose investments to recommend to me? What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?

What investment services and advice can you provide me? CIA offers and provides a combination of the following advisory services for individuals, businesses, qualified retirement plans, individual retirement accounts, trusts and other entities on based on assets: Discretionary Investment Management (customized investment strategy) • Nondiscretionary investment management (investment strategy that is executed at clients direction) • Financial planning services (we assess your financial situation and provide advice to meet your goals • Retirement plan advisory services • 401(k) Enrollment counseling. Our firm has discretionary management without any material limitations. We limit the types of investments that are recommended since not every type of investment vehicle is needed to create an appropriate portfolio. Our firm does not have a minimum account size. Please also see our Form ADV Part 2A (“Brochure”), specifically Items 4.

Item 3: Fees, Costs, Conflicts and Standard of Conduct

Questions to ask us: Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me? What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have? How might your conflicts of interest affect me, and how will you address them?

What fees will I pay? Our fees vary depending on the services you receive. Additionally, the amount of assets in your account affects our advisory fee; the more assets you have in your advisory account, the more you will pay us and thus we have an incentive to increase those assets in order to increase our fee. Our fixed fee arrangements are based on the amount of work we expect to perform for you, so material changes in that amount of work will affect the advisory fee we quote you. Portfolio management fees are typically charged quarterly or monthly in arrears. Although some client may choose to pay quarterly in advance. CIA fees are due even if you do not have any transactions. The advisory fee paid to us generally does not vary based on the type of investments selected. Please also see Items 4, 5, 6, 7 & 8 of our

Brochure. Third Party Costs: Some investments (e.g., mutual funds, variable annuities, etc.) impose additional fees (e.g., transactional fees and product-level fees) that reduce the value of your investment over time. You will also pay fees to a custodian that will hold your assets. For the wrap fee program, you will not typically pay additional transaction fees and thus our advisory fee is higher than if you paid transaction fees separately. You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying. Please also see our Brochure for additional details.

Conflicts of Interest: When we act as your investment adviser, we must act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice, we provide you. Here are some examples to help you understand what this means.

How do your financial professionals make money? Primarily, we and our financial professionals benefit from the advisory services we provide to you because of the advisory fees we receive from you. This compensation may vary based on different factors, such as those listed above in this Item. CIA has two affiliated broker dealers: American Global Wealth Management (AGW) and Cape Securities, Inc (Cape). Some CIA representatives are also representatives of AGW and/or Cape. When providing services for the AGW or Cape, representatives receive transaction-based fees as opposed to an asset-based fees received for services offered through CIA. Our financial professionals also have the ability to receive commissions when clients purchase insurance products purchased through our firm (life, disability, long-term care, and property and casualty). Such commissions are paid by insurance carriers, not by the client. We receive no additional incentives from insurance carriers by recommending to clients one insurance carrier over another. Please also see Item 10 of our Brochure for additional details.

Item 4: Disciplinary History

Questions to ask us: As a financial professional, do you have any disciplinary history? For what type of conduct?

Do you or your financial professionals have legal or disciplinary history? While CIA does not have any legal or disciplinary events, some of the firm's financial professionals have disclosable legal or disciplinary matters. Visit <https://www.investor.gov/> for a free, simple search tool to research us and our financial professionals.

Item 5: Additional Information

Questions to ask us: Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?

For additional information on our advisory services, see our *Brochure* available at <https://adviserinfo.sec.gov/firm/brochure/146384> and any individual brochure supplement your representative provides. If you have any questions, need additional up-to-date, or want another copy of this Client Relationship Summary, then please contact us at 678-583-1120.



Cape Investment Advisory, Inc.
An SEC Registered Investment Adviser
ADV 2A Disclosure Brochure

March 31, 2021

1600 Pennsylvania Avenue

McDonough, GA 30253

Phone: (678) 583-1120

Fax: (678) 583-1258

This brochure provides information about the qualifications and business practices of Cape Investment Advisory, Inc. If you have any questions about the contents of this brochure, please contact us at (678) 583-1120 or RIACompliance@capesecurities.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Cape Investment Advisory, Inc. also is available on the SEC's website at www.adviserinfo.sec.gov.

Being registered as an SEC Registered Investment Advisor does not imply a certain level of skill or training.

Item 2 - Material Changes

The changes below reflect material changes made since the March 31, 2019 annual update to the brochure.

New Officers Appointed

- David Smith- Chief Compliance Officer
- Aldeen Robinson- Director of Operations

Billing

- In 2021 we anticipate converting some clients from a quarterly billing cycle to monthly

Added New DBAs and removed ones no longer associated.

- See our ADV Schedule D, Section 1.B for the complete list

Affiliate Added

- G.F. Investments LLC

Item 3:

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Item 4: Advisory Business

Firm Description

Cape Investment Advisory, Inc. (“CIA” or “Advisor” or “Sponsor”), solely owned by James R. Webb, is an SEC Registered Investment Adviser that has been in business since March 2008. CIA has filed notices in 33 States and provides investment management and financial planning services primarily to individuals, trusts, and corporations. CIA offers its investment management services on both a discretionary and non-discretionary basis. As of December 31, 2020 the amount of discretionary assets under management was approximately \$202,077,590 and non-discretionary assets under management was approximately \$29,771,964.

Our business model is based on a network of Investment Adviser Representatives (“IARs”) with offices in various locations each having significant flexibility in providing tailored individualized investment advice to clients. While all Cape IARs are registered with, and subject to oversight and supervision by Cape, they operate their businesses independently with some offices working under and providing client services utilizing a separate business name or “DBA.” A list of approved DBA names can be found on our Schedule D, Section 1.B which is available on the SEC’s Investment Advisor Public Disclosure website at www.adviserinfo.sec.gov.

CIA offers and provides a combination of the following advisory services for individuals, businesses, qualified retirement plans, individual retirement accounts, trusts, and other entities on a fee-only basis.

- Discretionary Investment Management
- Nondiscretionary investment management
- Financial planning services
- Retirement plan advisory services

Note that 401(k) Counseling Services are provided using the information and education exception which does not constitute providing investment advice. As such, those assets are not included as assets under management, but represent a significant revenue stream for the entity.

The process begins through personal discussions between the Investment Adviser Representative (“IAR” “or Advisor”) and the client. This interview establishes investment goals, determines suitability, and gathers information pertaining to the client’s financial situation, objectives, time horizon and risk tolerance. This information becomes the basis for determining and constructing the investment plan/asset allocation plan which the Advisor believes is in the best interest of the client’s stated goals.

The investment plan will contain assets in classes that CIA and the IAR believes meets client’s investment objectives. CIA offers clients the opportunity to utilize the services offered by third party money managers.

Discretionary Investment Management

We can provide discretionary portfolio management services to clients using a variety of standard and customized investment strategies. Each portfolio is designed to meet a particular investment objective. We can use this discretionary authority to buy and sell securities on behalf of clients per our advisory agreement.

Nondiscretionary Investment Management

Clients may request that they be informed and agree with the trade recommendation(s) prior to it being entered by the IAR. Typically, this type of investment management is considered “fee in lieu of commission” and is similar to a traditional brokerage account except for how compensation is received. Clients may also occasionally request investments and trades in a discretionary account that are entered as unsolicited trades at the client’s request. In those circumstances the performance of the account may be impacted by such requests as well as impacting the risk and objectives of the account.

Financial Planning Services

Financial planning services are provided to both individual and institutional clients. These plans may be comprehensive in nature or focus on particular areas of interest, at the request of the client. Throughout the time of engagement, clients are obligated to notify Advisor promptly if they experience a change in financial conditions in order to provide Advisor the opportunity to make changes in advice or strategies. CIA may offer an hourly rate for a limited plan related to a specific need such as estate planning only or college funding only.

The client may choose to implement any portion, or none of the plan, at their sole discretion. Advisor will not provide ongoing investment management under a Financial Planning Agreement; however, clients will be able to engage Advisor to conduct a review of investment accounts on a periodic or annual basis for an hourly rate.

CIA and its IARs do not practice law or accounting as officers, directors, managers, employees, or independent contractors of CIA. It is the client’s responsibility to understand the need to secure the services of other professional in these areas when necessary.

Retirement Plan Advisory Services

Investment advisory services provided to a company for their retirement plan vary depending on the scope of the agreement. The scope of the services provided are discussed and agreed upon at the time the agreement is signed, and typically include some or all of the following:

- Retirement Plan Investment Services
 - Advise the plan sponsors investment committee
 - Preparation of an Investment Policy Statement
 - Investment recommendations
 - Investment review and monitoring
 - Education services to the plan committee
- Plan Participant Services
 - Participant enrollment and education
 - One-on-one participant meetings
 - Development and communication of model portfolios
- Plan Design and Construction
 - Plan design consulting
 - Plan search coordination
 - Vendor Search
 - Provider review

Note that 401(k) Counseling Services are provided using the information and education exception which does not constitute providing investment advice. As such, a separate agreement must be obtained to document the services performed and the fee agreed. When engaged, these assets are not included as assets under management.

Broker Dealer Affiliation Disclosure

CIA is affiliated with Cape Securities, Inc (“CSI”), American Global Wealth Management (“AGWM”) and G.F. Investment Services (“GFIS”). It is common for the CIA representative to also serve as a registered representative for CSI and/or AGWM. Some registered representatives have insurance licenses and may recommend insurance products that pay commissions.

Third Party Asset Management

Advisor may recommend that clients engage certain Third-Party Asset Managers (“TPAM”) to manage all or a portion of their assets. Advisor will provide individualized advisory services to their clients through the selection of a suitable TPAM. Factors considered in the selection of a TPAM include, but may not be limited to:

- i) the management style, performance, reputation, pricing and reporting capabilities of the TPAM;
- ii) the client’s risk tolerance, goals and objectives, as well as investment experience; and,
- iii) the amount of client assets available for investment. In order to assist clients in the selection of a TPAM, the IAR will typically gather information from the client about the client’s financial situation, investment objectives, and reasonable restrictions the client wants imposed on the management of the account.

Advisor will review the client’s situation at least annually, or more often as needed or agreed upon with each client, to review the client’s financial situation and objectives, communicate information to the TPAM managing the account as warranted, and to assist the client in understanding and evaluating the services provided by the TPAM. Clients will be expected to notify their Advisor of any changes in their financial situation, investment objectives, or account restrictions.

A complete description of the programs and services provided, the amount of total fees, the payment structure, termination provisions and other aspects of each program are detailed and disclosed in:

- i) the TPAM’s Form ADV Part II;
- ii) the program wrap brochure (if applicable) or other applicable disclosure document(s);
- iii) the disclosure document(s) of the portfolio manager or managers selected; or,
- iv) the TPAM’s account opening documents.

A copy of all relevant disclosure documents of the TPAM and the individual portfolio manager(s) will be provided to anyone interested in these programs/managers. Programs include, but are not limited to:

- 401k Generation
- Alphastar Capital Management
- AssetMark
- Armis Advisers
- Auour Advisory
- Beacon Capital

- BTS Management
- Cardea Capital
- CLS
- Envestnet
- Flexible Plan Investments
- Morningstar
- Betterment
- James Alpha
- Pacific-Life
- SEI

Fees generally include:

- i) management and advisory fees shared by the TPAMs, CIA, and its IARs;
- ii) transaction costs, if applicable, which may be paid to purchase and sell such securities; and
- iii) custody fees.

The amount and timing of these fees vary depending on the TPAM.

The client may elect to participate in a wrap fee account. The account will be managed similarly to non-wrap fee accounts. The primary difference between a wrap account and non-wrap account is in the manner that the account is billed to the client. In a wrap fee account, clients are billed one inclusive fee that includes the cost of the advisor fee, portfolio management fee, platform fee, ticket charges, some service fees, and postage and handling charges. In a non-wrap account, the foregoing charges are assessed as separate charges.

Please Note: When investing in mutual funds and variable annuities, clients are strongly encouraged to review the applicable prospectus. Mutual funds and variable annuities may impose additional fees as well as certain restrictions on the frequency, timing and dollar amount of transactions and may impose penalty fees based upon short-term trading patterns. Such restrictions may impact the services provided by a TPAM.

Item 5: Fees and Compensation

GENERAL FEE INFORMATION

Fees and compensation charged depend on the type and depth of services provided. All advisory services can be terminated within 5 days of signing the Advisory Agreement without penalty (full refund or no fees due) or when Advisor's Form ADV Part II is not delivered at least 48 hours prior to the time of engagement. Otherwise, services can be terminated at any time with written notice.

Fees will be deducted directly from client assets and may be billed monthly or quarterly in arrears or in advance depending on the terms of the agreement. Fees are negotiable subject to the approval of CIA management.

i. Billing In Arrears

Most clients are billed in arrears. The first payment for billing in arrears is due the next quarter or month following the deposit into the account and will be based on the account value at that time. The fee will be assessed on a pro-rata basis calculated from the opening date of the account to the nearest quarter or month of the billing cycle. Thereafter, the fee will be based on the Account value on the last business day of the calendar month or quarter as applicable. Portfolio Adviser will be paid a portion of the fee collected by Cape in accordance with a written agreement between

Portfolio Adviser and Cape. In the event the Client Advisory Services Agreement is terminated Client will be billed for any partial month or quarterly fee incurred on a pro-rata basis. IARs may liquidate assets to cover fees.

ii. Billing In Advance

The first payment for billing in advance is due immediately upon opening and funding the account, as specified in the Advisory Agreement. The fee will be assessed on a pro-rata basis calculated from the opening date of the account to the nearest month or quarter of the billing cycle. Thereafter, the fee will be based on the Account Value on the first business day of the calendar month or quarter. Portfolio Adviser will be paid a portion of the fee collected by Cape in accordance with the written agreement between Portfolio Adviser and Cape. In the event of termination of the Client Advisory Services Agreement, Client will be refunded fees on a pro-rata basis calculated on the number of days left in the billing cycle.

Additional deposits and withdrawals/liquidations to the account in excess of \$25,000 may be subject to the same fee procedures.

A withdrawal/liquidation in excess of \$25,000 will be included in the fee collected on a pro-rata basis. Notwithstanding the foregoing, no advisory fee will be charged on any mutual fund, unit investment trust or annuity transferred into the account that were purchased within five years if a commission was paid to the IAR in their role as a registered representative at an affiliated or unaffiliated broker/dealer.

As authorized in the Advisory Agreement, the account custodian withdraws advisory fees directly from the client's account according to the custodian's policies, practices and procedures. The custodian sends the client a statement at least quarterly, indicating all the amounts disbursed from the account including the amount of advisory fees. It is the client's responsibility, not the custodians, to verify the accuracy of the fee deduction. Since IARs of CIA can also be registered affiliates of CSI and/or AGWM, the broker/dealer has certain supervisory and administrative duties that it is obligated to perform. The custodian of the account holds all customer assets. CIA does not hold customer funds or securities. Fees are never based upon the performance of the account.

Advisors may be licensed as Registered Representatives with CSI and/or AGWM or another broker/dealer. This arrangement may present a conflict of interest to recommend investment products based on the compensation received, rather than on a client's needs. It is against the policy of CIA, CSI, and AGWM to allow an IAR or Representative to put personal interests ahead of client interests. In any transaction that presents a conflict of interest, the client's interest is always the primary interest. In the event a conflict of interest arises, the client will not be billed twice for the same service or transaction. Any investment product recommended by Advisor may be purchased through other brokers and agents unaffiliated with CIA, CSI, or AGWM if the client desires.

Clients should note that the same or similar advisory services may be available elsewhere at a lower or higher cost to the client. Clients should consider that depending upon the level of wrap fee charges, the amount of portfolio activity in their accounts, the value of services that are provided, and other factors, a wrap fee may exceed the aggregate cost of services if they were to be provided separately. A non-wrapped pricing arrangement may be more cost effective for accounts that do not experience frequent trading activity.

The annual fees may be negotiable and based on assets under management as follows:

Asset Amount	Max. Advisor Fee
Up to 250K	2.75%
\$251K - \$500K	2.50%
\$501K - \$1M	2.25%
Above \$1M	2.00%

The asset-based fee is based upon the value of the account as calculated by the custodian.

Tiered Fee Structure

The Advisor Fee is computed using a tiered fee structure when applicable. This means that the entire account balance is broken up into the applicable tiers and the corresponding fee is applied to each sub-balance of the account. For example, a \$2,000,000 account with the fee schedule shown above would result in a Total Annual Client Fee of \$44,375, computed as follows:

$$\text{Client Fee: } (\$250,000 \times 2.75\%) + (\$250,000 \times 2.50\%) + (\$500,000 \times 2.25\%) + (\$1,000,000 \times 2.00\%) = \$44,375$$

Client is responsible for all commissions and other transaction charges (on non-wrap accounts) and any charge relating to the custody of securities in the account. In addition, all fees paid to CIA for investment advisory services are separate and distinct from fees and expenses that may be charged by the mutual fund companies or TPAMs. The mutual fund fees and expenses are described in the fund's prospectus. Clients will also incur brokerage and other transaction costs; please see Item 12 in this brochure for further information.

In certain arrangements with TPAMs, the client may be billed directly by the TPAM. In these situations, CIA will receive a solicitation fee for its services. Notwithstanding this arrangement, the client will not be billed more than the maximum annual fee amount listed and agreed upon in the fee schedule above. All fee arrangements are subject to approval by CIA management.

Financial Planning Fees

CIA's Advisor Representatives may offer personal financial planning services on an hourly or fixed fee basis. Financial planning services can be offered for a fixed fee or on an hourly basis.

The client may choose to implement any portion or none of the plan at their sole discretion. Advisor will not provide ongoing investment management under the Financial Planning Agreement; however, clients will be able to engage Advisor to conduct a review of investment accounts on a periodic or annual basis for the hourly rate noted above.

Consulting, Retirement Plan Services and Other Fees

Fees will be charged either at an hourly rate or by other agreed upon method. The fee will depend on the nature and complexity of the client's consulting needs. All fees are agreed upon prior to entering into a contract. The client will be invoiced at the conclusion of the project, or on a monthly basis, for hourly fees. An upfront deposit may be requested.

ITEM 6: Performance-Based Fees and Side-by-Side Management

CIA does not use Performance-Based Fees and Side-by-Side Management. Therefore, Item 6 is not applicable to CIA's business model.

ITEM 7: Types of Clients

CIA provides discretionary and investment advisory, financial planning, and consulting services on a fee-only basis for individuals, businesses, qualified retirement plans, individual retirement accounts, trusts, and other entities.

CONDITIONS FOR MANAGING ACCOUNTS

CIA generally requires a minimum relationship of \$25,000 for clients seeking investment management service, which may be waived based upon a pre-existing householding relationship or special client circumstances at the discretion of management.

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

PORTFOLIO CONSULTING & MANAGEMENT SERVICES

Product recommendations may include, but are not limited to, equities, ETF's, corporate debt securities, municipal bonds, mutual funds, government securities, alternative investments and options. We select specific investments for your portfolio through the analysis of:

1. Fundamental data
2. Technical considerations
3. Macro-Economic and Geo-political factors

IAR's directly manage and diversify Clients' portfolios based upon the Client's:

- risk profile
- time horizon
- financial goals
- income (current and potential)
- cash flow and liquidity needs
- tax considerations
- portfolio size
- net worth, and
- other various suitability factors

Restrictions and guidelines imposed by Clients affect the composition and performance of portfolios. For this reason, portfolio performance within the same investment objective may differ.

RISK OF LOSS

CIA does not offer performance guarantees on any security or investment strategy. Consult your investment advisor on questions related to your risk analysis. All investments involve risks that can result in loss, including:

- Loss of principal
- A reduction in earnings
- And the loss of future earnings

Additionally, these risks may include but are not limited to:

- Market risk
- Interest rate risk
- Issuer risk
- Inflation risk
- Currency risk
- Political risk
- And general economic risk

Frequent trading can affect portfolio performance, particularly through increased brokerage and other transactional costs (if applicable) and taxes. Additionally, you should be aware that the use of margin, options, and short sales are higher risk strategies. It is possible to lose all of the principal you invest, and sometimes more. In a cash account, your risk is limited to the amount of money that you have invested. In a margin account, your risk includes the amount of money invested plus the amount that has been loaned to you. When you sell a security short, your losses can be infinite.

ITEM 9: Disciplinary Actions

CIA has no Disciplinary Actions. But certain IAR's have actions that are required to be disclosed, including:

- Assault on a Peace Officer, a third-degree felony, which was dismissed at the hearing.
- Two instances of inaccurately completing insurance applications:
 - failure to disclose a felony conviction when a minor – Insurance license was issued with a twelve month probationary period and payment of a \$150 fine;
 - submission of two insurance applications with different responses – the inaccurate application was denied and the accurate one was issued.
- Failure to supervise while a control person at an unaffiliated broker-dealer which resulted in being prohibited from serving in a Principal capacity at any broker-dealer for six months; and
- A Civil Court order to repay credit card debt to the card issuer.

Please review your IAR's Form CRS that documents these situations and feel free to ask your IAR to discuss their background.

ITEM 10: Other Financial Industry Activities & Affiliations

Both CIA and CSI are owned directly by James R. Webb. CSI is a general securities broker/dealer registered with the SEC, FINRA, and various state regulatory agencies. In this capacity, CSI executes trades (as agent) for a commission in mutual funds, equities, ETF's, bonds, options, variable annuities, and other investment products on behalf of clients who may or may not have an Advisory Agreement with CIA. Key principals of CIA also function as officers and/or registered principals of CSI. This relationship may create a conflict of interest, as IARs of CIA may also be receiving a

commission as a registered representative of CSI for effecting securities transactions which they may have recommended to Advisory Clients. Advisory Clients are under no obligation to effect securities transactions through CSI.

Cape Insurance Solutions, Inc. ("CIS") is a state licensed insurance agency which is under common ownership with CIA and is also directly owned by James R Webb. CIS sells life and fixed annuity products which may be offered to CIA clients. When doing so, this relationship may create a conflict of interest as IARs of CIA may also receive a sales-based commission as a CIS agent of the insurance product recommended. Advisory Clients are under no obligation to purchase insurance products through CIS.

American Global Wealth Management, Inc. (AGWM) is a general securities broker/dealer registered with the SEC, FINRA, and various state regulatory agencies. AGWM is owned by American Global Wealth Services, Inc. (a holding company controlled by James R. Webb). In this capacity, AGWM executes trades (as agent) for a commission in mutual funds, EFT's, equities, bonds, options, variable annuities and other investment products on behalf of clients, who may or may not have an Advisory Agreement with CIA. Key principals of CIA also function as officers and/or registered principals of AGWM. This relationship may create a conflict of interest, as IARs of CIA may also be receiving commissions as a registered representative of AGWM for effecting securities transactions which they may have recommended to Advisory Clients. Advisory Clients are under no obligation to effect securities transactions through AGWM.

GF Investment Services, Inc. ("GFIS") is a general securities broker/dealer registered with the SEC, FINRA, and various state regulatory agencies. GFIS was purchased in 2019 and is owned by CenterCore (a holding company controlled by James R. Webb). While the entity is registered as a broker/dealer, no trades are being performed and therefore no trade related conflict of interest exists. GFIS has existing liabilities, including legal matters, which must be resolved prior to making a decision on the company's future prospects.

CIA has certain arrangements with TPAMs whereby the TPAM provides CIA with remuneration for using their services which may present a conflict of interest in relation to the Client relationship. CIA addresses these conflicts of interest by only selecting qualified TPAMs that will competently manage Client assets regardless of the compensation CIA may receive. These arrangements are fully disclosed by CIA to the Client in the contract between CIA, Client, and TPAM.

CIA may recommend Clients establish brokerage accounts with Hilltop Securities, Inc. ("HTS"), Charles Schwab & Co., Inc. ("Schwab"), TD Ameritrade, Inc. ("TD"), Trade PMR, Inc. ("PMR"), or another licensed custodian or FINRA registered broker-dealer, to maintain custody of Clients' assets and to effect trades for their accounts. Although CIA may recommend that Clients establish accounts at HTS, Schwab, TD, or PMR, it is the client's decision to custody assets at a broker-dealer of their choice. CIA is independently owned and operated and not affiliated with HTS, Schwab, TD, or PMR.

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

PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS

CIA IARs may be registered representatives with CSI and/or AGWM which are affiliated broker/dealers. Clients are under no obligation to purchase or sell securities through CSI or AGWM; however, if they choose to implement recommendations within a financial plan, commissions may be earned in addition to any fee paid for advisory services. Fees and

commissions won't be charged for the same services or transactions. The receipt of commissions for recommended products could represent an incentive for the IAR to recommend products that pay a commission over other products that don't or that pay a lower commission than the one(s) recommended, therefore creating a conflict of interest. Additionally, if the client implements the plan through the IAR, clients may be limited to products or services available through CSI or AGWM. Commissions earned may be higher or lower at CSI or AGWM than commissions earned at other broker/dealers. Employees and IAR's of CIA may buy or sell securities that are also held by or recommended to clients thus creating another potential conflict of interest. Employees and IAR's may not enter trades for a security in their own personal account prior to entering the Client's trade in Client accounts.

CODE OF ETHICS

Our Code of Ethics holds CIA IAR's to a high ethical standard. IAR's must place the interest of the Client above their own interest. Advisor will provide a copy of our Code of Ethics to any Client or prospective client upon request.

EDUCATION & BUSINESS STANDARDS

CIA requires IARs to have a college degree or relevant experience in a business similar or related to investment management and/or planning. In addition, IARs will be registered as required by applicable state law or statute. The IARs may also be required to obtain appropriate insurance education and licensing. Additional consideration will be given to those candidates with advance industry designations (e.g., CFP™, ChFC, PFS, etc.)

ITEM 12: Brokerage Practices

INVESTMENT OR BROKERAGE DISCRETION

Because costs associated with trades executed through broker-dealers other than those recommended by CIA will be passed on to the Client in addition to the management fee, best execution will most likely be obtained through the recommended broker/dealer. For this reason, all transactions will generally be executed through the recommended broker/dealer, subject to CIA's duty to obtain "best execution", i.e., a price that is as favorable to clients as possible under the prevailing market conditions. CIA does not warrant or represent that costs for transactions implemented through the recommended broker/dealer will be lower than fees available if Clients use another brokerage firm. CIA believes, however, that the overall level of services and support provided to Clients by Advisor outweighs the potentially lower transactions cost available under other brokerage arrangements.

Persons associated with CIA may also be registered representatives of CSI and/or AGWM, affiliated broker/dealers. In general, CIA may recommend the use of CSI or AGWM to clients for implementation of recommendations, provided the recommendation is consistent with CIA's fiduciary duty to the Client. This may create a conflict of interest, as CIA has business arrangements with CSI and AGWM for the provision of administrative support and other investment-related services. Any commission or other compensation received from the implementation of these recommendations is separate and distinct from CIA's advisory fee. No Client is obligated to use CSI or AGWM to implement any recommended transaction.

Notwithstanding such arrangements, CIA strives to serve the best interest of our Clients. As such, investments for Clients are based on investment suitability for the Client and whether it meets the Client's investment objectives and guidelines. Furthermore, CIA uses its best efforts to obtain the

most favorable net results after considering the share price, size of order, difficulty of execution, confidentiality and skill required of the broker. Clients should be aware that best execution may not necessarily be achieved if recommended transactions are placed through these individuals in their separate capacities as registered representatives or insurance agents/brokers. In addition, CIA does not warrant or represent that commissions for transactions implemented through CSI or AGWM will be lower than commissions available if Client uses another brokerage firm. CIA believes, however, that the overall level of service and support provided to Client by CIA outweighs the potentially lower transactions cost that may be available under brokerage arrangements other than that offered by CIA.

For CIA Client accounts HTS, Schwab, TD, or PMR generally do not charge separately for custody services but are compensated by account holders through commissions and other transaction-related or asset-based fees for securities trades executed through each entity or that settle into HTS, Schwab, TD, or PMR accounts. HTS, Schwab, TD, or PMR also make available to CIA other products and services that benefit CIA but may not benefit its clients' accounts. Some of these other products and services assist CIA in managing and administering clients' accounts, which may 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 CIA's fees from its clients' accounts; and assist with back-office functions, recordkeeping and Client reporting. Many of these services generally may be used to service all or a substantial number of CIA's accounts, including accounts not maintained at HTS, Schwab, TD, or PMR.

Examples of other services may include consulting, publications, information technology, business succession, regulatory compliance and marketing. In addition, they may make available, arrange and/or pay for these types of services rendered to CIA by independent third parties or may discount or waive fees they would otherwise be charged for some of these services or pay all or a part of the fees of a third-party providing these services to CIA.

The foregoing arrangements with HTS, Schwab, TD, or PMR pose a conflict of interest to the extent they create an incentive for CIA to suggest that Clients maintain their assets in accounts at HTS, Schwab, TD, or PMR on the basis of products and services that may become available to CIA as a result, rather than solely on the basis of the nature, cost or quality of custody and brokerage services provided by HTS, Schwab, TD, or PMR to Clients. However, CIA is constrained by fiduciary principles to act in its Clients' best interests and will suggest HTS, Schwab, TD, or PMR to Clients only when appropriate to do so. In addition, CIA maintains an awareness of the services provided to Clients by HTS, Schwab, TD, or PMR in an effort to ensure that Clients are well served.

ITEM 13: Review of Accounts

IARs will review accounts no less than annually or as agreed upon by IAR and Client. Supervisory reviews will occur randomly and/or on the accounts with disproportionate losses and gains. CIA does not provide customized Client statements. These statements will come from the Client's respective custodian.

ITEM 14: Client Referrals & Other Compensation

Employees of CIA may receive commissions from the sale of insurance products and services, working with various insurance companies. Sales transactions will be completed only by licensed

agents. Clients are under no obligation to purchase any insurance products and/or services through agents affiliated with CIA.

The recommended broker/dealers also make available to CIA other products and services that benefit CIA but may not benefit its Clients' accounts. Some of these other products and services assist CIA 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 CIA's fees from its clients' accounts; and assist with back-office functions, recordkeeping, client reporting and/or assist in increased client communication.

Solicitation Arrangements

CIA is party to written agreements with certain Third-Party Asset Managers (TPAMs) under which its IARs provide personal advisory services to their clients. Such personal advisory services include qualifying their clients for a particular TPAM as well as determining client's goals and objectives (determining risk tolerance and investment styles). In doing so, CIA may be acting as a solicitor for that TPAM. CIA and its IARs receive compensation pursuant to these agreements for introducing clients to the TPAM and for providing the aforementioned personal advisory services. This compensation is typically equal to a percentage of the investment advisory fee charged by the TPAM. Because such compensation may differ depending on the individual agreement with each TPAM, the IARs may have an incentive to recommend a particular TPAM over other TPAMs with which CIA has less favorable compensation arrangements or alternative advisory program. Any solicitation or referral arrangements will comply with applicable laws that govern the nature of the service, fees to be paid, disclosures to clients and any necessary client consents.

CIA may enter into a solicitor agreement with a real-estate agent, mortgage broker, accountant, attorney, or other professional where the solicitor can receive compensation based upon the amount of assets brought to CIA. Solicitor compensation is typically equal to a percentage of the investment advisory fee paid by the Client, who is deemed to have become a Client as a result of such individual's direct or indirect efforts. These payments are proportional to the fee charged by us and do not result in an increase in the amount of the fee paid by Client. CIA and its IARs may also be paid by other Investment Advisors for the referral of clients. Any solicitation or referral arrangements will be in writing and in accordance with applicable laws that govern:

- The nature of the service,
- Fees to be paid,
- Disclosures to client and
- Any necessary client consent.

ITEM 15: Custody

Advisor may recommend a broker/dealer and/or custodian. Advisor considers the full range and quality of services in placing accounts, including promptness and accuracy of execution, commission rate, operational capabilities, and the firm's financial condition to ensure compliance with Advisor's best execution policy. Generally, Advisor will recommend that client assets be held in custody at SAL Financial Services, Inc. ("Trade PMR"), Charles Schwab Institutional or TD Ameritrade Institutional. Neither SAL Financial (Trade-PMR), TD Ameritrade Institutional nor

Charles Schwab Institutional are affiliated with CIA.

CIA does not send statements to its clients. Clients receive statements from their respective custodian on a monthly or quarterly basis. Clients also have online access to their account, including statements and confirmations, via their custodian's website. CIA advises Client to review and compare their account statements, which they receive in the mail, with their electronic account statement, to ensure consistency.

ITEM 16: Investment Discretion

Clients who participate in the Advisory Services Program may elect to grant full discretionary investment authority to CIA, IAR and/or TPAM to determine the securities to be bought or sold, the amount of securities to be bought or sold, and the timing of such transactions. This discretionary authority is authorized by the client when the client signs CIA's Advisory Services Agreement. CIA, IAR and/or TPAM can use this authority to replace a Sub-Manager. However, CIA, IAR and/or TPAM will generally only use this grant of discretion to replace Sub-Managers when it deems such change to be necessary; to rebalance a Client's account as agreed between the Advisor and/or Client; and to liquidate sufficient assets to pay the advisory fee when necessary and advisable.

CIA, IAR and/or TPAM will not have the authority to withdraw funds or take custody of client funds or securities other than where the client has authorized the deduction of investment advisory fees via a qualified custodian or at the request of Client to have money withdrawn from their brokerage account and sent to the address of record or an existing bank account registered to Client.

ITEM 17: Voting Client Securities

PROXY VOTING AND CLASS ACTION LAWSUITS

CIA does not vote, nor advise clients how to vote, proxies for securities held in client accounts. CIA clients retain the right to vote the proxies of shares held in their accounts. In addition, CIA will not take any action or render any advice with respect to any securities held in any accounts that are named in or subject to class action lawsuits.

ITEM 18: Financial Information

We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to you and we have not been the subject of a bankruptcy proceeding. Additionally, CIA does not require or solicit prepayment of client fee more than six months in advance, thus a balance sheet is not required to be maintained or provided.

ITEM 19: Requirements for State-Registered Advisers

CIA is an SEC-Registered Investment Advisor



Privacy Statement

Facts	What does Cape Investment Advisory, Inc. do with your personal information?
Why?	Financial companies choose how they share your personally identifiable information (“personal information”). Federal law gives consumers the right to limit some but not all sharing and requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
What?	The types of personal information we collect and share depends on the product or service you have with us. This information includes, but is not limited to: <ul style="list-style-type: none"> • Social Security number and financial account numbers • Account balances and transaction information • Income and employment information • Medical information recorded on a variable life insurance application
How?	All financial companies need to share customers’ personal information to run their everyday business and we share your information as permitted by law. We may share your information to the extent that is prudent to offer you products and services we believe best meet your needs or as you authorize. In the section below we list reasons financial companies can share their customers’ personal information; reasons Cape Investment Advisory chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Cape Investment Advisory, Inc. share?	Can you limit this sharing?
For our everyday business purposes —such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus.	Yes	No
For our marketing purposes —to offer our products and services to you	Yes	No
For our affiliates’ everyday business purposes —information about your transactions and experiences	Yes	No
For our affiliates’ everyday business purposes —information about your creditworthiness	Yes	Yes
For our affiliates to market to you	Yes	Yes
For joint marketing with other financial companies	Yes	Yes
For nonaffiliates to market to you	Yes	Yes

To limit our sharing or for questions

Contact us at Tel. 770-400-9862; Fax 414-352-0117; or Email: riacompliance@capsecurities.com

Please note:

Cape Investment Advisory, Inc. employees and systems provide services to multiple affiliated entities. As a practical matter, sharing can’t be limited in such situations, other than requiring employees have a “need to know” prior to accessing any customer information, a policy which is in effect. If you are a new customer, we can begin sharing your information externally 30 days from the date we sent this notice. When you are no longer our customer, we continue to share your information as described in this notice.

However, you can contact us at any time to notify us to limit our sharing.

Who we are

Who is providing this notice?

Cape Investment Advisory, Inc.

What we do

How does Cape Investment Advisory, Inc. protect my personal information?

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include policies and procedures, computer safeguards, secured files and buildings.

How does Cape Investment Advisory, Inc. collect my personal information?

We collect your personal information when you agree to provide it, for example, when you:

- Open an account or make deposits or withdrawals from your account
- When we buy or sell securities in your account
- Tell us about your other investment or retirement portfolio(s)

We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.

Why can't I limit all sharing?

Federal law gives you the right to limit only:

- Sharing for affiliates' everyday business purposes – information about your creditworthiness
- Affiliates from using your information to market to you
- Sharing with nonaffiliates to market to you

State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.

What happens when I limit sharing for an account I hold jointly with someone else?

Your choice will apply to everyone on your account.

Definitions

Affiliates

Companies related by common ownership or control. They can be financial and nonfinancial companies. Our affiliates include:

- American Global Wealth Management, Inc.
- Cape Securities, Inc.
- Cape Insurance Solutions, Inc.
- Other companies as acquired from time to time

Nonaffiliates

Companies not related by common ownership or control. They can be financial and nonfinancial companies.

- Cape Investment Advisory, Inc. shares with nonaffiliates, such as Hilltop Securities, AlphaStar Capital Management, other custodians such as Charles Schwab and TD Ameritrade, and your investment advisor representative who may have established their own company, so they can market to you.

Joint Marketing

A formal agreement between nonaffiliated financial companies that together market financial products or services to you.

- Cape Investment Advisory, Inc. has entered into marketing agreements with Hilltop Securities, Inc., AlphaStar Capital Management, Charles Schwab, TD Ameritrade as well as other insurance and financial services companies.

Other Important Information

Do Not Call Policy. This notice is the Cape Investment Advisory, Inc. Do Not Call Policy under the Telephone Consumer Protection Act. We do not solicit via telephone numbers listed on the state or federal Do Not Call list, unless the law allows. Associated Persons receive training on how to document and process telephone marketing choices. Consumers who ask not to receive telephone solicitations will be placed on our internal Do Not Call list and will not be called in future campaigns, including those of our affiliates. If you communicate with us by telephone, we may monitor or record the call.

For Nevada residents. We are providing you this notice pursuant to state law. You may be placed on our internal Do Not Call List by calling 770-400-9862. Nevada law requires that we also provide you with the following contact information: Bureau of Consumer Protection, Office of the Nevada Attorney General, 555 E. Washington St., Suite 3900, Las Vegas, NV 89101; Phone number - 702-486-3132; email: BCPINFO@ag.state.nv.us.

For Vermont Residents. In accordance with Vermont law, we will not share information we collect about Vermont residents with companies who are not affiliates, except as permitted by law, such as with your consent or to service your accounts. We will not share information about your creditworthiness with our affiliates without your authorization or consent, but we may share information about our transactions or experiences with you with our affiliates without your consent.

Other Important Information

For California Residents. In accordance with California law, we will not share information we collect about you with nonaffiliates, except as allowed by law. For example, we may share information with your consent or to service your accounts. Among our affiliates, we will limit information sharing to the extent required by California law.

For Insurance Customers in AZ, CA, CT, GA, IL, ME, MA, MN, MT, NV, NJ, NC, OH, OR and VA only. The term "Information" in this part means customer information obtained in an insurance transaction. We may give your Information to state insurance officials, law enforcement, group policy holders about claims experience or auditors as the law allows or requires. We may give your Information to insurance support companies that may keep it or give it to others. We may share medical Information so we can learn if you qualify for coverage, process claims or prevent fraud or if you say we can. To see your Information, write Cape Investment Advisory, Inc. 1600 Pennsylvania Avenue, McDonough, GA 30253. You must state your full name, address, the insurance company, policy number (if relevant) and the Information you want. We will tell you what Information we have. You may see and copy the Information (unless privileged) at our office or ask that we mail you a copy for a fee. If you think any Information is wrong, you must write us. We will let you know what actions we take. If you do not agree with our actions, you may send us a signed, written statement.

For MA Insurance Customers only. You may ask, in writing, for the specific reason(s) for an adverse underwriting decision, which is where we decline your application for insurance, offer to insure you at a higher than standard rate, or terminate your coverage.

Cape Investment Advisory, Inc. is an SEC registered investment advisor.

Mail-In Form

Please Mark Any/All you want to limit.

- Do not share information about my creditworthiness with your affiliates for their everyday business purposes.
- Do not allow your affiliates to use my personal information to market to me.
- Do not share my information for joint marketing with other financial companies.
- Do not share my information for non-affiliates to market to me.
- Do not allow my financial advisor to take my non-public information to a new financial institution should he/she leave Cape Investment Advisory, Inc.

Customer Information to Process the Request

Signature

Name

Address

City, State, Zip

Account/Policy/Contract #

Mail, Fax or Email To:

Cape Investment Advisory, Inc.
1600 Pennsylvania Avenue, McDonough, GA 30253
Fax 414-352-0117
Email: riacompliance@capsecurities.com

American Global Wealth Management, Inc.'s

Business Continuity Planning Disclosure



American Global Wealth Management, Inc. has developed a Business Continuity Plan on how we will respond to events that significantly disrupt our business. Since the timing and impact of disasters and disruptions is unpredictable, we will have to be flexible in responding to actual events as they occur. With that in mind, we are providing you with this information on our business continuity plan.

Contacting Us – If after a significant business disruption you cannot contact us as you usually do at (770) 400-9862 or (414) 352-5050, you should call our alternative number, (770) 691-3378, or go to our web site at americanglobalwealth.com. If you cannot access us through either of those means, you should contact our clearing firm, Hilltop Securities Inc. (HTS), at (800) 678-3792 for instructions on how they may provide access to funds and securities, enter orders, and process other trade-related, cash, and security transfer transactions.

Our Business Continuity Plan – We plan to quickly recover and resume business operations after a significant business disruption and respond by safeguarding our employees and property, making a financial and operational assessment, protecting the firm's books and records, and allowing our customers to transact business. In short, our business continuity plan is designed to permit our firm to resume operations as quickly as possible, given the scope and severity of the significant business disruption.

Our business continuity plan addresses: data backup and recovery; all mission critical systems; financial and operational assessments; alternative communications with customers, employees, and regulators; alternate physical location of employees; critical supplier, contractor, bank and counter-party impact; regulatory reporting; and assuring our customers prompt access to their funds and securities if we are unable to continue our business.

Our clearing firm, HTS, backs up our important records in a geographically separate area. While every emergency poses unique problems based on external factors, such as time of day and the severity of the disruption, we have been advised by our clearing firm that its objective is to restore its own operations and be able to complete existing transactions and accept new transactions and payments within a recovery time period of four hours *and* resumption time of the same day. Your orders and requests for funds and securities could be delayed during this period.

Varying Disruptions – Significant business disruptions can vary in their scope, such as only our firm, a single building housing our firm, the business district where our firm is located, the city where we are located, or the whole region. Within each of these areas, the severity of the disruption can also vary from minimal to severe. In a disruption to only our firm or a building housing our firm, we will transfer our operations to a local site when needed and expect to recover and resume business within four hours the same day. In a disruption affecting our business district, city, or region, we will transfer our operations to a site outside of the affected area and recover and resume business within 24 hours. In either situation, we plan to continue in business, transfer operations to our clearing firm if necessary and notify you through our web site americanglobalwealth.com or our customer emergency number, (770) 691-3378. If the significant business disruption is so severe that it prevents us from remaining in business, we will assure our customer's prompt access to their funds and securities.

For more information – If you have questions about our business continuity planning, you can contact us at (770)400-9862, (414) 352-5050 or info@americanglobalwealth.com. To review our complete business continuity plan, please visit our website at americanglobalwealth.com.

American Global Wealth Management, Inc., November 28, 2022
Form Customer Relationship Summary (CRS)

Introduction

American Global Wealth Management, Inc. (AGWM) is registered with the Securities and Exchange Commission (SEC) and the Financial Regulatory Authority (FINRA) as a broker-dealer. Brokerage services and fees differ from that of an investment advisory firm and it is important for you, a *retail investor*, to understand the differences. There are free and simple tools available to research firms and financial professionals at Investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisers, and investing.

Relationships and Services

What investment services and advice can you provide me?

Description of Services: AGWM offers brokerage services to *retail investors* including the recommendation of investments such as Equities, Options, Bonds, Mutual Funds, Variable Annuities and on a limited basis Alternative Investments. AGWM trades accounts on a non-discretionary basis, meaning the *retail investor* will approve all recommended investments or instruct their financial professional to make a particular investment. All investment products are from third-party sponsors and are **not** proprietary to AGWM. AGWM does not have specific requirements to open an account, although certain products may have a minimum investment level and financial requirements that the *retail investor* must meet such as alternative investments which are non-publicly traded securities. The minimums and financial requirements for these investments may vary by product.

AGWM has an affiliated investment advisor, Cape Investment Advisory, Inc. (Advisor), for which some of its representatives are registered. While AGWM provides services on a transactional basis for a commission, Advisor provides services on a regular basis for a percentage of assets under management.

Conversation Starters; Ask your financial professional:

- “Given my financial situation, should I choose a brokerage service? Why or why not?”
- “How will you choose investments to recommend to me?”
- “What is your relevant experience, including your licenses, education and other qualifications?”
- “What do these qualifications mean?”

Fees, Costs, Conflicts, and Standard of Conduct

What fees will I pay?

Description of Principal Fees and Costs: The principal fees and costs that *retail investors* incur for AGWM’s brokerage services include transaction-based commissions which vary and are charged for each trade or investment. This is considered a conflict of interest because a *retail investor* would be charged more when there are more trades in his or her account, therefore the Firm may have an incentive to encourage a *retail investor* to trade often.

Description of Other Fees and Costs: There are other fees and costs related to AGWM’s brokerage services in addition to the transaction commissions stated above. Common fees that will be paid by a *retail investor* are:

- | | |
|--|---------|
| • Ticket Charge for Equity trades | \$25.00 |
| • Ticket Charge for Option trades | \$45.00 |
| • Ticket Charge for Listed Corporate, Government and other publicly traded Debt Securities | \$40.00 |
| • Ticket Charge for Load/No-Load Mutual Fund Buys & Sales | \$25.00 |
| • Annual IRA Fee for Qualified Plans | \$45.00 |
| • Annual Custody Fee (non-Qualified Accounts) | \$25.00 |
| • Wire Transfer | \$35.00 |

- Annual Account Inactivity Fee \$50.00

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce the amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying. For additional information, please refer to AGWM's Fee Schedule and the Hilltop Correspondent Customer Clearing Brochure Schedule A.

Conversation Starters; Ask your financial professional:

- **“Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?”**
- **“What are your legal obligations to me when providing recommendations? How else does your firm make money and what conflicts of interest do you have?”**

When we provide you with a recommendation we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here is an example to help you understand what this means:

- AGWM makes money from brokerage investments and services provided to *retail investors*. We have incentives which create conflicts of interest for the sale of products including Mutual Funds, Variable Annuities and Alternative Non-publicly Traded Securities. AGWM receives compensation from the sponsors of these products. This compensation varies depending on the sponsor. AGWM may have an incentive to offer products based on the compensation we receive.
- AGWM and its representatives may have an incentive to refer retail investors to the Advisor's services to receive compensation based on assets invested rather than on a transactional basis.
- **“How might your conflicts of interest affect me, and how will you address them?”**
Your financial professional will provide additional information specific to the *retail investor*.
- **“How do your financial professionals make money?”**
Our financial professionals earn commissions based on the products they sell and the trades they make for the *retail investor's* brokerage account. The financial professional may also collect fees based on a percentage of investment assets if registered with the Advisor.

Disciplinary History

“Do you or your financial professionals have legal or disciplinary history?” Yes. Some of our financial professionals currently disclose legal or disciplinary history. Visit Investor.gov/CRS and brokercheck.finra.org for free and simple search tools to research your financial professionals.

Conversation Starter; Ask your financial professional:

- **“As a financial professional, do you have any disciplinary history? For what type of conduct?”**

Additional Information

For additional information about our firm and its services, visit www.americanglobalwealth.com. If you would like additional, up-to-date information or a copy of this disclosure (Form CRS), please call 770-400-9862.

Conversation Starter; Ask your financial professional:

- **“Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?”** Your primary contact will be your financial professional who is a registered representative of AGWM. If you have problems or concerns regarding the way your financial professional is treating you then call our Chief Compliance Officer by phone at 770-400-9862 or by email compliance@americanglobalwealth.com.



Cape Investment Advisory, Inc.

Cape Investment Advisory Wrap Fee Program
Part 2A Appendix 1 of Form ADV: Wrap Fee Disclosure Brochure

1600 Pennsylvania Ave.
McDonough, GA 30253
(678) 583-1120

March 31, 2022

This wrap fee program brochure provides information about the qualifications and business practices of Cape Investment Advisory, Inc. If you have any questions about the contents of this brochure, please contact us at (678) 583-1120. The information contained 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 Cape Investment Advisory also is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2: Material Changes

- Wrap Fee Billing, who bills and frequencies
- Custodians
- Statement provider
- Ability to use MF’s in a portfolio
- Removed info related to financial planning services

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ITEM 4: SERVICES, FEES, AND COMPENSATION

CAPE INVESTMENT ADVISORY WRAP PROGRAM

CIA (“Sponsor”) offers a wrap-fee program to investment advisor representative (“IAR”) clients who use “Sponsor” as an RIA and an approved custodian (broker/dealer) for their managed assets. The program, known as the Cape Investment Advisory Wrap Program, is presented by Sponsor and IAR to the client.

CIA Investment Advisory Representatives (“IAR”) act as portfolio manager to the Cape Investment Advisory Wrap Program. IAR’s work with clients to identify their investment goals and objectives as well as risk tolerance in order to create an initial portfolio allocation designed to complement the client’s financial situation and personal circumstances. Accounts are managed based on each client’s individual needs.

The process begins through personal discussions between the IAR and the client to establish investment goals and gather information pertaining to the client’s financial situation, objectives, time horizon and risk tolerance. This information becomes the basis for determining and constructing the investment plan/asset allocation plan which the IAR and/or Advisor believe best meets the client’s long term stated goals.

The investment plan contains assets in classes that CIA believes (based on historical data) will have attractive combinations of return, risk and correlation. In addition, CIA offers clients the opportunity to use services offered by third party money managers.

Product recommendations under this platform may include but are not limited to, equities, corporate debt securities, municipals bonds, mutual funds, government securities, options, and alternative investments. Restrictions and guidelines imposed by clients effect the composition and performance of portfolios. For this reason, performance of portfolios within the same investment objective may differ.

Advisory client assets are held and processed at an approved custodian (broker/dealer), Charles Schwab, TD Ameritrade, First Clearing (“Trade PMR”), Hilltop Securities (HTS), and SEI.

FEES

Clients in the CIA Wrap Program pay an all-inclusive fee. Fee remittance is as described in the Advisory and/or Sub-Advisory agreement. Fees are generally billed by the Sub-Manager with a portion being remitted to CIA, or CIA and the Sub-Manager may bill their respective portions separately.

Fees charged are calculated as an annual percentage of assets based on the market value of the account at the end of the calendar month or quarter. Fees are billed either monthly or quarter, in advance or in arrears, based on the number of days managed for that period. The level of the fee will vary with the amount of assets under management in the program and the particular investment style and investment alternatives chosen or recommended. Clients should note that the same or similar services may be available elsewhere at a lower or higher cost to the client. Clients should consider that depending upon the level of wrap fee charged, the amount of portfolio activity in their account(s), the value of services provided, and other factors, a wrap fee may exceed the aggregate cost of services if they were to be provided separately. A non-wrapped pricing arrangement may be more cost effective for accounts that do not experience frequent trading activity.

CIA requires a minimum account of \$25,000 for clients seeking investment management services; however, at the sole discretion of management, the minimum account value requirement may be waived.

Below is the schedule of fees charged by CIA in connection with the Cape Investment Advisory Wrap Program. The fee charged is on the value of the funds in the advisory client’s account. All fees are negotiable at the discretion of CIA management.

The annual fees are negotiable and based on assets under management as follows:

Wrap Fee Option

Wrap fee structures allow you to pay an all-inclusive fee which includes:

1. investment management fees shared by our firm, your advisory representatives, and, in some instances, the broker dealer of the advisory representative who is also a registered representative of the broker-dealer;

2. execution and clearing costs;
3. transaction costs – if applicable – which may be paid to purchase and sell securities in your account; and
4. custody fees.

The annual fees for the CIA Wrap Fee Program are negotiable and based on assets under management as follows:

Asset Amount	Max. Client Fee	Execution, Clearing Fee*	Investment Management Fee (TPAM or AAM)
Up to 250K	2.75%	.30	0---2.45%
\$250K --- \$500K	2.50%	.30	0---2.20%
\$500K --- \$1M	2.25%	.25	0---2.00%
\$1M --- \$2M	1.95%	.20	0---1.75%
\$2M--- \$5M	1.65%	.20	0---1.45%
Above \$5M	1.35%	.15	0---1.20%

**Minimum fee of \$350. Execution, custodial, and clearing fee is included in Total Annual Advisory Fee. In certain circumstances the execution, custodial, and clearing fees may be negotiable at the discretion of CIA management.*

The asset-based fee is calculated at the end of the calendar month or quarter. The fee is based upon the value of the account as calculated by the custodian. Fees for the initial quarter will be adjusted pro-rata based upon the number of calendar days in the calendar quarter that the adviser agreement goes into effect. Any deposits or withdrawal of funds or securities within a billing period exceeding \$25,000 are subject to the same billing process.

As authorized in the Advisory Agreement, the account custodian withdraws advisory fees directly from the client's account according to the custodian's policies, practices and procedures. The custodian sends the client a statement, at least quarterly, indicating all the amounts disbursed from the account, including the amount of advisory fees. It is the client's responsibility, not the custodian's, to verify the accuracy of the billing amount. Advisor does not hold customer funds or securities. CIA will not have the authority to withdraw funds or take custody of client funds or securities other than where the client has authorized the deduction of investment advisory fees via a qualified custodian or at the request of Client to have money withdrawn from there brokerage account and sent to the address of record or an existing bank account registered to Client.

OTHER ISSUES RELATING TO FEES

The cost of investment advisory services provided through the programs may be more or less than the cost of purchasing similar services separately. Among the factors impacting the relative cost of the program to a particular Client are the choice of custodian, the size of the account, the type of account (i.e., equity or fixed income), the size of the assets devoted to a particular strategy, and the Sub-Managers selected. The minimum account size varies depending on the selected investment strategy.

The program fee does not cover, and the Client will be additionally responsible and charged for:

- (i) commissions, markups, markdowns, spreads and other transactional charges on securities transactions effected through, or with, brokers and dealers other than their custodian;
- (ii) interest on debit account balances, where applicable;
- (iii) the entire public offering price (including underwriting commissions or discounts) on securities purchased from an underwriter of dealer (including TD AMERITRADE) involved in a distribution of securities;
- (iv) bid-ask spreads;
- (v) odd lot differentials;
- (vi) exchange fees, transfer taxes and other fees required by law;
- (vii) Individual Retirement Account fees, qualified retirement plan account fees and other account maintenance fees; and
- (viii) other fees that may be assessed by custodian in its capacity as broker and custodian upon notice to the Client.

ITEM 5: ACCOUNT REQUIREMENTS AND TYPES OF CLIENTS

CIA provides discretionary and nondiscretionary investment advisory services for individuals, businesses, qualified pension and profit-sharing plans, individual retirement accounts, trusts, and other entities.

CONDITIONS FOR MANAGING ACCOUNTS

CIA generally requires a minimum relationship of \$25,000 for clients seeking investment management services. This minimum may be waived based upon a pre-existing relationship or special client circumstances at the discretion of management.

ITEM 6: PORTFOLIO MANAGER SELECTION AND EVALUATION

The factors we consider when selecting TPAMs to recommend to clients include the TPAM's:

- management style,
- performance record,
- reputation,
- pricing, and
- reporting capabilities.

TPAMs are evaluated using data and information from several sources, including the manager and independent databases. We also review the manager's Form ADV Part 2, as well as portfolio holdings reports that help demonstrate the manager's securities selection process. However, neither we nor a third party verifies the accuracy of performance information or compliance with performance standards.

In recommending a TPAM to you, we consider your financial situation, risk tolerance, investment horizon, liquidity needs, tax considerations, investment objectives, and any other issues important to your state of affairs. Please notify us promptly if there are any changes in your financial situation or investment objectives or if you wish to impose any reasonable restrictions upon the management of your account.

Our IARs can act as a portfolio manager for the CIA managed account program. We do not evaluate these portfolio managers in the same manner that we evaluate TPAMs as described above. You decide whether you want your IAR to manage your assets directly or whether your assets are managed by a third party. We do supervise your IAR as described in the brochure supplement we have provided to you.

CIA offers and provides a combination of the following advisory services for individuals, businesses, qualified pension and profit-sharing plans, individual retirement accounts, trusts and other entities on a fee-only basis.

- Discretionary Investment Management
- Nondiscretionary investment management
- Investment monitoring services

The process begins through personal discussions between the Investment Advisor Representative ("IAR") and the client to establish investment goals and gather information pertaining to the client's financial situation, objectives, time horizon and risk tolerance. This information becomes the basis for determining and constructing the investment plan/asset allocation plan which the Advisor believes best meets the client's long term stated goals. The client reserves the right to impose restrictions on investing in certain securities or types of securities so long as these restrictions are communicated to the Advisor in writing.

The investment plan will contain assets in classes that CIA believes (based on historical data) will have attractive combinations of return, risk, and correlation. In addition, CIA offers clients the opportunity to use services offered by third party money managers as well as affiliated IAR's.

Discretionary Investment Management

We can provide discretionary portfolio management services to clients using a variety of standard and customized investment models. Each portfolio is designed to meet a particular investment objective. We can use this discretionary authority to buy and sell securities on your behalf per client agreements. We may also enter non-solicited trades at the client's request.

Nondiscretionary Investment Management

CIA provides nondiscretionary portfolio management services to clients. IARs use the client's investment objectives and risk tolerance when making recommendations to clients. Trades are entered only with the consent and approval of the client. We may also enter non-solicited trades at the client's request.

Investment Monitoring Services

CIA offers monitoring services to both individual and institutional clients for both qualified and non-qualified accounts. We review asset allocation, the overall performance and that of the individual managers. Reviews are generally conducted on a quarterly basis, although the only requirement is for an annual review. Documentation and communication of the review will be determined between IAR and client.

Broker Dealer Affiliation Disclosure

CIA is affiliated with Cape Securities, Inc. ("CSI"), American Global Wealth Management, Inc. ("AGWM"), and First Asset Financial ("FAF"), all registered broker/dealers. Therefore, it may be common for the CIA representative to also serve as the CSI, AGWM and/or FAF registered representative for clients' account(s).

Third Party Asset Management and Affiliate Asset Management

Advisor may recommend that clients engage certain Third Party Asset Managers ("TPAM") or Affiliate Asset Managers ("AAM") to manage all or a portion of their assets. Advisor will provide individualized advisory services to their clients through the selection of a suitable TPAM or AAM. Factors considered in the selection of a TPAM or AAM include but may not be limited to: i) the management style, performance, reputation, pricing and reporting capabilities of the AAM or TPAM; ii) the client's risk tolerance, goals and objectives, as well as investment experience; and, iii) the amount of client assets available for investment. In order to assist clients in the selection of a TPAM or AAM, the IAR will typically gather information from the client about the client's financial situation, investment objectives, and reasonable restrictions the client wants imposed on the management of the account.

Advisor will contact the client at least annually, or more often as agreed upon with each client, to review the client's financial situation and objectives, communicate information to the TPAM or AAM managing the account as warranted, and to assist the client in understanding and evaluating the services provided by the TPAM or AAM. Clients will be expected to notify their Advisor of any changes in their financial situation, investment objectives, or account restrictions.

A complete description of the programs and services provided, the amount of total fees, the payment structure, termination provisions and other aspects of each program are detailed and disclosed in: i) the TPAM's or AAM's Form ADV Part II; ii) the program wrap brochure (if applicable) or other applicable disclosure documents; iii) the disclosure documents of the portfolio manager or managers selected; or, iv) the TPAM's or AAM's account opening documents. A copy of all relevant disclosure documents of the TPAM or AAM and of the individual portfolio manager(s) will be provided to anyone interested in these programs/managers.

Compensation generally, consists of three elements: i) management and advisory fees shared by the TPAMs or AAMs, CIA, and its IARs; ii) transaction costs – if applicable – which may be paid to purchase and sell such securities; and iii) custody fees. Fees are assessed by the TPAM or AAM who in turn may pay a portion of the fee to CIA for services provided. The amount and timing of these fees varies depending on the TPAM or AAM.

The client may elect to participate in a wrap fee account. The account will be managed similarly to non-wrap fee accounts. The primary difference in between a wrap account and non-wrap account is in the manner that the account is billed to the client. In a wrap fee account, clients are billed one inclusive fee that includes the cost of the advisor fee, portfolio management fee, platform fee, ticket charges, postage and handling charges. In a non-wrap account, the foregoing charges are assessed as separate charges. If a client elects to participate in a wrap fee account, an additional Wrap Fee Disclosure Brochure, Part 2A Appendix I, will be provided to the client.

Please Note: When investing in mutual funds and variable annuities, clients are strongly encouraged to review the applicable prospectus. Mutual funds and variable annuities may impose certain restrictions on the frequency, timing and dollar amount of transactions and may impose penalty fees based upon short-term

trading patterns. Such restrictions may impact the services provided by a TPAM or AAM.

INVESTMENT MANAGEMENT PROCESS

CIA's Portfolio Management team uses a number of analytical tools and commercially available optimization software applications in developing its asset allocation strategies. Among the factors considered in designing these strategies are historical rates of risk and return for various asset classes, correlation across asset classes and risk premiums.

In some cases, CIA will use Sub-managers to construct a model portfolio that Advisor will use to invest Client assets. In some cases, Sub-Managers construct a model portfolio that CIA will use to invest Client assets. CIA may recommend investments in certain mutual funds or alternative investments, such as hedge funds and private equity funds, depending on an individual Client's investment objectives and available assets for investment.

The CIA Wrap Program is intended to comply with Rule 3a-4 under the Investment Company Act of 1940. Each Client's account is managed on the basis of the Client's individual financial situation. Each Client has the opportunity to select the account's investment objective and impose reasonable restrictions on the management of the assets in the account. In addition, Clients will be contacted annually and notified quarterly by their Advisor, in order to confirm the accuracy of this information.

TYPES OF INVESTMENTS

CIA selects and monitors the investment managers who make investment decisions. Through the Wrap Program, CIA evaluates Sub-Managers specializing in each of the asset categories listed, including equities (both domestic and foreign), ETF corporate debt, commercial paper, certificates of deposit, municipal securities, mutual funds, government securities, options and futures. CIA will recommend an asset allocation (and Sub-Managers within an asset category) based upon the Client's needs and objectives. In some cases, Sub-Managers will supply CIA with a model portfolio and CIA will invest Client assets accordingly.

PROXY VOTING & CLASS ACTION SUITS

Client agrees that Advisor or Sub-Manager, as applicable, will not vote or advise you how to vote proxies for securities held in your account. The Custodian should promptly send you all proxies and related shareholder communications for the securities held in your account. If you are a plan fiduciary in the case of an account subject to the provisions of the Employee Retirement Income Security Act of 1974 ["ERISA"], you expressly retain the authority and responsibility for the voting of proxies. We are expressly precluded from rendering any advice or taking any action with respect to the voting of proxies.

In addition, CIA will not take any action or render any advice with respect to any securities held in any accounts that are named in or subject to class action lawsuits. CIA will, however, forward to Client any information received by CIA regarding class action legal matters involving any security held in the account.

PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

CIA does not use Performance-Based Fees and Side-by-Side Management. Therefore, Item 6 is not applicable to CIA's business model.

ITEM 7: CLIENT INFORMATION PROVIDED TO PORTFOLIO MANAGERS

Portfolio Managers may be provided with full disclosure of all client information that CIA has in its files. This information is updated as the client informs CIA of any changes to such information and may be given to Portfolio Managers accordingly.

ITEM 8: CLIENT CONTACT WITH PORTFOLIO MANAGERS

CIA places no restrictions on Client contact with portfolio managers but can't guarantee that Portfolio Managers are willing to make contact with Client.

ITEM 9: ADDITIONAL INFORMATION

DISCIPLINARY ACTIONS

CIA has no Disciplinary Actions. But certain IAR's have actions that are required to be disclosed, including:

- Assault on a Peace Officer, a third-degree felony, which was dismissed at the hearing.
- Two instances of inaccurately completing insurance applications:
 - o failure to disclose a felony conviction when a minor – Insurance license was issued with a twelve month probationary period and payment of a \$150 fine;
 - o submission of two insurance applications with different responses – the inaccurate application was denied and the accurate one was issued.
- Failure to supervise while a control person at an unaffiliated broker-dealer which resulted in being prohibited from serving in a Principal capacity at any broker-dealer for six months; and
- A Civil Court order to repay credit card debt to the card issuer.

Please review your IAR's Form CRS that documents these situations and feel free to ask your IAR to discuss their background.

BROKERAGE SERVICES

Client authorizes Sponsor's custodians as the broker of Client's choice ("Broker") for the Accounts to provide trade execution services as indicated in the Client Investment Advisory Agreement and Fee Disclosure. Broker will also be appointed to serve as custodian of the client assets. Services provided by Broker in this capacity are provided pursuant to a separate agreement between Client and Broker. Client acknowledges that by directing brokerage, Client may not receive best execution on transactions for the Accounts. Sub-Managers will have the authority to effect transactions for the Accounts with or through another broker, dealer, or bank if Advisor or Sub-Manager believes that "best execution" of transactions may be obtained through such other broker, dealer, or bank, including any broker/dealer that is affiliated with Advisor, Sponsor or Sub-Manager. Client acknowledges that it may be responsible for additional fees for portfolio transactions executed away from Sponsor's custodian. Client agrees to furnish any such broker, dealer or bank such authorizations as any of them or Advisor may request to implement the provisions of the Agreement.

Client instructs Broker to accept instructions from CIA and Sub-Managers to whom Advisor has delegated investment discretion by providing notice to the Broker in the form of the Broker/custodian application. Client authorizes CIA to open broker/dealer credit accounts at applicable executing brokers, and Client authorizes CIA as attorney-in-fact to give instructions to an appropriate broker. All transactions effected by Sub-Managers for Client's Accounts shall be cleared and settled with the Broker. Sub-Managers may execute transactions through brokers, dealers and banks that have certain arrangements with Advisor, Sponsor and/or Sub-Managers pursuant to which Advisor, Sponsor or Sub-Managers receive credit (toward acquisition of research products and services) for brokerage placed with such firms by Advisor or Sub-Managers.

When CIA or a Sub-Manager deems a transaction to be in the best interests of the Client, as well as other clients of CIA, Advisor or Sub-Manager, to the extent permitted by applicable law and regulation, Sponsor or Sub-Manager is permitted to aggregate multiple client orders to obtain what Sponsor, or Sub-Manager believes will be the most favorable price and/or lower execution costs at the time of execution.

Neither Advisor, Sponsor nor any Sub-Manager will be responsible for any action or inaction taken by any third-party broker, dealer or bank, or any loss incurred by reason of any action or inaction of any broker, dealer or bank.

Client authorizes Sponsor or Sub-Managers to instruct all brokers, dealers, and banks that effect transactions for or with the Accounts to forward confirmations of transactions for Client's Accounts to the Sub-Managers, Platform Manager or Advisor.

INVESTMENT OR BROKERAGE DISCRETION

Clients who participate in Wrap programs may or may not grant discretionary trading authority to CIA.

REPORTS AND REVIEW OF ACCOUNTS

CIA does not provide customized Client statements. These statements will come from the Client's respective custodian. IARs are responsible for reviewing them with the Client at least annually and as market conditions warrant. It is recommended to clients that consistent periodic reviews be made to continually update client information and investment strategies as conditions warrant. The reviews focus on consistency of portfolio investments with investment objectives and risk tolerances. Other factors that may trigger a review include, but are not limited to, changes in market and economic conditions, known changes in the client's financial situation and large deposits and/or withdrawals from the account.

Clients receive confirmations on all transactions, as well as monthly (or quarterly if there is no account activity) statements from the custodian, which outline the clients' current positions and current market value.

TERMINATION

Client has the right to cancel this Agreement within five business days of the later of Advisor's, Sponsor's or Sub Manager's acceptance by giving written notice of such cancellation to Advisor. In such event, any Fees paid by Client shall be refunded to Client, but Client shall be responsible for any transactions executed prior to Advisor's receipt of the written cancellation notice. Thereafter, either party may cancel this Agreement at any time, for any reason, upon receipt of 30 days' prior written notice. Clients will receive a pro-rated refund of any pre-paid quarterly Program Fee, based upon the number of days remaining in the quarter after the termination date.

BUSINESS AFFILIATIONS AND CONFLICTS OF INTEREST

Both CIA and CSI are owned directly by James R. Webb. CSI is a general securities broker/dealer registered with the SEC, FINRA, and various state regulatory agencies. In this capacity, CSI executes trades (as agent) for a commission in mutual funds, equities, ETF's, bonds, options, variable annuities, and other investment products on behalf of clients who may or may not have an Advisory Agreement with CIA. Key principals of CIA also function as officers and/or registered principals of CSI. This relationship may create a conflict of interest, as CSI may also be receiving a commission as the broker-dealer for effecting securities transactions which may have recommended by IAR's to Advisory Clients. IAR's, as registered representatives of CSI, may also earn brokerage commission from transactions generated from other brokerage account activity, including other brokerage accounts maintained for the Client. Advisory Clients are under no obligation to effect securities transactions through CSI.

Cape Insurance Solutions, Inc. ("CIS") is a state licensed insurance agency which is under common ownership with CIA and is also directly owned by James R Webb. CIS sells life and fixed annuity products which may be offered to CIA clients. When doing so, this relationship may create a conflict of interest as IARs of CIA, as insurance agents, may also receive a sales-based commission as a CIS agent of the insurance product recommended. Advisory Clients are under no obligation to purchase insurance products through CIS.

American Global Wealth Management, Inc. ("AGWM") is a general securities broker/dealer registered with the SEC, FINRA, and various state regulatory agencies. AGWM is owned by American Global Wealth Services, Inc. (a holding company controlled by James R. Webb). In this capacity, AGWM executes trades (as agent) for a commission in mutual funds, EFT's, equities, bonds, options, variable annuities and other investment products on behalf of clients, who may or may not have an Advisory Agreement with CIA. Key principals of CIA also function as officers and/or registered principals of AGWM. This relationship may create a conflict of interest, as AGWM may also be receiving commissions as the broker-dealer for effecting securities transactions which they may have recommended by IAR's to Advisory Clients. IAR's, as registered representatives of AGWM, may also earn brokerage commission from transactions generated from other brokerage account activity, including other brokerage accounts maintained for the Client. Advisory Clients are under no obligation to effect securities transactions through AGWM.

First Asset Financial, Inc. ("FAF") is a general securities broker/dealer registered with the SEC, FINRA, and various state regulatory agencies. FAF is owned by American Global Wealth Services, Inc. (a holding company controlled by James R. Webb). In this capacity, FAF executes trades (as agent) for a commission in mutual funds, EFT's, equities, bonds, options, variable annuities and other investment products on behalf of clients, who may or may not have an Advisory Agreement with CIA. Key principals of CIA also may function as officers and/or registered principals of FAF. This relationship may create a conflict of interest, as FAF may also be receiving commissions as for effecting securities transactions which they may have recommended by IAR's to Advisory Clients. IAR's, as registered representatives of FAF, may also earn brokerage commission from transactions generated from other brokerage account activity, including other brokerage accounts maintained for the Client. Advisory Clients are under no obligation to effect securities transactions through FAF.

CIA has certain arrangements with TPAMs whereby the TPAM provides CIA with remuneration for using their services which may present a conflict of interest in relation to the Client relationship. CIA addresses these conflicts of interest by only selecting qualified TPAMs that will competently manage Client assets regardless of the compensation CIA may receive. These arrangements are fully disclosed by CIA to the Client in the contract between CIA, Client, and TPAM.

CIA may recommend Clients establish brokerage accounts with Hilltop Securities, Inc. (“HTS”), Charles Schwab & Co., Inc. (“Schwab”), TD Ameritrade, Inc. (“TD”), First Clearing for Trade PMR, Inc. (“PMR”), SEI, or another licensed custodian or FINRA registered broker-dealer, to maintain custody of Clients’ assets and to effect trades for their accounts. Although CIA may recommend Clients establish accounts at HTS, Schwab, TD, PMR, or SEI it is the client’s decision to custody assets at a broker-dealer of their choice. CIA is independently owned and operated and not affiliated with HTS, Schwab, TD, PMR or SEI.

CIA and its investment personnel may give advice and take action in the performance of their duties to the wrap program clients, which differ from advice given, or the timing and nature of action taken, with respect to other clients’ accounts. In addition, CIA Representatives have an interest in minimizing transactions in Cape Investment Advisory Wrap Program as the advisory representative pays the transaction costs paid to the custodian.

Advice offered by related persons of CIA may involve investments in mutual funds. Load and no-load mutual funds may pay annual distribution charges, sometimes referred to as 12b-1 fees. These fees come from fund assets, and thus, indirectly from the client’s assets. These 12b-1 fees may be initially paid to the broker-dealer who maintains your account with a portion being allocated to related persons who are also registered affiliates of the firm. The receipt of these funds could represent an incentive for Advisory Representatives to recommend funds with 12b-1 fees or higher fees over funds with no fees or lower fees, therefore creating a potential conflict of interest. As a matter of best execution, MF’s that pay a 12b-1 will be discouraged, as they are rarely in the best interest of the client.

Advisor may recommend a broker/dealer and/or custodian. Advisor considers the full range and quality of services in placing accounts, including promptness and accuracy of execution, commission rate, operational capabilities, and the firm’s financial condition to ensure compliance with Advisor’s best execution policy. For clients assets held at Hilltop Securities, Inc. (HTS) a registered broker/dealer, the trades will be executed through HTS. For assets held at Charles Schwab a registered broker/dealer the trades will be executed through Charles Schwab. For assets held at TD Ameritrade a registered broker/dealer trades will be executed through TD Ameritrade. For assets held at Trade PMR who utilizes First Clearing as a registered broker-dealer, trades will be executed through First Clearing. For assets held at SEI, trades will be executed according to their procedures. Neither Hilltop Securities, Charles Schwab nor TD Ameritrade, First Clearing nor SEI are affiliated with CIA. This applies to other custodians as well, such as mutual fund and insurance companies.

PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS

IARs of CIA may also be registered representatives with CSI, AGWM or FAF, affiliated broker/dealers. Clients are under no obligation to purchase or sell securities through any affiliated broker-dealer. Fees and commissions won’t be charged for the same services or transactions. The receipt of commissions for recommended products could represent an incentive for the IAR to recommend products that pay a commission over other products, therefore creating a conflict of interest. Commissions earned may be higher or lower at CSI, AGWM or FAF than commissions earned at other broker/dealers. Employees and advisors of CIA may buy or sell securities that are also held by clients thus creating a potential conflict of interest. These individuals may not enter trades for a security in their own personal account before entering trades in client accounts.

CODE OF ETHICS

Our Code of Ethics holds CIA IAR’s to a high ethical standard. IARs must place the interest of the client above their own interest. Advisor will provide a copy of our Code of Ethics to any client or prospective client upon request.

EDUCATION & BUSINESS STANDARDS

CIA requires IARs to have a college degree or relevant experience in a business similar or related to investment management and/or planning. In addition, IARs will be registered as required by applicable state law or statute. The IARs may also be required to obtain appropriate insurance education and licensing. Additional consideration will be given to those candidates with advance industry designations (e.g., CFP™, ChFC, PFS, etc.)

CLIENT REFFERALS AND ADDITIONAL COMPENSATION

Employees of CIA may receive commissions from the sale of insurance products and services, working with various insurance companies. Sales transactions will be completed only by licensed agents. Clients are under no obligation to purchase any insurance products and/or services through agents affiliated with CIA.

The recommended broker/dealers and custodians also makes available to CIA other products and services that benefit CIA but may not benefit its clients' accounts. Some of these other products and services assist CIA 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 CIA's fees from its clients' accounts; and assist with back-office functions, recordkeeping, client reporting and/or assist in increased client communication.

SOLICITATION ARRANGEMENTS

CIA is party to written agreements with certain Third-Party Asset Managers (TPAMs) under which its IARs provide personal advisory services to their clients. Such personal advisory services include: qualifying clients for a particular TPAM as well as determining client's goals and objectives (determining risk tolerance and investment styles). In doing so, CIA may be acting as a solicitor for that TPAM. CIA and its IARs receive compensation pursuant to these agreements for introducing clients to the TPAM and for providing the aforementioned personal advisory services. This compensation is typically equal to a percentage of the investment advisory fee charged by the TPAM. Because such compensation may differ depending on the individual agreement with each TPAM, the IARs may have an incentive to recommend a particular TPAM over other TPAMs with which CIA has less favorable compensation arrangements or alternative advisory programs. Any solicitation or referral arrangements will comply with applicable laws that govern the nature of the service, fees to be paid, disclosures to clients and any necessary client consents.

CIA may enter into a solicitor agreement with a real-estate agent, mortgage broker, accountant, or other professional where the solicitor can receive a percentage of the client asset management fee. We pay these persons a percentage of the fee paid to us by client that are determines to have become clients as a result of such individual's direct or indirect efforts. These payments are a portion of the fee charges buy use and does not result in an increase in the amount of the fee paid by clients. CIA and its IARs may also be paid by other Investment Advisors for the referral of clients. Any solicitation or referral arrangements will complete with applicable laws that govern:

- The nature of the service,
- Fees to be paid,
- Disclosures to clients and
- Any necessary client consents.

FINANCIAL INFORMATION

We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to you and we have not been the subject of a bankruptcy proceeding. Additionally, CIA does not require or solicit prepayment of client fee more than six months in advance, thus a balance sheet is not required to be provided.

ITEM 10: REQUIREMENTS FOR STATE-REGISTERED ADVISERS

CIA is an SEC-Registered Investment Adviser.