

## Item 1. Cover Page ADV Part II Federal Filing

# PVG Asset Management Corporation

PVG Asset Management may be contacted at:

6989 S. University Blvd., Suite 100  
Centennial, CO 80122

Or

24918 Genessee Trail Road  
Golden, CO 80401

Or

13600 49<sup>th</sup> St. North, Suite 133  
Clearwater, FL 33602

Phone 800.777.0818

Email [information@pvgasset.com](mailto:information@pvgasset.com)

Web [www.pvgassetmanagement.com](http://www.pvgassetmanagement.com)

Dated March 30, 2017

### **DISCLOSURE DOCUMENT AND INFORMATIONAL BROCHURE**

This brochure provides information about the qualifications and business practices of PVG Asset Management Corporation. If you have any questions about the contents of this brochure, contact PVG Asset Management by telephone at 800.777.0818 or by email at [information@pvgasset.com](mailto:information@pvgasset.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 PVG Asset Management Corporation also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

PVG Asset Management is a registered as an investment adviser with the Securities and Exchange Commission (SEC). Registration with the SEC is for the purpose of U.S. Government oversight only and does not imply any advisor has achieved a specific level of education, skill or training.

## **Item 2. Material Changes**

Joseph N. Pecoraro, Portfolio Manager, was a Principle in PVG Investment Company, LLC, a limited liability partnership, which allowed investments in long and short security positions, a "hedge" fund. Mr. Pecoraro dissolved this "hedge fund" as of 12/31/2016.

Choice Capital management, LLC is the General Partner of a number of hedge funds investing in long and short security positions and private companies. Patrick Adams is a majority owner of Choice Capital Management, LLC. He no longer has the role of managing member.

Choice Investment Management is the owner of CIM Securities, a broker/dealer. Patrick Adams is a majority owner of Choice Investment Management, LLC. He no longer has the role of managing member.

## **Item 3. Table of Contents**

**The enclosed material is intended for financial consultants and advisers or individual investors considering PVG Asset Management as an asset manager. This material should be read in conjunction with other brochure material.**

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**Brochure Supplement Part 2B for Supervised persons**

## **PVG ADV Part 2A**

### **Item 4. Advisory Business**

- A. PVG Asset Management Corporation, a Colorado Corporation, is owned by Patrick S. Adams, CFA. The company was founded in December 1987 by Joseph N. Pecoraro, CFA, William C. Rahmig, SSA, Nancy C. Van Gelder, and the Invesco Funds Group. On April 1, 2013 Patrick S Adams acquired the remaining 50% interest in PVG from Joseph Pecoraro.
- B. PVG provides asset management services to individuals, financial advisors, institutions, and other parties. As an asset manager, any financial advice provided is incidental to those services. PVG invests client accounts in individual stocks and bonds, Exchange Traded Funds (ETFs), and some mutual funds. Our asset management approach is called “Loss Averse Investing” to emphasize that loss aversion is a primary investment objective, in contrast to tracking market or peer based indices. PVG cannot guarantee against investment losses.
- C. PVG will provide customized investment management services that may include restrictions on the purchase or sale of certain securities within the boundaries of our Loss Averse Investing strategies.
- D. Besides individual accounts, PVG manages accounts for other investment advisors employing the same Loss Averse Investing management approach and strategies applied to other accounts. PVG shares a portion of the total management fees paid to it by any client with other investment advisors.
- E. As of 3/28/2017, PVG managed \$455,172,757 million in assets for 1,999 accounts. As of 12/31/2016 managed \$374,700,00 for 2,046 accounts.

### **Item 5. Fees and Compensation**

- A. PVG charges a base management fee of 2% which is frequently negotiated lower, depending upon client circumstances, account size, and source such as those from financial advisors and broker dealers where PVG may act as a sub-advisor.
- B. PVG generally bills fees quarterly in advance directly to a client’s account or to the client, depending upon client instructions. Exceptions include those where PVG acts as a sub-advisor.
- C. Besides management fees, clients may incur charges from their selected broker/custodian such as custodial fees, trading commissions and internal fund charges. These charges may be negotiated by PVG, the client, or

may be set by the financial advisor or broker/dealer introducing a client to PVG. PVG does not share in any of these fees or charges.

- D. Unearned fees, if a client terminates PVG before any billed fees are earned, are refunded upon the request of the client. The amount refunded is based upon the number of days remaining in a billing period divided by the total days in that billing period. PVG or the client may terminate the investment advisory contract at any time by giving written or electronic, notice.
- E. PVG receives no other compensation, other than management fees billed as described above.

#### **Item 6. Performance Based Fees**

PVG accepts the management of assets and funds for which it is paid a performance based fee, as well as asset based fees. Performance fee details are negotiated individually and must meet requirements set by law. Performance fee structures include fulcrum and typical flat fee plus a percentage of assets. Performance fees may create an incentive to favor one type account over another. PVG addresses this issue by buying and selling essentially the same securities at the same time for all accounts with the same objective. Exceptions may include the use of securities of lesser liquidity or private offerings that are not suitable for the majority of PVG clients.

#### **Item 7. Types of Clients**

PVG manages accounts for individuals, corporate and individual retirement plans, foundations and endowments. Minimum account sizes vary greatly based on individual client considerations and the source of each prospective client.

#### **Item 8. Methods of analysis, Investment Strategies and Risk of Loss**

Loss Averse Investing strategies pursue an “absolute” rather than “relative” return objective. Unlike many other asset managers, we do not attempt to outperform market or peer group indices, an objective which requires remaining invested at all times regardless of market conditions.

We attempt to make money in a volatile market and to reduce volatility and avoid substantial losses during market declines.

PVG believes that security prices are determined by future economic conditions, corporate fundamentals, and the supply and demand for securities, all of which are uncertain in the present but which may be postulated through diligent investment research. Security prices reflect this uncertainty, changing frequently and often to extremes, as institutional and individual investor opinions change, and their willingness to accept risk (valuations) rises and falls.

PVG employs a disciplined investment process designed to capture and profit from secular and cyclical changes in market valuations (trends) that can be anticipated or at least identified.

PVG believes it has greater flexibility to fully exploit market cyclicalities or pricing extremes than many money managers. Our investment process does not require meeting different internal institutional demands like tracking market, asset class, or peer-group benchmarks. Our decisions are not limited to a single asset class, an investment selection style, or by trading restrictions. We make decisions with limited concern for tax implications. Unlike most managers, we use hedging techniques to protect assets from market declines. Our size, organizational structure, and technology allow us to take advantage of market cyclicalities without moving market prices in the process.

PVG's investment process encompasses top-down and bottom-up economic and corporate fundamental research, and technical analysis. Some of our strategies incorporate only technical analysis or moving averages. PVG utilizes a technical algorithm to signal trades in select strategies. This algorithm is predicated on the 20, 50, and 200 Day Moving Averages of the S&P 500 Index. Trading occurs at the thresholds above and below the 200 Day Moving Average and above and below the 20 Day Moving Average. We also incorporate a stop loss to attempt to avoid losses of more than 10% at a given time.

Security selection and management tactics reflect our economic and business views. They are also based on field proven research, including the research and experience of our investment professionals.

A common fundamental emphasis of this research is identifying sustainable and improving sales and earnings growth rates and rising corporate returns on equity, based on new products, management, and other events. A common technical emphasis is on market leadership, institutional sponsorship, and identifying changing supply and demand for asset classes, market sectors, and individual securities.

PVG managers continuously review economic, business and market issues to determine trends, and to confirm or revise our opinions and understand the opinions of others. We continuously review research and price information on a large universe of alternative securities to sort out those most promising for inclusion or sale from portfolios.

Portfolio activity, “turnover”, depends upon changing market trends, often over periods of only a few months, as well as corporate fundamentals. We may quickly reverse decisions, even taking losses to avoid further price deterioration. Purchases and sales are contrarian, based on perceived investor overreaction to news. i.e., portfolios are frequently constructed during declining markets, adjusted during rising markets, and liquidated after gains. Fully invested portfolios typically contain between 10 and 50 individual securities or substantially fewer when Exchange Traded Funds are used for sector exposure and diversification.

Rather than liquidate all securities in a portfolio that may be declining because of a weak market, our managers also “hedge” portfolios against negative market conditions. Hedging is accomplished in most cases with the purchase of an Inverse Exchange Traded Fund or a similar mutual fund that effectively “shorts” a market. These inverse securities are designed to move in the opposite direction of the market which they represent, although they may at times differ. There is no certainty that inverse ETF’s will work always as expected. As an example, a portfolio’s “net long position” or the dollars in an account that are exposed to market risk may range from 100% to 0% without the sale of all securities because of this technique.

PVG solely employs Exchange Traded Funds (ETFs) in the management of some accounts. ETF’s are selected using the same techniques as for individual securities. They most often reflect the same decision process as used for individual securities. ETFs are funds that encompass tens to hundreds of securities. While providing diversification, they sometimes will fail to track the price of their underlying securities. Like mutual funds ETF’s charge an additional internal management fee.

An investment with PVG may differ from other asset managers in several ways.

1. Investment positions are often taken for shorter term gain potential, even though we research the longer-term attractiveness of a business and investment. When securities are not sold, market risk may be “hedged” using mutual or exchange traded funds that short the market. Hedging may also generate short-term gains or losses, even when markets are moving in an opposite direction. In addition, PVG employs

stop losses to avoid risk. Sold or similar stocks may be repurchased if market conditions or our judgment changes.

2. PVG uses all asset classes, including larger and smaller companies by capitalization and international securities, and all styles of security selection in portfolios, including securities often identified as growth and value, and may also use equity or fixed income security derivatives like exchange traded funds. PVG may also utilize individual bond holdings in some accounts that may contain non-investment grade bonds. Portfolios may be more concentrated by industry or market sector than other managers that track typical asset classes or market benchmarks. While this may involve additional risk, it also can avoid performance dilution from lagging groups and sectors.
3. Technical analysis is a component of our management, although we rigorously engage in qualitative and quantitative fundamental economic, business, and corporate research. Behavioral reasons, as indicated by technical measures, are often the reason for the sale of companies or asset classes that continue to have attractive business prospects.
4. Management may pass up the potential for higher returns by selling securities during rising markets in order to protect client assets or limit risk. We may choose to hold money market funds instead of stocks or hedge market risk in a rising but risky market, rather than risk a reversal and capital losses. As a result, PVG clients are subject to greater management decision risk than investors who remain fully invested in diversified portfolios where market risk is greater.
5. Our management process may reduce, but does not eliminate portfolio sensitivity to a declining market. As with all money management, the future is uncertain and results depend heavily on the skill of the investment professionals making decisions. There is no guarantee of results, returns or past performance.

#### **Item 9. Disciplinary Information**

PVG is not subject to any disciplinary actions. None of PVG's principals is subject to any criminal or civil action. None has ever been accused or convicted of any criminal activity.

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

Joseph N. Pecoraro, Portfolio Manager, was a Principle in PVG Investment Company, LLC, a limited liability partnership, which allowed investments in long and short security positions, a "hedge" fund. Mr. Pecoraro

dissolved this “hedge fund” as of 12/31/2016.

Choice Capital management, LLC is the General Partner of a number of hedge funds investing in long and short security positions and private companies. Patrick Adams is a majority owner of Choice Capital Management, LLC. He no longer has the role of managing member.

Choice Investment Management is the owner of CIM Securities, a broker/dealer. Patrick Adams is a majority owner of Choice Investment Management, LLC. He no longer has the role of managing member.

## **Item 11. Code of Ethics**

PVG has adopted written **Policies and Procedures** setting forth standards of conduct expected from corporate personnel. These Policies and Procedures specifically address such issues as Client Privacy, Proxy Voting, and Personal Securities Trading practices.

Complete copies of these Policies may be obtained by request. PVG recognizes that its customers have an expectation that PVG and its affiliates will maintain the confidentiality of customers’ nonpublic personal information. Nonpublic personal information about clients is collected for purposes of managing and administering the client relationship with us. This information is not for resale or transfer to unaffiliated parties and is shared with third parties only to allow us to manage, trade, and administer the account.

PVG may collect information furnished by clients such as client name, address, social security number and beneficiary designation on forms required to establish the accounts with PVG and affiliated companies. This information may contain specific details concerning the assets in the account, and including records of transactions in assets transferred from another financial institution.

Expressly for the purpose of managing and administering the account, PVG may disclose both identification and transaction information to affiliated and nonaffiliated parties such as brokers, transfer agents, mutual fund companies, administrators, or other representatives of the seller or purchaser of assets or a firm that provides valuations for securities. PVG



does not disclose nonpublic personal information about clients to any party, except as directed by client and permitted by law. PVG has installed safeguards to ensure client nonpublic personal information is used by these organizations only for the purpose provided. PVG maintains records on secured computers. All employees are advised of PVG's privacy policies and of the confidential nature of the information they handle.

PVG principals or employees may invest in the same securities as its clients. Securities purchased by employees are in most cases in accounts managed by PVG as any other client, and are entered as trades at the same time as for other client accounts. Employees are required to pre-clear any purchases or sells of individual securities. Employees may not purchase or sell any security in advance or with knowledge that similar action will be taken by the firm. All employee trades are reviewed for consistency with PVG's code of ethics on a quarterly basis.

## **Item 12. Brokerage Practices**

To the extent PVG invests in stocks, bonds, and mutual funds, commissions or other transaction costs are paid from the client account to the broker/dealer/custodian.

Many PVG accounts are "directed", and as such are traded exclusively with the financial consultant/advisor or broker/dealer responsible for the introduction of the account to PVG. PVG may not be authorized to negotiate commissions and may not be able to obtain volume discounts in this situation as opposed to clients that are not directed. A disparity in commission charges may exist between the commissions charged to clients who direct PVG to use the above named broker/dealer and other clients who do not direct PVG to use said broker dealer. PVG does not share in any commissions.

To the extent PVG may invest accounts in funds managed by other firms; these funds may pay a management fee to their respective managers that are deducted from each fund's income. These fees are an indirect expense client accounts. PVG may also from time to time make investments in certain funds where redemption, transaction, or 12b(1) fees may be levied against the client account by the Fund Company or by the Account Custodian. PVG does not share in any of these fees.

PVG may execute undirected institutional security trades through CIM Securities or other broker dealers to achieve "Best Execution". PVG considers the following factors or combination of factors when determining the broker dealer with which to trade: 1.) commission cost per share; 2.)

timeliness and quality of the firm executing the trade; 3.) market impact of the trade including the broker's order flow in the particular security or whether or not the broker "makes a market" in the security; and 4.) any research that a firm may provide to PVG.

**Soft Dollars:** Some accounts managed by PVG generate "soft dollars", whereby the broker executing a trade will pay for services for the benefit of PVG clients based on the volume of commission business conducted.

PVG makes decisions involving "soft dollars" in a manner that satisfies safe harbor requirements provided by Section 28(e) of the Securities Exchange Act of 1934. Under specified conditions, PVG is permitted to utilize a portion of commission dollars generated by trades to pay for investment research and brokerage products and accounting services. If Applicant were to obtain a product (or service) for both research and non-research purposes, it directs payment of only that portion of the cost attributable to research use with soft dollars. Applicant's interest in making such allocations may differ from clients' interest in that Applicant has an incentive to designate as great a portion of the cost as "research" as possible in order to permit payment with "soft dollars".

PVG allocates transactions to broker-dealers for execution on such markets and at such prices and commission rates as in its good faith judgment are in the best interest of the client, taking into consideration primarily available prices and then brokerage commission rates, and other relevant factors such as, the broker-dealer's execution capability, the size of the transaction, the difficulty of execution, the operational facilities of the broker-dealer involved, the risk in positioning a block of securities, the quality of the overall brokerage and research services provided by the broker-dealer, and the value of an ongoing relationship with such broker-dealers without having to demonstrate that such factors are of a direct benefit to a client. PVG may pay a brokerage commission in excess of that which another broker might have charged for effecting the same transaction if PVG determines in good faith that the amount of commission is reasonable in relation to their value of the services provided by the broker-dealer, viewed in terms of either the particular transaction or PVG's overall responsibilities with respect to the account over which it exercises investment discretion.

Applicant may use a client's "soft dollars" to acquire research and other services and products in support of investment decisions for accounts other than the particular account whose transactions generate the commissions.

### **Item 13. Review of Accounts and Other Matters**

Client accounts are generally reconciled daily against custodian records and reviewed daily by the investment staff. Accounts, other than custom accounts, generally hold the same investment positions, based on objective. If a position is bought and sold in one of these accounts, it is typically bought and sold in all accounts with the same objective, except in unusual circumstances.

Clients receive electronic and printed communication from their respective broker/dealer custodians at least monthly. In addition, PVG provides printed or electronic quarterly statements and performance reports, depending upon the request of clients and/or their investment advisor or broker of record.

**Liquidity and Distributions:** Investors in separate accounts may withdraw their funds at any time without penalty or establish periodic distributions.

Investors in other “funds” outside of PVG are subject to the rules of such fund.

**Communication:** Daily, monthly, quarterly, and annual communication concerning economic and market conditions and other subjects is provided by public mail, the internet, and email, as well as by telephone and personal contact. Valuations, performance, and tax reporting are provided as required. Broker/dealer/custodian web sites generally provide clients the ability to view their accounts on a daily basis via websites. Frequency of personal contact may depend upon the requirements of each client as negotiated with PVG.

**Performance** is reported by group or objective and is calculated on a time and dollar weighted basis (TWR) by third party Advent AXYS software for both separate account and Fund investors. Performance is available on both a net of fees and expenses and gross basis.

Individual account and composite group returns are available on request. No model or hypothetical portfolios are used to represent reported performance. Reported performance represents the results of the PVG management team.

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

PVG may use the service of independent contractors to introduce its services to prospective clients. When such introductions are successful, these independent contractors may receive a percentage of the client fees paid to PVG for a specified time period. Other introducing consultants and financial advisors, including those associated with broker/dealers may also receive part of the management fees.

#### **Item 15. Custody**

PVG is not typically in custody of client's cash, bank accounts or securities with regard to advisory accounts. We do not act as trustees on accounts, nor are we a qualified custodian for clients in connection with advisory services provided. PVG acts solely under a limited power of attorney that allows it to manage a client's account and, in some cases bill, a client's custodian for account management per contract. Each client's individual custodian provides asset protection and account data, including statements, that should be compared with any provided by PVG for accuracy.

#### **Item 16. Investment Discretion**

Clients engage PVG with an advisory agreement that includes a power of attorney allowing PVG to buy and sell securities in its discretion. Combined with the appropriate custodian/broker dealer documentation, PVG has the discretion to manage any account in a manner deemed appropriate by PVG.

PVG or the custodian/broker dealer provides all contracts and agreements for client signature. PVG returns to each client its contracts and agreements with a right of rescission.

PVG has some clients that do not allow the Company investment discretion. As a convenience to clients, those clients who have assets in the account they do not want to sell, may designate these assets to be separated into a “non-managed” and sometimes “non-billed” portion of their account. Any client doing so retains responsibility for these specific assets, although continue to be tracked on our portfolio management software.

#### **Item 17. Voting Client Securities**

Clients are required to designate their intention to vote their own security proxies on the chosen custodian’s documentation. If they choose to vote their own proxies, they will receive the documentation directly from the transfer agent or custodian.

On behalf of its clients, PVG will accept authority to vote client securities. PVG will also vote all Mutual Fund proxies. PVG acquires and holds a company’s securities in the portfolio it manages in the expectation of profit. The ability and judgment of management is critical to the investment success of any company. Therefore, PVG will generally not hold securities of companies whose management it questions. As such, PVG casts most of its proxy votes, particularly on routine matters, such as the slate of director nominees, ratification of accountants, changing corporate names and similar matters, in accordance with management recommendations, subject to SEC rule 206(4)-6. PVG does not anticipate conflicts of interest between itself and clients with respect to the voting of securities since we typically own the same securities as our clients or do not own any related securities. Clients may obtain a copy of our voting policies and procedures as well as our voting record upon request.

#### **Item 18. Financial Information**

N/A PVG is not subject to any financial reporting requirements.

#### **Item 19. Requirements for State-Registered Advisers**

N/A PVG is federally registered.

## **Brochure Supplement Part 2B**

### **COVER PAGE PVG ASSET MANAGEMENT CORPORATION**

**24918 Genesee Trail Road  
Golden, CO 80401  
Or  
6898 S. University Blvd, Suite 100  
Centennial CO 80122  
Or  
13600 49<sup>th</sup> St. North, Suite 133  
Clearwater, FL 33602**

**Phone 800.777.0818**

**Email [information@pvgasset.com](mailto:information@pvgasset.com)**

**Web [www.pvgassetmanagement.com](http://www.pvgassetmanagement.com)**

**Dated March 30, 2017**

### **DISCLOSURE DOCUMENT AND INFORMATIONAL BROCHURE**

**This brochure supplement provides information about Patrick S. Adams and Joseph N. Pecoraro that supplements the PVG Asset Management Corporation brochure. You should have received a copy of that brochure. Please contact PVG Asset Management 800.777.0818 if you did not receive PVG Asset Management's brochure or if you have any questions about the contents of this supplement.**

**Additional information about Patrick S. Adams and Joseph N. Pecoraro is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

#### **Patrick S Adams, CFA Chief Executive Officer, Portfolio Manager**

Mr. Adams began his investment career in 1985 as a portfolio manager. He managed funds for Founders/Dreyfus Asset Management from March 1993 through June 1996. He subsequently held the positions of Senior Vice President-Zurich Kemper Investments, 6/96-1/97; Senior Vice President, Berger Associates, Inc. 2/97-5/99; President-Berger Balanced Fund and Select Fund; 8/97-5/99; Executive Vice President-Berger 100 and Growth and Income Funds, 2/97-5/99; President-IPT 100 and IPT Growth and Income Funds (of the Berger Institutional Products Trust), 2/97-5/99. He has been associated with Choice Investment Management since November 1999 and PVG Asset Management since 2008.

Mr. Adams received a Bachelor of Science degree in Finance and Accounting from Ohio State University, an MBA degree in Finance from Xavier University in Cincinnati, Ohio and earned the designation of Chartered Financial Analyst (CFA) in 1989. See below for an explanation of the CFA designation.

### **Legal Disclosures**

Mr. Adams has never been convicted of any felony or misdemeanor that involved investments or an investment related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, or extortion or conspiracy to commit any of these offenses. He is not named in any such proceedings, nor has he been ever found to be involved in such activities. He has never been the subject of any order, judgment, or decree enjoining or otherwise limiting the supervised person from engaging in any investment related activity. Mr. Adams has never been involved in any administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority. He has never been subject to any proceeding from a self-regulatory organization, nor to any proceeding in which his professional attainment, designation, or license was revoked or suspended because of a violation of rules relating to professional conduct.

Mr. Adams receives no direct compensation or economic benefit with regard to PVG Asset Management other than compensation paid by that Company.

### **Rick Garcia, President, Portfolio Manager**

Rick Garcia is the portfolio manager for PVG's technical strategies and his leadership role includes management of the sales and marketing division at PVG Asset Management. He has been in the financial industry for 10 years. Prior experience includes serving as a Stock Broker for Charles Schwab & Company and a Business Development Consultant for Jackson National Life Distributors. Preceding the financial industry, Rick served in the United States Marine Corps for 5 years, with overseas deployment during Operation Enduring Freedom (2001) and Operation Iraqi Freedom (2003). He was honorably discharged as a Sergeant in 2003. He has his BS Finance degree from Metropolitan State College of Denver.

## **Legal Disclosures**

Mr. Garcia has never been convicted of any felony or misdemeanor that involved investments or an investment related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, or extortion or conspiracy to commit any of these offenses. He is not named in any such proceedings, nor has he been ever found to be involved in such activities. He has never been the subject of any order, judgment, or decree enjoining or otherwise limiting the supervised person from engaging in any investment related activity. Mr. Garcia has never been involved in any administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority. He has never been subject to any proceeding from a self-regulatory organization, nor to any proceeding in which his professional attainment, designation, or license was revoked or suspended because of a violation of rules relating to professional conduct.

Mr. Garcia receives no additional compensation or economic benefit with regard to PVG Asset Management other than any paid by that Company.

## **Joseph N. Pecoraro, CFA, Founder, CCO, Portfolio Manager**

Mr. Pecoraro began his career in 1969 as a security analyst with Security Pacific National Bank (now Bank of America) and later with the British investment banking firm of Joseph Sebago in Los Angeles and London. He joined the Oppenheimer Funds, Denver, in 1974 where he served as a Vice President and mutual fund and separate account portfolio manager until 1981. Subsequently, he was a partner and portfolio manager at Alpine Capital Management of Denver which he helped grow until its sale during 1987. At the end of 1987, he was a founder of PVG Asset Management along with the Invesco Funds Group, William C. Rahmig, and Nancy C. Van Gelder.

Mr. Pecoraro received both BA and MS degrees in Economics from California State University, Fullerton, completing this work in 1969, and received his Chartered Financial Analyst (CFA) designation from the Chartered Financial Analyst Institute in 1977. He is a member of the Denver Society of Security Analysts. See below for an explanation of the CFA designation.

## **Legal Disclosures**

Mr. Pecoraro has never been convicted of any felony or misdemeanor that involved investments or an investment related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, or extortion or conspiracy to commit any of these offenses. He is not named in any such proceedings, nor has he been ever found to be involved in such activities. He has never been the subject of any order, judgment, or decree enjoining or otherwise limiting the supervised person from engaging in any



investment related activity. Mr. Pecoraro has never been involved in any administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority. He has never been subject to any proceeding from a self-regulatory organization, nor to any proceeding in which his professional attainment, designation, or license was revoked or suspended because of a violation of rules relating to professional conduct..

Mr. Pecoraro receives no additional compensation or economic benefit with regard to PVG Asset Management other than any paid by that Company.

### **Timothy J. McIntosh, CFP Portfolio Manager**

Mr. McIntosh began his investment career in 1999 as Chief Investment Officer and founder of SIPCO. He oversaw all aspects of major client accounts and served as the lead portfolio manager for the firm's equity and bond portfolios at SIPCO until November 2016. He also served as a Professor of Finance at Eckerd College from 1998 to 2008.

Mr. McIntosh holds a Bachelor of Science Degree in Economics from Florida State University, a Masters of Business Administration (M.B.A) degree from the University of Sarasota-Argosy, and Master of Public Health Degree (M.P.H) from the University of South Florida. He also is a CERTIFIED FINANCIAL PLANNER CFP® . His previous experience before founding SIPCO includes employment with Blue Cross/Blue Shield of Florida and Enterprise Leasing Company. He also is an Army veteran, having served active duty in the Army Military Intelligence Unit. See below for an explanation of the CFP designation.

### **Legal Disclosures**

Mr. McIntosh has never been convicted of any felony or misdemeanor that involved investments or an investment related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, or extortion or conspiracy to commit any of these offenses. He is not named in any such proceedings, nor has he been ever found to be involved in such activities. He has never been the subject of any order, judgment, or decree enjoining or otherwise limiting the supervised person from engaging in any investment related activity. Mr. McIntosh has never been involved in any administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority. He has never been subject to any proceeding from a self-regulatory organization, nor to any proceeding in which his professional attainment, designation, or license was revoked or suspended because of a violation of rules relating to professional conduct.

**Paul M. MacNamara, CFP**  
**Portfolio Manager**

Mr. MacNamara served as CEO for SIPCO from November 2004 until November 2016. He served as the senior market strategist and provided ETF/equity/bond analysis for the firm. He retired from the U.S. Army as a disabled-veteran Lt. Colonel in the Special Forces. Mr. MacNamara holds a Bachelor of Science Degree in Business from Millersville University and a Masters in International Relations from Troy State University. He also is a CERTIFIED FINANCIAL PLANNER CFP®. See below for an explanation of the CFP designation.

**Legal Disclosures**

Mr. MacNamara has never been convicted of any felony or misdemeanor that involved investments or an investment related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, or extortion or conspiracy to commit any of these offenses. He is not named in any such proceedings, nor has he been ever found to be involved in such activities. He has never been the subject of any order, judgment, or decree enjoining or otherwise limiting the supervised person from engaging in any investment related activity.

Mr. MacNamara has never been involved in any administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority. He has never been subject to any proceeding from a self-regulatory organization, nor to any proceeding in which his professional attainment, designation, or license was revoked or suspended because of a violation of rules relating to professional conduct.

**Jana Henderson, Vice President**

An integral member of the PVG team since 2008, Ms. Henderson is the backbone of operation support. In 2010 she assumed management responsibilities across all corporate functions as Director of Operations. As Director of Operations Ms. Henderson executes trades, coordinates new business, oversees financial controls, and manages client reporting. Ms. Henderson received her Engineer of Finance and Economics from Thomas Bata University, Zlin, Czech Republic in 2001.

**Annie Gallegos, Vice President**

Ms. Gallegos currently provides client support, daily portfolio reconciliation, performance reporting and assists in compliance. She also maintains control

procedures and performs data integrity for GIPS audits to ensure accuracy. She earned a Bachelor of Arts Degree in Economics from Northwestern University. Annie Gallegos served as Senior Head Trader and Director of Operations for SIPCO from April 2012 to November 2016. While at SIPCO, she was also an Advent Axys & Moxy Trading specialist. Her previous experience before joining SIPCO included employment with Chicago based Premier Asset Management, LLC. and WaMu Investment, Inc.

**CFA Institute Financial Adviser Statement for SEC Form ADV** Both Mr. Adams and Mr. Pecoraro are Chartered Financial Analysts (CFA).

The Chartered Financial Analyst (CFA) charter is a globally respected, graduate-level investment credential established in 1962 and awarded by CFA Institute — the largest global association of investment professionals.

There are currently more than 90,000 CFA charter holders working in 134 countries. To earn the CFA charter, candidates must: 1) pass three sequential, six-hour examinations; 2) have at least four years of qualified professional investment experience; 3) join CFA Institute as members; and 4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

### **High Ethical Standards**

The CFA Institute Code of Ethics and Standards of Professional Conduct, enforced through an active professional conduct program, require CFA charter holders to:

- Place their clients' interests ahead of their own
- Maintain independence and objectivity
- Act with integrity
- Maintain and improve their professional competence
- Disclose conflicts of interest and legal matters

### **Global Recognition**

Passing the three CFA exams is a difficult feat that requires extensive study (successful candidates report spending an average of 300 hours of study per level). Earning the CFA charter demonstrates mastery of many of the advanced

skills needed for investment analysis and decision making in today's quickly evolving global financial industry. As a result, employers and clients are increasingly seeking CFA charter holders—often making the charter a prerequisite for employment.

Additionally, regulatory bodies in 22 countries and territories recognize the CFA charter as a proxy for meeting certain licensing requirements, and more than 125 colleges and universities around the world have incorporated a majority of the CFA Program curriculum into their own finance courses.

### **Comprehensive and Current Knowledge**

The CFA Program curriculum provides a comprehensive framework of knowledge for investment decision making and is firmly grounded in the knowledge and skills used every day in the investment profession. The three levels of the CFA Program test a proficiency with a wide range of fundamental and advanced investment topics, including ethical and professional standards, fixed-income and equity analysis, alternative and derivative investments, economics, financial reporting standards, portfolio management, and wealth planning.

The CFA Program curriculum is updated every year by experts from around the world to ensure that candidates learn the most relevant and practical new tools, ideas, and investment and wealth management skills to reflect the dynamic and complex nature of the profession.

To learn more about the CFA charter, visit [www.cfainstitute.org](http://www.cfainstitute.org)

**CFP Financial Adviser Statement for SEC Form ADV** Both Mr. McIntosh and Mr. MacNamara are Certified Financial Planners (CFP®).

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

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 71,000 individuals have obtained CFP® certification in the United States.

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

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

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

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

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