DOUBLE DIAMOND INVESTMENT GROUP, LLC

1719 Route 10, Suite 105 Parsippany, NJ 07054

A New Jersey & New York Registered Advisory Firm¹

FIRM BROCHURE, MARCH 2019

This brochure provides information about the qualifications and business practices of Double Diamond Investment Group, LLC ("Double Diamond"). If you have any questions about the content of this brochure, please contact us at 973-352-6680. 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 Double Diamond is also available on the SEC's website at www.adviserinfo.sec.gov.

¹ SEC or State registration does not and should not imply any certain level of skill or training.

MATERIAL CHANGES

Double Diamond has not had any material changes to its advisory services or personnel since the filing of its 2018 Annual ADV amendment.

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Item 4: ADVISORY BUSINESS

<u>A.</u>

Double Diamond was founded in 2010. Double Diamond is owned and managed by its principal, Andrew Bodner. Mr. Bodner has more than 30 years of experience in wealth management.

В.

Investment Management Services:

Double Diamond provides investment management services primarily on a discretionary basis according to the client's investment objectives and the terms and conditions of the Advisory Agreement with the client. Double Diamond's investment management primarily utilizes proprietary Portfolio Models in order to achieve investment results consistent with clients' investment objectives.

Double Diamond's Managed Account Program

In this program, Double Diamond's principal Andrew Bodner, will design an investment program based on the needs of the client to achieve a specific investment goal. This portfolio is also designed to provide an additional layer of diversification for clients that may be invested in other investment strategies. Double Diamond invests according to several models, both taxable and tax-deferred, that allow us to align risk and investment return with a client's stated objective. Through ongoing client conversation, Double Diamond looks to ascertain information that may help us determine whether the client's risk tolerance has, or should be, changed. Within each model, one may find various investments including individual stocks and bonds, mutual funds, ETFs, alternative investments, and more.

Double Diamond also provides boutique advisory services to contracting companies that generally work on publicly financed projects (e.g bridges, roads). Double Diamond provides investment management of retainage dollars so that the contracting companies can receive investment income and/or appreciation during the retainage period.

Double Diamond also sponsors and is a portfolio manager within its' own WRAP program. For more information please refer to Double Diamond's WRAP Brochure (ADV 2A Appendix 1).

<u>C.</u>

Double Diamond investment programs are tailored to the individual needs and objectives of each client. Double Diamond will seek information from clients to assess the proper investment or investment manager allocation in order to achieve their investment goals. Clients may seek security restrictions or limits subject to the acceptance by Double Diamond.

$\frac{\mathbf{D}}{\mathbf{N}/\Delta}$

<u>E.</u>

Double Diamond's current assets under management are approximately \$27 million dollars. Currently all advisory assets are managed on a discretionary basis, with approximately \$21 million managed directly by the firm principal, Andrew Bodner

Item 5: FEES AND COMPENSATION

<u>A.</u>

Double Diamond's investment management fee schedule ("Advisory Fees") for all accounts managed by Double Diamond is based on a percentage of assets (generally net of any debit balances) and is set forth below. The Advisory Fees represent the highest fee that may be charged absent special circumstances:

Account Assets
All assets

Annual Fee 1.75%

Double Diamond's actual fees may be negotiated, and a client may pay more or less than similar clients depending on the particular circumstances of the client, which may include considerations related to size of the client's account, additional and/or differing levels of service or as negotiated. Clients that negotiate fees may end up paying a higher fee than that set forth in the fee schedules above as a result of fluctuations in the client's assets under management and/or account performance.

<u>B.</u>

All Double Diamond clients enter into an *Investment Advisory Agreement* setting forth the terms and conditions under which Double Diamond shall manage the client's assets and a separate custodial/clearing agreement for each designated broker-dealer/custodian. Both the Double Diamond's Agreement and the custodial/clearing agreement authorize the custodian to debit the client's account in the amount of Double Diamond's advisory fee and remit same.

\mathbf{C}

Double Diamond will generally recommend a broker-dealer/custodian for client's investment management assets. In addition to the investment management fee, the client may incur brokerage commissions and/or transaction fees for effecting certain securities transactions (i.e. transaction fees are charged for certain no-load mutual funds, commissions are charged for individual securities transactions). In addition, the client will also incur, relative to all mutual fund and exchange traded fund purchases, charges imposed at the fund level (e.g. management fees and other fund expenses). Please refer to Item 12 which discusses Double Diamond's brokerage practices.

<u>D.</u>

Double Diamond's Advisory Fees shall also be prorated and paid monthly or quarterly, in advance, based upon the market value of the assets on the last business day of the previous quarter. The Agreement between Double Diamond and the client will continue in effect

until terminated by either party. In the event the client terminates Double Diamond's services, the balance of any unearned fee, if any, shall be refunded to the client

<u>E.</u>

Double Diamond's Advisory Affiliates, in their individual capacities are registered representatives of Comprehensive Asset Management and Servicing, Inc. ("Comprehensive"), an SEC registered broker-dealer and member of FINRA. Brokerage commissions may be charged by Comprehensive to effect securities transactions and thereafter, a portion of these commissions may be paid by Comprehensive to Double Diamond's Advisory Affiliates. Prior to effecting any transactions, the client will be required to enter directly into an account agreement with Comprehensive. The brokerage commissions charged by Comprehensive may be higher or lower than those charged by other broker-dealers and the client has the option to purchase these products at another broker-dealer. In addition, certain of the Double Diamond's Advisory Affiliates may also receive additional ongoing 12b-1 fees from the mutual fund company.

A conflict of interest exists to the extent that the Double Diamond recommends the purchase of securities wherein its Advisory Affiliates receive commissions or other additional compensation as a result of clients purchasing securities based upon such recommendations. For ERISA Accounts, Double Diamond will offset its advisory fees by an amount equal to the aggregate commissions and 12b-1 fees earned by the Registrant's Advisory Affiliates in their individual capacities as registered representatives of Comprehensive.

Item 6: PERFORMANCE-BASED FEES and SIDE-BY-SIDE MANAGEMENT

Double Diamond does not charge performance-based fees.

Item 7: TYPES OF CLIENTS

Double Diamond provides investment advisory services to the following clients:

- Individuals and High Net Worth Individuals;
- Trusts, Estates, Charitable Organizations;
- Corporations, Pension Plans & 401(k)

Item 8: METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

<u>A</u>.

Double Diamond seeks to provide income and/or appreciation by applying tactics that provide a substantial portion of the market's upside while simultaneously reducing a portfolio's downside. This may include reducing a position's size as that asset class substantially appreciates or may include increasing a position should the opposite occur. In addition, proper diversification should also alleviate much of the volatility. It also includes constant monitoring of market trends

that may affect a portfolio. Investing in securities or any investment strategy involved risk of loss that clients should be prepared to bear.

<u>B</u>.

Double Diamond does not guarantee the future performance of any account or any specific level of performance, the success of any investment decision or strategy that Double Diamond may use, or the success of Double Diamond's overall investment management. All investment decisions are subject to various market, currency, economic, political, and business risk, and those investment decisions will not always be profitable. Moreover, each client is advised that it remains his/her/its responsibility to promptly notify Double Diamond if there is ever any change in his/her/its financial situation or investment objectives for the purpose of reviewing/evaluating/revising Double Diamond's previous recommendations and/or services.

<u>C</u>. N/A

Item 9: DISCIPLINARY INFORMATION

<u>A/B/C.</u>

Double Diamond and its personnel do not have any legal or disciplinary disclosures responsive to this item.

Item 10: OTHER FINANCIAL INDUSTRY AFFILIATIONS

A/B.

Double Diamond is not affiliated with any other financial institution.

C.

Licensed Insurance Representatives:

Double Diamond's Advisory Affiliates, in their individual capacities, are licensed insurance producers and may recommend the purchase of certain insurance products to its clients. Although Double Diamond does not sell insurance products, it permits its Advisory Affiliates as licensed insurance producers, to sell insurance products to its investment advisory clients. A conflict of interest exists to the extent that Double Diamond's Advisory Affiliates recommend the purchase of insurance products and receive insurance commissions or additional compensation as a result. Such conflict is disclosed at time of sale and in this Brochure to the client.

Registered Representative of Broker-Dealer:

Double Diamond's Advisory Affiliates, in their individual capacities are registered representatives of Comprehensive Asset Management and Servicing, Inc. ("Comprehensive"), an SEC registered broker-dealer and member of FINRA. Brokerage commissions may be charged by Comprehensive to effect securities transactions and thereafter, a portion of these commissions may be paid by Comprehensive to Double Diamond's Advisory Affiliates. Prior to effecting any

transactions, the client will be required to enter directly into an account agreement with Comprehensive. The brokerage commissions charged by Comprehensive may be higher or lower than those charged by other broker-dealers. In addition, certain of the Double Diamond's Advisory Affiliates may also receive additional ongoing 12b-1 fees from the mutual fund company.

A conflict of interest exists to the extent that the Double Diamond recommends the purchase of securities wherein its Advisory Affiliates receive commissions or other additional compensation as a result of clients purchasing securities based upon such recommendations. For ERISA Accounts, Double Diamond will offset its advisory fees by an amount equal to the aggregate commissions and 12b-1 fees earned by the Registrant's Advisory Affiliates in their individual capacities as registered representatives of Comprehensive.

<u>**D.**</u> N/A

Item 11: CODE OF ETHICS, PARTICIPATION IN CLIENT TRANSACTIONS AND PERSONAL TRADING

<u>A.</u>

Double Diamond has implemented a Code of Ethics which serves to establish a standard of business conduct for all of Double Diamond' Associated Persons that is based upon fundamental principles of openness, integrity, honesty and trust, a copy of which is available upon request.

In accordance with Section 204A of the Investment Advisers Act of 1940, Double Diamond also maintains and enforces written policies reasonably designed to prevent the misuse of material non-public information by Double Diamond or any person associated with Double Diamond.

Double Diamond has adopted procedures to implement the firm's policy on personal securities transactions and reviews to monitor and ensure the firm's policy is observed, implemented properly and amended or updated, as appropriate

B/C/D.

Double Diamond and related persons may own an interest in, or buy and sell for their own account, the same securities that may also be held, purchased or sold in client accounts. In all cases, clients' orders are given priority. In no case shall the adviser or associate receive a better price or more favorable circumstance than a client. All associate trades or this type are made for long-term investment objectives and are not intended to benefit from short-term market effects. In some cases, the adviser may buy or sell a specific security for their own account, which the adviser does not consider appropriate for client accounts.

Item 12: BROKERAGE PRACTICES

<u>A.</u>

Double Diamond reviews a multitude of factors to determine which broker-dealer custodian to utilize. Such factors include, but are not limited to, execution quality, price research, operational support and other miscellaneous factors. Double Diamond reviews its custodial relationships on an annual basis to ensure that its clients are receiving best execution.

1. Research and Other Soft Dollar Benefits:

Although not a material consideration when determining whether to recommend that a client utilize the services of a particular broker-dealer/custodian, Double Diamond may receive from a broker-dealer/custodian (or a mutual fund company), without cost (and/or at a discount) support services and/or products, certain of which assist Double Diamond to better monitor and service client accounts maintained at such institutions. Included within the support services that may be obtained by the Double Diamond may be investment-related research, pricing information and market data, software and other technology that provide access to client account data, compliance and/or practice management-related publications, discounted or gratis consulting services, discounted and/or gratis attendance at conferences, meetings, and other educational and/or social events, marketing support, computer hardware and/or software and/or other products used by Double Diamond in furtherance of its investment advisory business operations.

Double Diamond participates in the TD Ameritrade Institutional program. TD Ameritrade Institutional is a division of TD Ameritrade, Inc. ("TD Ameritrade") member FINRA/SIPC/NFA. TD Ameritrade is an independent and unaffiliated SEC-registered broker-dealer. TD Ameritrade offers to independent investment Advisors services which include custody of securities, trade execution, clearance and settlement of transactions. Double Diamond receives some benefits from TD Ameritrade through its participation in the program, as set forth below.

Double Diamond participates in TD Ameritrade's institutional customer program and Double Diamond may recommend TD Ameritrade to Clients for custody and brokerage services. There is no direct link between Double Diamond 's participation in the program and the investment advice it gives to its Clients, although Double Diamond receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving Double Diamond participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to Double Diamond by third party

vendors. TD Ameritrade may also have paid for business consulting and professional services received by Double Diamond's related persons. Some of the products and services made available by TD Ameritrade through the program may benefit Double Diamond but may not benefit its Client accounts. These products or services may assist Double Diamond in managing and administering Client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help Double Diamond manage and further develop its business enterprise. The benefits received by Double Diamond or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, Double Diamond endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by Double Diamond or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the Double Diamond's choice of TD Ameritrade for custody and brokerage services.

As indicated above, certain of the support services and/or products that *may* be received assist Double Diamond in managing and administering client accounts. Others do not directly provide such assistance, but rather assist Double Diamond to manage and further develop its business enterprise. As such, Double Diamond does not have to pay for certain support services which may act as an incentive to select a broker-dealer based on its interests rather than the clients.

Although the existence of the following support services may constitute a conflict of interest, Double Diamond's clients do not pay more for investment transactions effected and/or assets maintained at a particular broker-dealer/custodian as a result of this arrangement. There is no corresponding commitment made by Double Diamond to any particular broker-dealer/custodian or to any other entity to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as a result of the above arrangement.

2. Brokerage for Client Referrals:

Double Diamond does not receive client referrals from any broker-dealer custodian.

3. Directed Brokerage:

Double Diamond does not routinely request, recommend or require that a client direct it to execute transactions through a specified broker-dealer. The client may direct Double Diamond to use a particular broker-dealer (subject to Double Diamond's right to decline and/or terminate the engagement) to execute some or all transactions for the client's account. In such event, the client will negotiate terms and arrangements for the account with that broker-dealer, and Double Diamond will be unable to seek better execution services or prices from other broker-dealers or be able to "bunch" the client's transactions with orders for other client's accounts managed by Double Diamond. As a result, client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case.

<u>B</u>

Double Diamond seeks to execute orders for its clients fairly and equitably. Double Diamond follows written procedures pursuant to which it may, and to the extent consistent with Best Execution, combine purchase or sale orders for the same security for multiple clients (sometimes called "bunching") so that they can be executed at the same time. The procedures for bunching trades may differ depending on the particular strategy or type of investment. Double Diamond is not required to bunch or aggregate orders if it determines that bunching or aggregating is not practical.

When client orders are bunched by Double Diamond, the order with be placed with the broker-dealer custodian for execution. When a bunched order is completely filled, Double Diamond generally will allocate the securities purchased or proceeds of sale among participating accounts based on the purchase or sale order. Adjustments or changes may be made by Double Diamond under certain circumstances, such as to avoid odd lots or excessively small allocations. If the bunched order is filled at different prices, through multiple trades, generally all such participating accounts will receive the average price. When a bunched order is partially filled, Double Diamond' procedures provide that the securities are to be allocated in a manner deemed fair and equitable to clients. Securities must be allocated proportionately based upon the relative size of the particular client's pre-trade designation.

Item 13: REVIEW OF ACCOUNTS

A/B.

Account reviews are conducted on an ongoing basis by Double Diamond's principal, Andrew Bodner. All investment management clients are required to discuss with him their investment objectives, needs and goals and to keep him informed of any changes. All clients are encouraged to meet at least annually with the adviser to comprehensively review financial planning issues, including investment objectives and performance.

<u>C</u>.

Clients are provided with transaction confirmation notices and regular summary account statements directly from the broker-dealer/custodian of the client accounts. Double Diamond may provide a quarterly report summarizing account activity, positions and performance.

Item 14: CLIENT REFERRALS AND OTHER COMPENSATION

<u>A.</u>

As disclosed under Item 12 above, Double Diamond participates in TD Ameritrade's institutional customer program and Double Diamond may recommend TD Ameritrade to Clients for custody and brokerage services. There is no direct link between Double Diamond's participation in the program and the investment advice it gives to its Clients, although Double Diamond receives economic benefits through its participation in the program that arc typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided

without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving Double Diamond participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to Double Diamond by third party vendors. TD Ameritrade may also have paid for business consulting and professional services received by Double Diamond's related persons. Some of the products and services made available by TD Ameritrade through the program may benefit Double Diamond but may not benefit its Client accounts. These products or services may assist Double Diamond in managing and administering Client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help Double Diamond manage and further develop its business enterprise. The benefits received by Double Diamond or its personnel through participation in the program do not depend on the amounts of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, Double Diamond endeavors at all times to put the interests of its clients first, Clients should be aware, however, that the receipt of economic benefits by Double Diamond or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the Double Diamond's choice of TD Ameritrade for custody and brokerage Double Diamond does not receive any economic benefit from any non clients in connection with the advisory services it provides to its clients.

Double Diamond also receives from TD Ameritrade certain additional economic benefits ("Additional Services") that may or may not be offered to any other independent investment Advisors participating in the program. Specifically, the Additional Services include Envestnet.

TD Ameritrade provides the Additional Services to Double Diamond in its sole discretion and at its own expense, and Double Diamond does not pay any fees to TD Ameritrade for the Additional Services. Double Diamond and TD Ameritrade have entered into a separate agreement ("Additional Services Addendum") to govern the terms of the provision of the Additional Services.

Double Diamond's receipt of Additional Services raises potential conflicts of interest. In providing Additional Services to Double Diamond, TD Ameritrade most likely considers the amount and profitability to TD Ameritrade of the assets in, and trades placed for, Double Diamond's Client accounts maintained with TD Ameritrade. TD Ameritrade has the right to terminate the Additional Services Addendum with Double Diamond, in its sole discretion, provided certain conditions are met. Consequently, in order to continue to obtain the Additional Services from TD Ameritrade, Double Diamond may have an incentive to recommend to its Clients that the assets under management by Double Diamond be held in custody with TD Ameritrade and to place transactions for Client accounts with TD Ameritrade. Double Diamond's receipt of Additional Services does not diminish its duty to act in the best interests of its Clients, including to seek best execution of trades for Client accounts.

<u>B</u>.

Double Diamond does not have any contractual engagement with any solicitors or pay any compensation for the receipt of client referrals.

Item 15: CUSTODY

Double Diamond does not maintain custody of client assets. All client assets are custodied with nationally recognized, SEC registered and FINRA member broker-dealer/custodians. All clients receive monthly account statements from the custodian and should carefully review these statements to any reports issued by Double Diamond.

Item 16: INVESTMENT DISCRETION

Double Diamond provides advisory services on a discretionary basis. As such, prior to engaging Double Diamond to provide investment management services, the client will be required to enter into a formal *Investment Advisory Agreement (including a limited power of attorney for discretionary accounts)* with Double Diamond setting forth the terms and conditions which under which Double Diamond shall manage client's assets.

Item 17: VOTING CLIENT SECURITIES

Α.

Double Diamond does not vote client proxies. Double Diamond's clients maintain exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the client's investment assets. Double Diamond and the client shall correspondingly instruct each custodian of the assets to forward to the client copies of all proxies and shareholder communications relating to the client's investment assets. With respect to shareholder class action litigation and similar matters, Registrant generally will not make any filings in connection with any shareholder class action lawsuits involving securities currently or previously held in clients' accounts. Registrant recommends that its clients promptly review these materials, as they identify important deadlines and may require action in the client's part. Registrant will not be required to notify third party custodians or clients who utilize third party custodians of shareholder class action lawsuits and similar matters.

<u>B.</u>

Double Diamond and the client shall correspondingly instruct each custodian of the assets to forward to the client copies of all proxies and shareholder communications relating to the client's investment assets. With respect to shareholder class action litigation and similar matters, Registrant generally will not make any filings in connection with any shareholder class action lawsuits involving securities currently or previously held in clients' accounts. Registrant recommends that its clients promptly review these materials, as they identify important deadlines and may require action in the client's part. Registrant will not be required to notify third party custodians or clients who utilize third party custodians of shareholder class action lawsuits and similar matters.

Item 18: FINANCIAL INFORMATION

A.

Based upon Double Diamond' business practices, use of a qualified custodian and advisory fee procedures, there is no requirement for the disclosure of financial information.

<u>B.</u>

There are no known financial conditions that would impair Double Diamond's ability to meet contractual commitments to clients.

C.

Double Diamond *has not been* the subject of a bankruptcy petition.

Item 19: STATE REQUIREMENTS

<u>**A-C**</u>.

See attached Brochure Supplement.

<u>D.</u>

Mr. Bodner *has not been* involved in any of the events listed below.

- a) An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following: or
- b) An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
 - investments or investment related business;
 - fraud, false statements or omissions;
 - violation of any investment related statute or regulation or SRO rules;
 - wrongful taking of property, bribery, perjury, forgery, counterfeiting;
 - extortion or conspiracy to commit any of these offenses.

E.

Double Diamond and Andrew Bodner do not have any relationship or arrangement with an issuer of securities not listed on ADV Part 2A

DOUBLE DIAMOND INVESTMENT GROUP, LLC

1719 Route 10, Suite 105 Parsippany, NJ 07054

A New Jersey & New York Registered Advisory Firm²

Supervised Persons

Andrew Bodner, President, CFP

BROCHURE SUPPLEMENT, MARCH 2019

This brochure supplement provides information about the investment advisory representatives that supplements Double Diamond Investment Group, LLC ("Double Diamond") brochure. You should have received a copy of that brochure. Please contact Double Diamond at (973) 352-6680 if you did not receive Double Diamond's brochure or if you have any questions about the content of this supplement.

Additional information about the above-referenced Supervised Persons is available on the SEC's website at www.adviserinfo.sec.gov.

² SEC or State registration does not and should not imply any certain level of skill or training.

ANDREW BODNER, CFP

1) Educational and Business Background:

Birth Date: 3/12/1965

Education:

Rider University, B.S. Commerce, 1987 Certified Financial Planner, ("CFP") 2005

• Business Background:

UBS Wealth Management, First Vice President, 1992 – 2009 GMS Group, Assistant Vice President, 1987-1992

2) <u>Disciplinary Information:</u>

Double Diamond is required to disclose the pertinent facts regarding any legal or disciplinary events material to a client's evaluation of Andy Bodner. Double Diamond has no information to disclose in relation to this Item.

3) Other Business Activities:

Andrew Bodner is a registered representative of Comprehensive Asset Management and Servicing, Inc. In this capacity Mr. Bodner will receive commissions on the sale of certain securities products. In addition, Mr. Bodner is a licensed insurance producer and may receive commissions on the sale of insurance products. Please refer to Item 10 of ADV Part 2A.

4) Additional Compensation:

Mr. Bodner does not receive additional compensation from non-clients for providing advisory services.

5) Supervision:

Double Diamond generally requires that all investment advisors have acquired, at a minimum, a college degree with a major in finance or accounting, and a designation relative to investments such as a Certified Financial Planner (CFP) and Chartered Financial Analyst (CFA).

Andrew Bodner is responsible for the supervision of Double Diamond's investment advisory representatives (IARs). Mr. Bodner's supervision includes a review of correspondence, (e.g., email, letters), advertising, client accounts statements and such other documentation to ensure that Double Diamond's IARs are conducting themselves in accordance with its compliance and supervisory procedures and applicable investment advisory rules and regulations.

6) Requirements for State-Registered Advisers

Double Diamond is required to disclose the material facts regarding Andy Bodner's involvement in certain civil, self-regulatory organization or administrative proceedings, arbitration awards or findings, or bankruptcy proceedings. Double Diamond has no information to disclose in relation to this Item.

The CERTIFIED FINANCIAL PLANNER(tm),

CFP(r) and federally registered CFP (with flame design) marks (collectively, the "CFP(r) marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board"). The CFP(r) certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP(r) 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 62,000 individuals have obtained CFP(r) certification in the United States.