

DOUBLE DIAMOND INVESTMENT GROUP, LLC
Wrap Fee Investment Program

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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.

Double Diamond Investment Group, LLC (IARD # 152755)

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MATERIAL CHANGES

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

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SERVICE, FEES AND COMPENSATION

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. Double Diamond has more than \$29 million dollars in assets under management on a discretionary basis primarily in its Wrap Program.

Wrap Fee Investment Program:

The wrap fee investment program (the “Program”) sponsored by Double Diamond is a fee-based account that enables a Program participant to develop an investment portfolio, consistent with the participant’s investment objective(s). Under the Program, a participant shall authorize Double Diamond to allocate his/her/their/its investment assets, on a discretionary basis, among various investments (equity, mutual fund and fixed income securities), consistent with the participant’s investment objective(s).

Under the Program, the participant shall receive both investment advisory services and the execution of brokerage transactions for a single specified fee. Participation in the Program may cost more or less than purchasing such services separately. In addition, the fees charged by Double Diamond for participation in the Program may be higher or lower than those charged by other sponsors of comparable wrap fee programs. The terms and conditions for client participation in the Program are set forth in this Brochure.

Program Advisory Fee:

Double Diamond’s Wrap Program Advisory fee schedule (“Program Advisory Fees”) for Wrap Program accounts managed by Double Diamond is based upon a percentage of assets under management (net of any debit balances) and is set forth below:

<u>Program Account Annual Fee</u>	2.00%
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Double Diamond’s Program Advisory Fees shall be prorated and paid quarterly, in advance, based upon the market value of the assets on the last business day of the previous quarter. Double Diamond’s actual fees may be negotiated, and a client may pay more or less than similar clients depending on the particular circumstances 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.

As part of Program Fee, Double Diamond pays the additional investment management fees assessed by independent third-party managers as well as any transaction fees. As a result, the client will not be charged any additional fees from the Independent Manager or for any transactional fees within this Wrap Program.

However, the client may 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). The specific charges are identified in the Prospectus or other like document that are provided separately to the

client. The clients may also incur mark-up or mark-down fees assessed by broker-dealers generally on certain fixed income transactions. Any such fees, if applicable, are identified on the transaction confirmations provided by the broker-dealer custodian.

Other Terms & Conditions:

The client will be required to enter into a formal *Program Agreement* with Double Diamond setting forth the terms and conditions under which Double Diamond shall manage the client's assets, and a separate custodial/clearing agreement with each designated broker-dealer/custodian. Both Double Diamond's *Program Agreement* and the custodial/clearing agreement authorize the custodian to debit the account for the amount of Double Diamond's Investment Advisory Fee and to directly remit that management fee to Double Diamond. The *Program 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.

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.

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.

Brokerage for Client Referrals:

Other than the relationships and affiliations previously disclosed in this *Brochure*, the *Disclosure Statement*, and/or the *Advisory Agreement*, there are no current relationships between Double Diamond, and any other parties that would present a conflict of interest to the participant.

ACCOUNT REQUIREMENTS and 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)

Double Diamond does not generally require a minimum account size for participation in the Program.

PORFOLIO MANAGER SELECTION and EVALUATION

a) Advisory/Investment Management Services:

Independent Manager Program:

Double Diamond's Wrap Program will invest client's assets on a discretionary basis amongst selected separate independent money managers in order to maximize investment returns while achieving lower volatility within pre-determined risk parameters. These separate managers will perform investment management services on a discretionary basis. Double Diamond will utilize independent money managers on a Separate Manager Platform, as well as well as outside of this platform.

Double Diamond decides which sector(s) is/are appropriate for both the client's risk tolerance and market conditions and then chooses a manager(s) which the firm decides will provide additional investment return with less risk than its relevant index or provide above average returns for managers that take less risk than the market. Double Diamond considers long term track record of the manager, and their process for achieving the desired result, as well as consistency in both up and down markets. Double Diamond will initially provide this information to the client in a detailed document. Double Diamond continues to "manage" the managers. If Double Diamond decides more money should be allocated to one particular sector, it may move money from one manager to another, change managers, or simply remove money from the platform.

b) Performance Based Fees and Side by Side Management:

Double Diamond does not charge performance fees.

c) Methods of Analysis, Investment Strategies and Risk of Loss:

Double Diamond will invest client's accounts with Independent Managers that will invest certain percentages amongst numerous asset classes (e.g. stocks, corporate and government bonds, ETFs, mutual funds and alternate investments) in order to maximize client's investment returns while achieving lower volatility within pre-determined risk parameters. Double Diamond evaluates each Independent Manager from a top-down perspective. Double Diamond will determine if we like a particular market, and if so, which sector we expect to outperform. Within the sector, Double Diamond decides which Independent Managers will outperform the general sector. Double Diamond generally limits downside risk of an Independent Manager by changing to a different manager if the investment performance is not performing up to Firm standards. Double Diamond attempts to achieve either more return with market risk, or commensurate return with less risk.

Additionally, Envestnet provides Double Diamond with initial and ongoing due diligence on all independent managers to assess their investment management and operational risks, ability to execute portfolio management in accordance with their stated investment guidelines. In the event Double Diamond determined that any independent manager is no longer appropriate for its clients, Double Diamond will seek to replace said manager with a more appropriate one for its clients.

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 markets, currency, economic, political, and business risks, and that 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.

d) Voting Client Securities:

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, Double Diamond generally will not make any filings in connection with any shareholder class action lawsuits involving securities currently or previously held in clients' accounts. Double Diamond recommends that its clients promptly review these materials, as they identify important deadlines and may require action on the client's part. Double Diamond will not be required to notify third party custodians or clients who utilize third party custodians of shareholder class action lawsuits and similar matters.

CLIENT INFORMATION PROVIDED TO PORTFOLIO MANAGERS

Double Diamond utilizes Envestnet's platform to access third party money managers. Envestnet's platform allows us to enter client-specific risk and reward information to help determine suitability. Once the client and Double Diamond have selected the appropriate Independent Money Manager, the Manager is notified via the Envestnet Platform. The client receives a document indicating the managers chosen and information about each manager, including the managers Form ADV.

CLIENT CONTACT WITH PORTFOLIO MANAGERS

All clients can contact Double Diamond in connection with any portfolio management. Independent money managers accessed through the Envestnet platform are not accessible directly by Double Diamond clients. However, the client receives a document indicating the managers chosen and information about each manager and can terminate any such Independent Manager at any time by contacting Double Diamond.

ADDITIONAL INFORMATION

a) Disclosure Information:

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

b) Other Financial Industry Affiliations:

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.

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.

c) Code of Ethics, Participation in Client Transactions and Personal Trading:

Double Diamond or 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. 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.

Double Diamond has implemented a Code of Ethics which serves to establish a standard of business conduct for all of Double Diamond's 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.

d) Review of Accounts:

Account reviews are conducted on an ongoing basis by Double Diamond's Principal, Andrew Bodner. All investment management clients are required to discuss with Double Diamond 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 Double Diamond to comprehensively review financial planning issues, including investment objectives and performance.

e) Client Referrals and Other Compensation:

Double Diamond has not entered into any Solicitor Agreements.

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.

f) **Financial Information:**

Based upon Double Diamond's business practices, use of a qualified custodian and advisory fee procedures, the SEC does not require the disclosure of financial information. Please be advised that there are no known financial conditions that would impair Double Diamond's ability to meet contractual commitments to clients.

STATE REQUIREMENTS

A-C.

See attached Brochure Supplement.

D.

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) Disciplinary Information:

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.