

WRAP FEE PROGRAM BROCHURE

Select Money Management, Inc.

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This wrap fee program brochure (this “Brochure”) provides information about the qualifications and business practices of Select Money Management, Inc. (referred to in this Brochure as “us,” “we,” “our” or the “firm”). If you have any questions about the contents of this Brochure, please contact us at (949) 975-7900. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or by any state securities authority. Additional information about us also is available on the SEC’s website at www.adviserinfo.sec.gov. We are a registered investment adviser. Registration of an adviser does not imply any level of skill or training.

ITEM 2: SUMMARY OF MATERIAL CHANGES

This summary describes all of the material changes to our old firm brochure (Form ADV, Part 2A) dated April 7, 2016. We provide this summary to our existing clients and we may omit it from the current firm brochure that we provide to new clients who did not previously receive our old firm brochure. This summary does not describe all of the changes that were made, only those that we deemed to be material, and this summary is qualified in its entirety by our current firm brochure, which is available on our affiliate web site www.selectportfolio.com or upon request by calling us at the telephone number or writing to us at the address shown on the cover page. Our current firm brochure is also available for viewing and downloading over the Internet from the Investment Adviser Public Disclosure website: www.adviserinfo.sec.gov. Follow the website's instructions to search by our firm's name, and then use the navigation bar to locate, open and, if desired, download our current firm brochure.

There have been no material changes since our last filing April 7, 2016.

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ITEM 4: SERVICES, FEES AND COMPENSATION

Our Services

We emphasize continuous personal client contact and interaction when providing discretionary portfolio management services. We base our services upon your individual financial situation, investment objectives, time horizon, and risk tolerance.

We sponsor the Select Money Management Wrap Fee Program (the “Program”), which is a fee only investment program, offered on a discretionary basis. If you participate in the Program, we will charge your account a single, specified fee, which includes the costs of investment management, brokerage, custody, and other services provided under the Program. Our program fees, minimum account requirements and additional information about our firm are described in more detail below.

Prior to engaging us to provide our services you will be required to enter into our Portfolio Management Services Agreement with us setting forth the terms and conditions under which we will provide our services. By its terms, you will grant us limited discretionary authority to manage the assets held in your account in accordance with the applicable model or custom portfolios through the purchase, sale, exchange, redemption, conversion, or other disposition of investments, income, or proceeds deposited and held in your account. We will obtain information from you about your financial situation, investment objectives and risk tolerance, by meeting with you and providing you with a questionnaire or using another method designed to obtain your relevant financial information. Based upon your individual financial situation, investment objectives, time horizon, and risk tolerance, we will recommend an initial portfolio allocation. You must contact us when a real or potential change in your financial condition occurs so we can review the portfolio along with your new information to ensure the investment strategies continue to be appropriate.

Our Fees

Although fees for the Program may be negotiated under certain circumstances, our standard fee schedule is as follows:

<u>Aggregate (or Family) Account Value</u>	<u>Annual Fee</u> Custom, Tactical Equity, Tactical Based Country or Tactical Special Opportunities Models	<u>Annual Fee</u> Tactical Growth Model	<u>Annual Fee</u> Tactical Balanced Model	<u>Annual Fee</u> Tactical Bond or Tactical Fixed Income Models	<u>Annual Fee</u> Tactical Low Duration Model
\$25,000.00 - \$150,000.00	2.40%	2.10%	2.00%	1.80%	0.25%
\$150,000.01 - \$250,000.00	2.20%	2.00%	1.90%	1.70%	0.25%
\$250,000.01 - \$500,000.00	1.90%	1.80%	1.80%	1.60%	0.25%

\$500,000.01 - \$750,000.00	1.80%	1.70%	1.70%	1.50%	0.25%
\$750,000.01 - \$1,000,000.00	1.70%	1.60%	1.40%	1.30%	0.25%
\$1,000,000.01 - \$2,000,000.00	1.30%	1.20%	1.10%	1.00%	0.25%
\$2,000,000.01 - \$3,000,000.00	1.00%	0.90%	0.90%	0.80%	0.25%
\$3,000,000.01 - \$4,000,000.00	0.90%	0.80%	0.80%	0.80%	0.25%
\$4,000,000.01 - \$5,000,000.00	0.80%	0.80%	0.80%	0.80%	0.25%
\$5,000,000.01 - and above	Negotiated	Negotiated	Negotiated	Negotiated	Negotiated

Our fees will be billed quarterly in arrears and will be automatically withdrawn from your account pursuant to your authorization. In any partial calendar quarter, our fees will be pro-rated based on the number of days your account was under our management. For the purpose of determining our fees, the market value of assets under management shall be measured on the last business day of the immediately preceding billing quarter. We will rely upon the valuations provided by the custodian without independent verification. In the event that you terminate your account prior to the end of a quarter, our final fee will be pro-rated based on the number of days your account was under our management and will either be deducted from your account in the same manner or an invoice will be sent. Unless otherwise negotiated, once your asset value exceeds the highest dollar value in the current bracket, the fee will be adjusted according to the fee schedule.

We may negotiate any of our fees, taking into consideration such things as the size of your account, the number of managed portfolios, your relationship with other clients, the length of our relationship with you, the complexity of your personal circumstances, the composition of your portfolio, the complexity of investment strategies, the frequency of desired meetings or special reporting, and other factors that affect our cost of providing services for you. If you, your family, or related persons also have accounts under our management, those accounts may be aggregated for fee calculation purposes. For these reasons, our fees may vary among clients who may be in similar circumstances.

Other investment advisors may charge higher or lower fees for comparable services. We will seek to assure that you are charged a competitive rate according to the size of the account being managed. We reserve the right to modify the fee schedule upon a minimum of thirty (30) days prior written notice to you.

Fee Comparison

Our fee includes such services as investment management, execution of securities, the custodian's monthly reports, account servicing, and continuous account management. The portfolio size and amount, number of transactions made in your account, as well as the commissions charged for each transaction, will determine the relative cost of our Program versus paying for executions on a per transaction basis and paying a separate fee for advisory services. You may be able to receive services similar to those offered through our Program from other investment advisers either separately or as part of a similar wrap fee program. These services or programs may cost more or less than our Program. Because we absorb all of the transaction costs in our Program, we have a financial incentive to infrequently trade our Program client accounts because infrequent trades will increase our net fee. To mitigate this conflict of interest in our Program, we monitor for inactive accounts and our Investment Committee manages the model portfolio performance and makes portfolio changes in our clients' best interests whenever necessary, without regard to our transaction costs.

Other Fees and Charges

If you invest in mutual funds, exchange-traded funds, and other funds or investments that are managed or administered by third-parties, you will be paying additional fees and charges to others that are in addition to our fees. For example, if you purchase mutual fund shares or a variable insurance product, then you will incur additional fees and charges at the fund level. Each mutual fund's or variable insurance product's prospectus or offering memorandum describes these fees and expenses. The additional fund-level fees may include, but are not limited to, a management fee, brokerage and custodian fees, other fund expenses, mortality and expense risk charge or possible distribution fee. If the product imposes a sales charge, you may pay an initial or deferred sales charge. Custodial fees may include wire transfer and electronic fund fees, check writing fees, custodial termination fees, and other fees and taxes on brokerage accounts and securities transactions.

Termination

You may terminate our agreement at any time by giving us five (5) days written notice; we may terminate our agreement by providing you with five (5) days written notice. Upon termination, we prorate the fee through the date of termination and charge you any remaining balance, as appropriate. You are responsible for any cost incurred in transferring your assets from our program to a different custodial account. After our agreement is terminated, we have no further duties or obligations to you under our agreement.

ITEM 5: ACCOUNT REQUIREMENTS AND TYPES OF CLIENTS

Account Requirements

The Tactically-Managed Model Portfolios offered under the Select Money Management Wrap Fee Program require a minimum of between \$25,000 and \$100,000 of investable assets depending on the model selected. See “*Investment Strategy*” section for specific requirements for each Model. We may waive the minimum requirements at our discretion.

Types of Clients

We provide portfolio management services to individuals, high net worth individuals, businesses, corporate pension and profit sharing plans, trusts, charitable institutions, foundations, and endowments.

ITEM 6: PORTFOLIO MANAGER SELECTION AND EVALUATION

Advisory Business

We are the portfolio manager for all accounts in our Program. We also act as solicitor for, and offer advice about other wrap fee programs sponsored by unaffiliated investment advisers (also known as, third-party wrap fee programs). If you select a third-party wrap fee program, you will enter into a separate written agreement setting forth the terms and conditions of your engagement with them, describing the scope of services and related fees.

For additional information regarding the third-party wrap fee programs we make available, contact your investment advisory representative or our office at (949) 975-7900 to receive a copy of our brochure (Form ADV Part 2A), as well as the disclosure brochures for any of the third-party wrap fee programs we make available.

Our affiliate, Select Portfolio Management, Inc., makes available financial planning services including, but not limited to, investment planning, retirement planning, estate planning, charitable planning, education planning, business planning, and asset protection planning. If you would like our affiliate to provide you with financial planning services, you will enter into a separate written agreement with them setting forth the terms and conditions of your engagement, describing the scope of their services to be provided, and their fee. All of our investment advisory representatives are also investment advisory representatives of Select Portfolio Management, Inc.

For financial planning and other services, you may also request a copy of Select Portfolio Management, Inc.’s brochure (Form ADV Part 2A), by calling the number above or contacting your investment advisory representative.

Performance-Based Fees and Side-By-Side Management

We do not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of your assets).

Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis

When advising you about your investments or managing your account, we typically use several methods to analyze the securities that we may select for your investment portfolio, including fundamental and technical analysis. We also consider cyclical factors affecting some industries and companies more than others. We also consider factors such as the strength of the company's or mutual fund's management team.

Fundamental analysis is a technique that attempts to determine a security's value by focusing on the economic well-being of a company, as opposed to movements of its market price. In the course of our analysis, we will review a company's financial statements and consider factors including, but not limited to, the company's historical financial condition, prior operating results and trends, its projected revenue growth, its competitive advantages and disadvantages, the anticipated demand for its current and future products or services, the age and nature of its assets, and other factors affecting the company's anticipated results from future operations. Past performance does not assure similar future performance. A company's fundamental value can be adversely affected by many factors unrelated to its actual operating performance.

Technical analysis is another method to evaluate potential investments. Unlike fundamental analysis, technical analysis does not analyze the company's value, but instead analyzes the movement of stock prices in the market, both individually and within an industry or sector of the economy. Technical analysis studies the supply and demand in the market in an attempt to determine historical and future trends. Notwithstanding favorable market price movements, a company's financial condition and other unique factors can adversely affect its value. Technical analysis relies upon stock movements and volume reflected in historical stock charts, often compared with various market benchmarks.

Cyclical factors are relevant to some industries and some company's stocks more than others. A cyclical industry or stock is generally more sensitive to our economy's business cycle. Business cycles are the recurring and fluctuating levels of economic activity that our economy experiences over a period of several years. The five stages of the business cycle are growth (expansion), peak, recession (contraction), trough and recovery. Business cycles vary in frequency, magnitude and duration. The revenue for cyclical industries and stocks are generally higher in periods of economic prosperity and expansion and lower in periods of economic downturn and contraction. Some industries and stocks tend to be counter-cyclical. The revenue for countercyclical industries and stocks tend to be negatively correlated to the overall state of the economy. A counter-cyclical stock's price will tend to move in a direction that is opposite to the general economic trend.

We obtain information from a number of sources, both public and by purchase, including financial newspapers and magazines, inspection of corporate activities, research materials prepared by third-parties, corporate rating services, annual reports, prospectuses, reports filed with the SEC, and company press releases. We believe these resources are reliable and we regularly depend on these resources for making our investment decisions.

Investment Strategies

We use a variety of investment strategies depending on your circumstances, financial objectives and needs. We may recommend implementing one or more of the following investment strategies: long-term purchases (held at least a year), short term purchases (held less than a year), trading (held less than 30 days), margin transactions (purchase of a security on credit extended by a securities company), and option writing (selling an option) or a combination of these strategies to help you meet your investment objectives.

We may recommend implementing these strategies using stocks, bonds, mutual funds (held directly or held within variable annuities or life insurance products), municipal securities, options contracts, futures contracts and other types of investments. We often recommend mutual funds of different kinds to promote portfolio diversification within various asset classes, such as industry sectors, domestic/international, or equities/bonds. We may recommend periodic purchases, sales, and exchanges of those mutual fund shares within mutual fund families and between different mutual fund families when there are changes in your needs, market conditions, or economic developments. These recommendations will be implemented through our affiliated broker-dealer Securities Equity Group.

The following is a general summary of the investment strategies used in our Select Money Management Wrap Fee Program.

Tactically-Managed Model Portfolios

At the core of our investment methodology is a rigorous due diligence process that relies on the expertise of a team of investment professionals with well over 100 years of collective experience evaluating managers, designing investment solutions, and overseeing portfolios. Our team's efforts are augmented by custody services and research capabilities of National Financial Services, LLC (NFS) - A Fidelity Investments Company, which provides detailed analysis regarding thousands of investments.

5 Equity Based Model Portfolios:

Tactical Equity Model (TE) \$100K Minimum

The Tactical Equity Model Portfolio is a growth portfolio focusing on individual stocks that have historically consistent payment of dividends as well as growth. The model uses both fundamental and technical analysis to determine the stocks held in the portfolio. Approximately 1/2 of the portfolio is allocated into "core" (consistent dividend paying companies) and approximately 1/2 in "satellite" (growth oriented companies).

Tactical Balanced Model (TBL) \$25K Minimum

The Tactical Balanced Model Portfolio is designed for moderate investors seeking a balance of equity and fixed income. The Balanced Model Portfolio seeks exposure to equity & fixed income managers and may contain Mutual Funds, UITs, I & D Shares or ETFs. We evaluate 7 broad based asset classes weekly to determine the highest ranking to overweight based on model computations.

Changes in asset weightings can change within the equity asset classes and fixed income asset classes as well as increase or decrease weighting from equity to fixed income.

Tactical Growth Model (TG) \$25K Minimum

The Tactical Growth Model Portfolio is a sector based model analyzing up to 40 market sectors weekly. We allocate in the top 8 to 10 sector groups based on model computations. It is our objective within the group of sectors we track to isolate those that show the best potential upside, even in down markets. The Tactical Growth Portfolio seeks capital appreciation through sector and broad based Mutual Funds, I & D Shares or ETFs.

Tactical Based Country Model (TBC) \$100K Minimum

The Tactical Based Country Portfolio seeks out opportunities within various countries by spanning the globe and identifying the strongest country ETF's based on our model rankings. The model groups up to 5 of the highest ranked countries together for diversification. By utilizing ETF's, the model can easily change amongst these various specific countries within our inventory. The Tactical aspects assures that the positions are being closely monitored and actively managed throughout the year. Investors allocating funds to this model, should be able to withstand greater volatility, while seeking higher growth potential.

Tactical Special Opportunities ETF Model (TSO) \$100K Minimum

The Tactical Special Opportunities ETF Model Portfolio is designed to seek out unique opportunities within the market and gain exposure to specialty segments that may otherwise be overlooked. This model uses mathematical computations to identify these opportunities that are considered to be thinking out of the box. We typically hold 5 positions on average, utilizing exchange traded funds (ETFs) as the funding vehicle. Investors allocating funds to this model should be able to withstand greater volatility, while seeking higher growth potential.

3 Fixed Income Based Model Portfolios:

Tactical Fixed Income Model (TFI) \$25K Minimum

The Tactical Fixed Income Model Portfolio is a yield focus model, deriving its yield from multiple asset classes within the fixed income space. The Tactical Fixed Income Model focuses more on yield than principal stability. This model portfolio is well suited for those seeking income and can withstand fluctuating price levels. The Tactical Fixed Income Model Portfolio seeks exposure to fixed income managers and may contain Mutual Funds, UITs, I & D Shares or ETFs.

Tactical Bond Model (TB) \$25K Minimum

The Tactical Bond Model Portfolio uses a ladder allocation of individual bonds with a reasonably consistent yield and short term maturities. This model portfolio seeks to achieve this yield with low volatility and is designed for investors to hold to maturity. In most model positions maturity will be within 1-3 years. The Tactical Bond Model Portfolio seeks exposure to fixed income managers and may contain Mutual Funds, UITs, I & D Shares or ETFs.

Tactical Low Duration Model (TLD)

The Tactical Low Duration Model Portfolio is designed to generate short-term low risk returns.

Custom Strategies are also available for specific client needs. Please ask your Advisor for information on currently offered Custom Strategies and related fees & minimums for Custom Strategies.

Investment Risks and Rewards

Investing in securities involves risk of loss that you should be prepared to bear. Securities, mutual funds, variable products, annuities and other types of investments all bear different types and levels of risk. Upon request, we can discuss the types of investments and investment strategies that we believe may tend to reduce these risks in light of your personal circumstances and financial objectives.

For our Select Money Management Wrap Fee Program, we use a proprietary methodology to determine when to buy/sell mutual funds or other securities for our separately managed accounts. No assurance can be given that any fee-based portfolio management service will result in profitable investments for you or that you will not incur losses. The results of any fee-based portfolio management service cannot be guaranteed and do not take into consideration the timing of your purchase of any particular security, how long you have held the security, your other investments, or the specific tax consequences of the sale or purchase of any securities. All risk of gain or loss in the investments and all expenses of the account(s) are your sole responsibility.

We provide no guarantee regarding the timing of a trade or exchange. While we attempt to execute trades within twenty-four (24) hours of a signal or decision, delays could occur. Processing time delays incurred by the brokerage firms, clearing firms and custodians are not our responsibility and in such event we assume no responsibility for any possible losses. In the event that a trade or exchange is missed with material losses resulting, we assume no responsibility for such losses. You will be required to waive any claim to specific, direct or consequential damages and agree that your sole remedy shall be either (1) the refund of the quarterly fee and cancellation of the Agreement or (2) the account(s) will be managed without charge for a term to be determined by us.

While we design investment strategies to provide appropriate investment diversification, some investments have significantly greater risk than others. Obtaining higher rates of return on investments entails accepting higher levels of risk. Our investment strategies seek to balance risks and rewards to achieve investment objectives. Ask questions about investment risks you do not understand. Our representatives will be able to discuss them with you.

We strive to render our best judgment on behalf of our clients. However, we cannot assure you that investments will be profitable or assure that no losses will occur in an investment portfolio. Past performance is an important consideration with respect to any investment or investment advisor but is not a reliable predictor of future performance. We continuously strive to provide outstanding long-term investment performance, but many economic market variables beyond our control can affect the performance of an investment portfolio.

Generally, some of the more common investment-related risks that may affect your investment portfolio include:

- Business risks are associated with a particular company or industry. For example, start-up companies carry greater business risks than established companies. Companies developing new technologies carry greater business risks than manufacturers of well-established or widely used products and services.
- Financial risks are often associated with the ability of a company to raise capital or finance its operations, as well as its ability to repay indebtedness. Highly leveraged companies face greater financial risks than well-capitalized companies do.
- Market risks are related to the effects of economic, political, natural disasters, or other events on the price of a publicly-traded stock, bond, exchange-traded fund, or other securities. This type of risk is typically affected by extrinsic factors that often are not related to a particular company's financial condition, performance, or circumstances. For example, investment speculation can materially affect market prices.
- Liquidity risks are associated with an investor's ability to readily convert a security or other asset into cash. Generally, there is greater liquidity for securities that are publicly traded on stock exchanges or trading facilities that match buy and sell orders. Privately offered securities may be highly illiquid because there is little or no trading or market activity.
- Concentration risks result from a lack of investment diversification, which may be expressed in terms of geography, industry, or economic sector. Mutual funds typically invest in a large number of different companies, typically lowering the risk that occurs when the investment consists of only one or a smaller number of companies.
- Options are complex, derivative securities that involve special risks. Option contracts expire at a stated maturity date and have no further value. Unlike traditional securities, the value of an option and the return from holding an option varies with the value of the underlying security from which it derives and other factors.
- Interest-rate risks are associated with changes to investment prices due to increasing or decreasing interest rates. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline. Generally, the principal value of the bond is received upon the particular bond's maturity, even though you may have purchased it at a premium or a discount from its face value. The impact of interest rate changes is different for bonds held inside

of a mutual fund or pooled investment where a particular bond is not held until its maturity.

- Inflationary and deflationary risks are associated with the purchasing power of the dollar, which is affected by broad economic, monetary, governmental policies, and the balance of supply and demand for products and services.
- Reinvestment risks are typically related to fluctuations in the potential interest rate at which future investment proceeds may have to be invested. For example, reinvestment risks may increase during periods of falling interest rates. This risk primarily relates to bonds and other fixed income securities.
- Currency risks are primarily associated with foreign investments. For example, a company's earnings in a foreign country may be affected by fluctuations in the value of the dollar against that foreign currency. Similarly, the investment return of a foreign security may be affected by changes in currency exchange rates.
- The use of portfolio models is a cost-effective way to manage a large number of accounts; however, when models are used, the trading that occurs typically does not take into consideration the specific circumstances of an investor such as the investment horizon, holding period, and tax considerations.

Types of Investments

We provide investment advice with respect to a wide range of investments, including no-load mutual funds, indexed funds, exchange traded funds (generically referred to as “*funds*”), unit investment trusts, stocks, bonds, annuities and other types of investment securities. Advice may also be given to clients with interests in partnerships investing in other business activities such as real estate investment trusts (REITs), and various types of insurance products that may include investment features.

We often offer advice about separately managed accounts by unaffiliated investment advisors, mutual funds, exchange-traded funds, and variable annuities. Our representatives will answer any questions you may have about these kinds of investments and investment programs.

Mutual Funds offer several “classes” of their shares which may be purchased by different types of investors or investors with different investment objectives. These are also described in the mutual funds’ prospectuses. Depending on your investable assets, investment objectives, and time horizon, different classes may be more appropriate. We will be able to discuss the available classes of mutual fund shares that may be available, the different purposes for which they may be purchased, and the differences in commissions and charges that are associated with each share class.

Variable Annuities are highly complex financial products offered by insurance companies. Investments in a variable annuity contract are subject to both general market risk and the insurance company’s credit risk. These and other risks are described in the variable annuities’ prospectuses.

Variable annuities are regulated under both securities and insurance laws and related rules and regulations. Variable annuities offer various benefits and features which may or may not have value to you depending on your circumstances. Like other types of investments, commissions are paid for the purchase of variable annuities and there may be substantial surrender charges. Commission, surrender charges, and other expenses are disclosed in the fund's prospectus.

Voting Client Securities

As a matter of firm policy and practice, we will not be responsible for responding to proxies that are solicited with respect to annual or special meetings of shareholders of securities held in your account. Proxy solicitation materials will be forwarded to you by your custodian for response and voting. If you have any questions about a particular proxy voting matter, please do not hesitate to ask.

ITEM 7: CLIENT INFORMATION PROVIDED TO PORTFOLIO MANAGERS

As the portfolio manager, our investment adviser representatives have access to all of the information you provide to us, including financial information. Our firm has adopted a Privacy Policy which restricts our firm and our investment adviser representatives' use of and access to your nonpublic personal information. In order for us and our investment adviser representatives to effectively manage your account and assist in meeting your financial objectives, we ask you to update us as soon as possible when any changes to personal or financial information occur. A complete copy of our Privacy Policy is attached at the end of this Brochure.

ITEM 8: CLIENT CONTACT WITH PORTFOLIO MANAGERS

You may contact or consult with us regarding the Program or your account by calling (949) 975-7900 during business hours. We are open Monday through Friday from 8:30 a.m. to 5:00 p.m.

ITEM 9: ADDITIONAL INFORMATION

Disciplinary Information

As a registered investment adviser, we are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of our firm or the integrity of our management. We have no legal or disciplinary events to disclose.

Other Financial Industry Activities and Affiliations

We are affiliated by common ownership with Select Portfolio Management, Inc., another investment advisor registered with the SEC. We may refer you to Select Portfolio Management, Inc. for its advisory services. Its services, fees, and additional important information are disclosed in its own firm brochure, which you will receive before engaging in its advisory services. Tony Amaradio, Daniel Amaradio, Semir Amin, Mark Goldsmith, Gary McCarver, Park Randazzo and Carin Amaradio are also investment advisor representatives of affiliate Select Portfolio Management, Inc. and may earn fees on services that they may have recommended.

We are also affiliated by common ownership with broker-dealer, Securities Equity Group, member FINRA and SIPC. Securities Equity Group acts as a fully disclosed introducing broker-dealer for National Financial Services, LLC, who holds client assets and executes transactions for client accounts. Securities Equity Group is not affiliated with National Financial Services, LLC. For more information about Securities Equity Group and its brokerage services, see the discussion under the heading *Brokerage Practices*. Daniel Amaradio, Semir Amin, Mark Goldsmith, Gary McCarver, Park Randazzo and Carin Amaradio are all registered representatives of broker-dealer Securities Equity Group and may earn commissions on securities transactions that they may have recommended. Commissions may be higher or lower at Securities Equity Group than at other broker-dealers. Our firm and our representatives receive no commission if you choose to purchase securities through a broker-dealer other than Securities Equity Group.

We are also affiliated by common ownership with SPM Insurance Services, Inc. an independent wholesale insurance agency. We may refer you to licensed agents of SPM Insurance Services, Inc. for fixed annuity and insurance products. Daniel Amaradio, Mark Goldsmith, Gary McCarver, Park Randazzo and Carin Amaradio have insurance licenses and may earn commissions on fixed insurance and annuity products that they may have recommended.

Commissions earned on insurance products are typically higher and in some instances substantial compared to commissions earned on mutual funds or other securities. Because of this, there exists a potential conflict of interest in the recommendation made by the representative that serves as an investment advisor representative, a registered representative and/or a licensed insurance agent who earns commission on the products that they may have recommended. Other than investment recommendations in our Program, you are under no obligation to implement investment and insurance recommendations through Securities Equity Group or through any insurance companies our representatives are contracted with.

Due to the relationships between the affiliated companies, potential conflicts of interest may arise with advisor recommendations. We address these potential conflicts by disclosing these relationships and the compensation we may earn when you engage in our services.

Code of Ethics

We have adopted a Code of Ethics (the “Code”) pursuant to Rule 204A-1 under the Advisers Act describing the standards of business conduct we expect all officers, directors, employees and investment advisory representatives to follow. In summary, the Code prohibits our employees from taking inappropriate advantage of their positions and the access to information concerning the investments or investment intentions of our clients, or their ability to influence such investment intentions, for personal gain or in a manner detrimental to the interests of its clients. Rule 204A-1 makes it unlawful for our employees to engage in conduct which is deceitful, fraudulent, or manipulative, or which involve false or misleading statements in connection with the purchase or sale of securities. The Code acknowledges the general principles that we, along with our employees: (1) owe a fiduciary obligation to its clients; (2) have the duty at all times to place the

interests of their clients first; (3) must conduct all personal securities transactions in such a manner as to avoid any actual or potential conflict of interest or abuse of an individual's position of trust and responsibility; (4) should not take inappropriate advantage of their positions in relation to client accounts; (5) must comply with the federal securities laws; and (6) must safeguard nonpublic information. The Code also describes certain reporting requirements with which particular individuals associated with or employed by us must comply. We will provide a copy of the Code to any client or prospective client upon request.

Participation or Interest in Client Transactions and Personal Trading

Our employees may, from time to time, buy or sell securities for their own accounts that are the same as, similar to or the opposite of those that we recommend to you for purchase or sale. Differences can arise due to variations in personal goals, investment horizons, risk tolerance and the timing of purchases and sales. Our Chief Compliance Officer or one of her designees receives and reviews the quarterly brokerage statements belonging to employees for possible conflicts of interest.

Brokerage Practices

Our brokerage practices vary depending on the type of advisory services you select. If you engage in our portfolio management services under our Program, you will direct us to place all securities transactions for your account through our affiliated broker-dealer, Securities Equity Group, and its clearing and custodial broker-dealer, National Financial Services, LLC. This recommendation is based upon, among other things, the level of service and efficiency that is available by using our affiliated broker-dealer and the administrative convenience associated with using the same individuals in their different capacities.

Select Money Management, Inc. has the following policy regarding trade errors that may occur in investment advisory accounts. The trader or other employee who discovers an error will immediately report the error to the Chief Operations Officer/Compliance Officer. Under no circumstances will an employee correct a trade error without supervisory approval. The firm will have the trade corrected and reversed out of the client account. Select Money Management, Inc. maintains an error account where trade errors are moved to and then reconciled. At year-end this account is reviewed and should there be a positive balance in the account it will be donated to charity.

Securities Equity Group does not hold any customer accounts and is not a market-maker in any security. Securities transactions in our Program will be placed through Securities Equity Group and transaction costs and related charges will be included in our advisory fees. The conflicts of interest related to directing securities transactions through Securities Equity Group are described under the heading *Code of Ethics, Participation or Interest in Client Transactions, and Personal Trading*. Transactions placed for execution by registered representatives of Securities Equity

Group through other broker-dealers would be subject to special supervision under FINRA rules and are generally avoided because of those complexities and related costs.

Custody

While we do not have physical custody of the assets held in your account, if you engage our investment management services, then we will have authority to bill your custodian for our fees and, upon billing, to receive our fees by deducting them directly from your account as described under the heading *Fees and Compensation*. This fee-deduction authority gives us the ability to obtain money from your account and so is deemed to constitute limited custody of your account assets.

You should receive monthly and/or quarterly statements from the broker-dealer, or other qualified custodian you select to hold your account assets. We urge you to carefully review your broker-dealer and/or custodian's periodic statements and to compare those records with the reports that we may periodically provide to you. Our reports are not intended to replace or supersede your custodian's periodic statements and may vary based on accounting procedures, reporting dates, or valuation methodologies.

Investment Discretion

As explained under the heading *Advisory Business*, within our Program, you have granted us limited discretionary authority over your account, which includes authority to select the identity and amount of securities to be bought or sold for your benefit and risk. Our discretion will be exercised in accordance with your stated investment objectives. You may provide us with written investment guidelines or restrictions to limit our discretionary authority or we may develop an investment policy statement or similar document with you.

Review of Accounts

Reviews and Reviewers – Reviewers include: Tony Amaradio, Daniel Amaradio, Semir Amin, Mark Goldsmith, Gary McCarver and Park Randazzo. All representatives are expected to provide review services as specified by our firm and the number of accounts assigned to each representative will vary. Many accounts are reviewed on a regular basis by more than one representative. You are contacted periodically for reviews and interim financial reviews are available upon request.

Account Reporting – Monthly and/or quarterly statements showing account value and billing information are available online or will be mailed in paper version depending on your election with the custodian. You will also receive a confirmation of each purchase and sales transaction that occurs within your account directly from the custodians that hold your investments.

Client Referrals and Compensation

As described above under the heading *Advisory Business*, we are a solicitor for, and may recommend that you engage the services of, a third-party investment advisor through a wrap fee program. If you do, we will receive a portion of the wrap fee you pay to the program sponsor/manager. Our solicitor's compensation is described in the sponsor's wrap fee brochure and in a solicitor's disclosure statement. You will not pay the program sponsor/manager any additional fees by virtue of our having made the referral and we do not charge any additional fees with respect to your assets invested through a wrap fee program. We will seek to assure that the fees charged to our clients by program sponsors/managers are competitive and consistent with fees charged to that program sponsor's/manager's other clients.

From time to time we may engage solicitors to market our services. We pay solicitors for their services, as described in a separate solicitor's brochure that you should have received, together with a copy of this firm's brochure, when the solicitor introduced you to our firm. The amount of compensation we pay solicitors is typically a share of the fees you pay us. The amount may vary by solicitor and may vary over time. Our method of computing the solicitor's compensation is described in the solicitor's brochure. Compensation paid or received in connection with these relationships creates potential conflicts of interest that you should carefully consider in evaluating and acting upon our recommendation

Financial Information

We have no financial liabilities, obligations, or commitment that impairs our ability to meet our contractual and fiduciary commitments to you. We have not been the subject of a bankruptcy proceeding.

PRIVACY POLICY - NOTICE REGARDING PRIVACY OF CUSTOMER INFORMATION

This notice is provided to you on behalf of Select Money Management, Inc., Select Portfolio Management, Inc., Securities Equity Group and SPM Insurance Services, Inc. (collectively referred to in this notice as "we", "us", "our", or "Affiliated Companies"). Protecting our customers' privacy is of paramount importance. We recognize that an individual's financial matters are private and sensitive in nature, and we have adopted policies that assist us in protecting your privacy and, at the same time, help us to provide you with a broad range of high quality financial products and services.

This Privacy Policy will explain the types of information we collect about you, how we use and share that information, and how you can instruct us to limit certain types of information sharing. Information we obtain from all customers and former customers is treated in the same manner.

How We Protect Your Information:

We protect your data and safeguard it from those not authorized to see it by adopting internal policies and procedures. Under no circumstances will we sell confidential customer information to anyone.

What Information We Collect about You:

- We collect information from you when you open an account or enroll in one of our services. The information we collect may include, but is not limited to: your name, address, phone number, email address, social security number and date of birth, as well as details about your investments and investment experience.
- Once you have opened an account with us, we collect and maintain confidential customer information about your account activity, including your transactions, balances, positions, and history. This information allows us to provide the services you have requested.
- We may collect information about you from information services and consumer reporting agencies to verify your identity, employment, or creditworthiness, or to better understand your financial needs.
- The law permits us to share information about our current and former customers with government agencies or authorized third parties under certain circumstances. For example, we may be required to share such information in response to subpoenas or to comply with certain laws.

How We Share Information About You With Affiliated Companies:

Select Money Management, Inc. (“SMM”) and Select Portfolio Management, Inc. (“SPM”) are federally regulated registered investment advisors affiliated via common ownership with Securities Equity Group (“SEG”), an independent broker-dealer, member of FINRA and SIPC, and with SPM Insurance Services, Inc., an independent wholesale insurance agency. We may share information we collect about you among our Affiliated Companies to:

- help provide you with better service or perform services on your behalf;
- respond to communications from you or as you authorize or request;
- make it more convenient for you to open a new account; and
- allow an Affiliated Company to provide you with information about their products and services that we believe may benefit or interest you.

You may instruct us not to share information about you with our Affiliated Companies for certain purposes, as explained under *How to Limit the Sharing of Information about You*.

How We Share Information About You With Non-Affiliated Companies:

We provide access to information about you to outside companies and other third parties in certain limited circumstances, including:

- to help us process transactions for your account;
- when we use another company to provide services for us, such as printing or mailing account statements; and
- when we believe that disclosure is required or permitted under law. For example, we may be required to disclose personal information to cooperate with regulatory or law enforcement authorities, to report your tax-related information to federal and state governments, to resolve consumer disputes, to perform credit/authentication checks, or for risk control.

If your SMM/SPM Investment Advisor Representative or SEG Registered Representative leaves us to join another firm, they are permitted to retain copies of your information to facilitate the transfer of your account to a new broker-dealer or investment advisor in order to serve you at their new firm. Their continuing use of your information will be subject to the new firm's privacy policy. You are not obligated to transfer your account if your Investment Advisor Representative or SEG Registered Representative leaves us, and you may instruct us **not** to allow the sharing of information as explained.

How to Limit the Sharing of Information about You:

If you prefer, you may choose to limit the information we share about you with our Affiliated and Non-Affiliated Companies. Specifically, you may instruct us:

- **not** to allow our Affiliated Companies to market their financial products or services to you;
- **not** to share confidential customer information about you with a Non-Affiliated company for joint marketing purposes; and
- **not** to allow your SMM/SPM Investment Advisor Representative or SEG Registered Representative to take your information to facilitate the transfer of your account(s) should they leave any of our Affiliated Companies.

You may exercise your choice by writing us at Select Money Management, Inc., Attn: Compliance Department, 26800 Aliso Viejo Parkway – Suite 150, Aliso Viejo, CA 92656. Your choice will be applied to you as an individual and will automatically be extended to all of your accounts with any of our Affiliated Companies. You may make your privacy choice at any time and it will remain in effect until you change it in writing.

Safeguarding Your Information, Maintaining Your Trust:

We take precautions to ensure the information we collect about you is protected and is accessed only by authorized individuals or organizations. Our employees are trained about privacy and are required to safeguard confidential customer information. We maintain physical, electronic, and procedural safeguards to protect confidential customer information.

Contact Us with Any Questions:

If you have any questions or concerns, or if you identify any information that you believe is no longer accurate, you may contact your SMM/SPM Investment Advisor Representative, SEG Registered Representative, or write to:

Select Money Management, Inc.
Attn: Compliance Department
26800 Aliso Viejo Parkway – Suite 150
Aliso Viejo, CA 92656.
1-800-445-9822