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TT Capital Management LLC

Doing Business As

T&T Capital Management

WWW.TTVALUEINVESTING.COM
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August 3, 2026

FORM ADV PART 2A
BROCHURE

This brochure provides information about the qualifications and business practices of T&T Capital Management. If you have any questions about the contents of this brochure, contact us at 805-886-8140. 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 T&T Capital Management (CRD # 158407) is available on the SEC's website at www.adviserinfo.sec.gov.

T&T Capital Management is a registered investment adviser. Registration with the SEC or any state securities authority does not imply a certain level of skill or training.

Item 2 Material Changes

Form ADV Part 2 requires registered investment advisers to amend their firm brochure when information becomes materially inaccurate. If there are any material changes to an adviser's firm brochure, the adviser is required to notify you and provide you with a description of the material changes.

Since our last annual updating amendment dated February 12, 2026, we do not have any material changes to report.

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Item 4 Advisory Business

A. Firm Information

TT Capital Management LLC doing business as T&T Capital Management ("T&T," "T&T Capital Management," or the "Advisor"), a limited liability company organized under the laws of the State of Arizona, is a registered investment adviser with its primary office located in Gilbert, AZ. T&T Capital Management was founded and registered as an investment adviser in 2011 and is owned and operated by Timothy Philip Travis. The firm's CRD Number is 158407. Mr. Travis serves as the firm's Chief Investment Officer & Chief Executive Officer. This firm brochure provides information regarding the qualifications, business practices, and the advisory services provided by T&T Capital Management.

B. Advisory Services Offered

T&T Capital Management offers investment advisory services to individuals, high net worth individuals and corporations.

Account Portfolio Management
T&T Capital Management provides customized investment advisory solutions for its Client. This is achieved through ongoing personal Client contract and interaction while providing discretionary investment management and consulting services. Please see Item 16 below, *Investment Discretion* for more information. T&T works with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to create a portfolio allocation. T&T will then construct a portfolio, consisting of stocks, bonds, option contracts, and any other instrument deemed appropriate in view of the Client's investment profile. In some cases, T&T may open a short position in a security with potential to lose value.

T&T's investment strategy is primarily long-term, deep value, focused; however T&T may buy, sell or re-allocate positions that have been held less than one year to meet objectives of the Client or due to market conditions. T&T will construct, implement, and monitor the portfolio to ensure it meets the goals, objectives, circumstances, and risk tolerance agreed to by the Client. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to the acceptance by the Advisor.

T&T evaluates and selects securities for inclusion in Client portfolios only after applying its internal due diligence process. T&T may recommend, on occasion, redistributing investment allocations to diversify the portfolio. T&T may recommend specific positions to increase sector or asset class weightings. The Advisor may recommend employing cash positions as a possible hedge against market movement, which may adversely affect the portfolio. T&T may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, over valuation or overweighting of the position in the portfolio, change in risk tolerance of Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client's risk tolerance.

Rollover Recommendations
Effective December 20, 2021 (or such later date as the US Department of Labor ("DOL") Field Assistance Bulletin 2018-02 ceases to be in effect), for purposes of complying with the DOL's Prohibited Transaction Exemption 2020-02 ("PTE 2020-02") where applicable, we are providing the following acknowledgment to you. When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable,

which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. Under this special rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

We benefit financially from the rollover of your assets from a retirement account to an account that we manage or provide investment advice, because the assets increase our assets under management and, in turn, our advisory fees. As a fiduciary, we only recommend a rollover when we believe it is in your best interest.

Sub-Advisory Services to Registered Investment Advisers
We offer sub-advisory services to unaffiliated registered investment advisers (the "Primary Investment Adviser"). As part of these services, we will manage assets delegated to our firm by the Primary Investment Adviser.

Prior to rendering investment advisory services, T&T will ascertain, in conjunction with the Client, the Client's financial situation, risk tolerance and investment objectives.

C. Client Account Management

Prior to engaging T&T to provide investment advisory services, each Client is required to enter into an Investment Advisory Agreement with the Advisor that defines the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

- Establishing an Investment Policy Statement - T&T, in connection with the Client, may develop a statement that summarizes the Client's investment goals and objectives along with the broad strategy[ies] to be employed to meet the objectives. An Investment Policy Statement generally includes specific information on the Client's stated goals, time horizon for achieving the goals, investment strategies, Client risk tolerance and any restrictions imposed by the Client.
- Portfolio Construction - T&T will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision - T&T will provide investment management and ongoing oversight of the Client's portfolio and overall account.

D. Wrap Fee Programs

T&T does not manage or place Client assets into a wrap fee program. Investment management services are provided directly by T&T.

E. Assets Under Management

As of January 21, 2026, the most recent date for which such calculations are provided pursuant to securities regulations, T&T manages the following assets:

Assets Under Management	Assets
Discretionary Assets	$189,834,639
Non-Discretionary Assets	$0
Total	$189,834,639

Clients may request more current information at any time by contacting the Advisor.

Item 5 Fees and Compensation

The following paragraphs detail the fee structure and compensation methodology for investment management. Each Client shall sign an Investment Advisory Agreement that details the responsibilities of T&T and the Client. In limited circumstances and in our sole discretion, we may negotiate our advisory fee depending on individual client circumstances.

A. Fees for Advisory Services

Account Portfolio Management

Investment Advisory Fees are paid quarterly in advance pursuant to the terms of the Investment Advisory Agreement. Investment Advisory Fees are based on the market value of assets under management at the end of each quarter. Investment Advisory Fees range from 1.50%-2.00% based on the following schedule. Lower fees for comparable services may be available from other sources.

Assets Under Management	Annual Rate
$10,000 to $500,000	2.00%
$500,001 to $1,000,000	1.75%
Over $1,000,000	1.50%

Investment Advisory Fees in the first quarter of service are prorated to the inception date of the account to the end of the first quarter. Fees may be negotiable at the discretion of the Advisor. The Client's fees will take into consideration the aggregate assets under management with Advisor. All securities held in accounts managed by T&T will be independently valued by the designated Custodian. T&T will not have the authority or responsibility to value portfolio securities.

In certain circumstances, advisory fees and account minimums may be negotiable based upon prior relationships as well as related account holdings. The fees charged are calculated as described above and are not charged on the basis of a share of capital gains or capital appreciation of the funds or any portion of the funds of an advisory client.

The Client may be able to attain similar services for a lower fee from other service providers.

B. Fee Billing

Account Portfolio Management

We will deduct our fee directly from your account through the qualified custodian holding your funds and securities. We will deduct our advisory fee only when you have given our firm written authorization permitting the fees to be paid directly from your account. Further, the qualified custodian will deliver an account statement to you at least quarterly. These account statements will show all disbursements from your account. You should review all statements for accuracy.

C. Other Fees and Expenses

Clients may incur certain fees or charges imposed by third parties, other than T&T, in connection with investments made on behalf of the Client's account[s]. The Client is responsible for all custodial and securities execution fees charged by the custodian and executing broker-dealer. The Investment Advisory Fee charged by T&T is separate and distinct from these custodian and execution fees.

In addition, all fees paid to T&T for investment advisory services are separate and distinct from the expenses charged by mutual funds and exchange-traded funds to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client could invest in these products directly, without the services of T&T, but would not receive the services provided by T&T which are designed, among other things, to assist the Client in determining which products or services are most appropriate to each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by T&T to fully understand the total fees to be paid. For information on our brokerage practices, please refer to *Item 12 - Brokerage Practices* of this firm brochure.

D. Advance Payment of Fees and Termination

Account Portfolio Management

T&T is compensated for its services in advance of the quarter in which investment advisory services are rendered. Clients may request to terminate their Investment Advisory Agreement with T&T, in whole or in part, by providing advance written notice. The Client shall be responsible for Investment Advisory Fees up to and including the effective date of termination. Upon termination, the Advisor will refund any unearned, prepaid Investment Advisory Fees from the effective date of termination to the end of the quarter. The Client's Investment Advisory Agreement with the Advisor is non-transferable without Client's written approval.

E. Compensation for Sales of Securities or Other Investment Products

Persons providing investment advice on behalf of our firm are licensed as independent insurance agents. These persons will earn commission-based compensation for selling insurance products, including insurance products they sell to you. Insurance commissions earned by these persons are separate and in addition to our advisory fees. This practice presents a conflict of interest because persons providing investment advice on behalf of our firm who are insurance agents have an incentive to recommend insurance products to you for the purpose of generating commissions rather than solely based on your needs. You are under no obligation, contractually or otherwise, to purchase insurance products through any person affiliated with our firm.

F. Fees for Sub-Advisory Services

Fees and payment arrangements for sub-advisory services are negotiable and will vary on a case-by-case basis. Specific fees and payment arrangements will be specified in a sub-advisory agreement signed between T&T and the Primary Investment Adviser.

Item 6 Performance-Based Fees and Side-By-Side Management

We do not accept performance-based fees or participate in side-by-side management. Performance-based fees are fees that are based on a share of a capital gains or capital appreciation of a client's account. Side-by-side management refers to the practice of managing accounts that are charged performance-based fees while at the same time managing accounts that are not charged performance-based fees. Our fees are calculated as described in the *Fees and Compensation* section above, and are not charged on the basis of a share of capital gains upon, or capital appreciation of, the funds in your advisory account.

Item 7 Types of Clients

T&T provides investment advisory services to the following types of Clients:

- Individuals, high net worth individuals and corporations.

The relative percentage each type of Client is available on T&T's Form ADV Part 1. These percentages will change over time. T&T generally does not impose a minimum account size for establishing a relationship.

Separate account management generally requires a minimum of $10,000 assets under management; however, under certain circumstances this may be negotiable.

We also provide sub-advisory services to unaffiliated, independent registered investment advisers.

Item 8 Methods of Analysis, Investment Strategies and Risk of Loss

A. Methods of Analysis

T&T primarily employs fundamental analysis methods in developing investment strategies for its Clients. Research and analysis from T&T is derived from numerous sources, including financial media companies, third-party research materials, Internet sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others.

T&T generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. T&T will typically hold all or a portion of a security for more than a year, but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, T&T may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector or asset class. We may use one or more of the following methods of analysis or investment strategies when providing investment advice to you:

Fundamental Analysis - involves analyzing individual companies and their industry groups, such as a company's financial statements, details regarding the company's product line, the experience and expertise of the company's management, and the outlook for the company and its industry. The resulting data is used to measure the true value of the company's stock compared to the current market value.

> *Risk*: The risk of fundamental analysis is that information obtained may be incorrect and the analysis may not provide an accurate estimate of earnings, which may be the basis for a stock's value. If securities prices adjust rapidly to new information, utilizing fundamental analysis may not result in favorable performance.

Technical Analysis - involves studying past price patterns, trends and interrelationships in the financial markets to assess risk-adjusted performance and predict the direction of both the overall market and specific securities.

> *Risk*: The risk of market timing based on technical analysis is that our analysis may not accurately detect anomalies or predict future price movements. Current prices of securities may reflect all information known about the security and day-to-day changes in market prices of securities may follow random patterns and may not be predictable with any reliable degree of accuracy.

Charting Analysis - involves the gathering and processing of price and volume pattern information for a particular security, sector, broad index or commodity. This price and volume pattern information is analyzed. The resulting pattern and correlation data is used to detect departures from expected performance and diversification and predict future price movements and trends.

> *Risk*: Our charting analysis may not accurately detect anomalies or predict future price movements. Current prices of securities may reflect all information known about the security and day-to-day changes in market prices of securities may follow random patterns and may not be predictable with any reliable degree of accuracy.

Cyclical Analysis - a type of technical analysis that involves evaluating recurring price patterns and trends. Economic/business cycles may not be predictable and may have many fluctuations between long-term expansions and contractions.

> *Risk*: The lengths of economic cycles may be difficult to predict with accuracy and therefore the risk of cyclical analysis is the difficulty in predicting economic trends and consequently the changing value of securities that would be affected by these changing trends.

Long-Term Purchases - securities purchased with the expectation that the value of those securities will grow over a relatively long period of time, generally greater than one year.

> *Risk*: Using a long-term purchase strategy generally assumes the financial markets will go up in the long-term which may not be the case. There is also the risk that the segment of the market that you are invested in or perhaps just your particular investment will go down over time even if the overall financial markets advance. Purchasing investments long-term may create an opportunity cost - "locking-up" assets that may be better utilized in the short-term in other investments.

Short-Term Purchases - securities purchased with the expectation that they will be sold within a relatively short period of time, generally less than one year, to take advantage of the securities' short-term price fluctuations.

> *Risk*: Using a short-term purchase strategy generally assumes that we can predict how financial markets will perform in the short-term which may be very difficult and will incur a disproportionately higher amount of transaction costs compared to long-term trading. There are many factors that can affect financial market performance in the short-term (such as short-term interest rate changes, cyclical earnings announcements, etc.) but may have a smaller impact over longer periods of times.

Trading - We may use frequent trading (in general, selling securities within 30 days of purchasing the same securities) as an investment strategy when managing your account(s). Frequent trading is not a fundamental part of our overall investment strategy, but we may use this strategy occasionally when

we determine that it is suitable given your stated investment objectives and tolerance for risk. This may include buying and selling securities frequently in an effort to capture significant market gains and avoid significant losses.

> *Risk*: When a frequent trading policy is in effect, there is a risk that investment performance within your account may be negatively affected, particularly through increased brokerage and other transactional costs and taxes.

B. Risk of Loss

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. T&T will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

Fundamental analysis utilizes economic and business indicators as investment selection criteria. These criteria are generally ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included in *Item 13 - Review of Accounts*.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process.

T&T may use margin in Client accounts to manage the timing of purchases and sales, as appropriate. T&T may employ options strategies to hedge or gain additional exposure to a particular asset class or sector. T&T's investment strategy encompasses active trading in concentrated portfolios. Following are some of the risks associated with Margin, Options and Short-Sale transactions:

Margin Transactions - a securities transaction in which an investor borrows money to purchase a security, in which case the security serves as collateral on the loan.

> *Risk*: If the value of the shares drops sufficiently, the investor will be required to either deposit more cash into the account or sell a portion of the stock in order to maintain the margin requirements of the account. This is known as a "margin call." An investor's overall risk includes the amount of money invested plus the amount that was loaned to them.

Option Writing - a securities transaction that involves selling an option. An option is a contract that gives the buyer the right, but not the obligation, to buy or sell a particular security at a specified price on or before the expiration date of the option. When an investor sells an option, he or she must deliver to the buyer a specified number of shares if the buyer exercises the option. The option writer/seller receives a premium (the market price of the option at a particular time) in exchange for writing the option.

> *Risk*: Options are complex investments and can be very risky, especially if the investor does not own the underlying stock. In certain situations, an investor's risk can be unlimited.

Short Sales - Unlike a straightforward investment in stocks where you buy shares with the expectation that their price will increase so you can sell at a profit, in a "short sale" you borrow stocks from your brokerage firm and sell them immediately, hoping to buy them later at a lower price. Thus, a short seller hopes that the price of a stock will go down in the near future. A short seller thus uses declines in the market to his advantage. The short seller makes money when the stock prices fall and loses when prices go up. The SEC has strict regulations in place regarding short selling.

> *Risk*: Short selling is very risky. A short seller will profit if the stock goes down in price, but if the price of the shares increase, the potential losses are unlimited. There is no ceiling on how much a short seller can lose in a trade. The share price may keep going up and the short seller will have to pay whatever the prevailing stock price is to buy back the shares. However, gains have a ceiling level because the stock price cannot fall below zero. A short seller has to undertake to pay the earnings on the borrowed securities as long as the short seller chooses to keep the short position open. If the company declares huge dividends or issues bonus shares, the short seller will have to pay that amount to the lender. Any such occurrence can skew the entire short investment and make it unprofitable. The broker can use the funds in the short seller's margin account to buy back the loaned shares or issue a "call away" to get the short seller to return the borrowed securities. If the broker makes this call when the stock price is much higher than the price at the time of the short sale, then the investor can end up taking huge losses.

Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with our firm. For more information on our investment management services, please contact us at 805-886-8140.

Item 9 Disciplinary Information

We are required to disclose the facts of any legal or disciplinary events that are material to a client's evaluation of our advisory business or the integrity of our management.

On May 16, 2023, the Commonwealth of Pennsylvania Department of Banking and Securities, Bureau of Securities Compliance Examinations entered a Consent Order finding that T&T Capital Management ("TTCM") operated in violation of the Pennsylvania Securities Act of 1972, 70 P.S. 1-101 et seq. ("1972 Act"). From in or about March 2022 until February 2023, T&T Capital Management transacted business in Pennsylvania as an investment advisor while neither registered nor exempt from registration. T&T Capital Management employed at least one unregistered investment advisor in violation of Section 301(c) of the 1972 Act, 70 P.S. 1-301(c). TTCM agreed to comply with the 1972 Act, and Regulations adopted by the Department, and in particular Section 301(c) of the 1972 Act, 70 P.S. 1-301(c) and pay an administrative assessment in the amount of $30,000. On April 26, 2023, two investment adviser representatives of TTCM were approved as investment advisors in the state of Pennsylvania.

Item 10 Other Financial Industry Activities and Affiliations

Mr. Timothy Travis is also the owner of a separate subscription-based investment research publication, Values Options Letter ("VOL"), which charges a monthly subscription fee.

This publication provides general market commentary and trade ideas to subscribers on an impersonal basis and does not provide individualized investment advice. The publication operates in reliance on the publisher's exemption under the Investment Advisers Act of 1940 and is not registered as an investment adviser.

While clients of T&T may also subscribe to VOL, we do not require or encourage such subscriptions, and no advisory relationship is created through the publication. Because all content is provided simultaneously to all subscribers and is not tailored to any individual, T&T Capital Management does not believe this activity creates a material conflict of interest with its advisory clients.

Licensed Independent Insurance Agents
Our firm only provides investment advice. However, persons providing investment advice on behalf of our firm, in their separate capacity as an outside business activity, may be licensed as independent insurance agents. These persons will earn commission-based compensation for selling insurance products, including insurance products they sell to you. Insurance commissions earned by these persons are separate and in addition to our advisory fees. Please refer to *Item 5 - Fees and Compensation* in this firm brochure for more information on the compensation received by insurance agents who are affiliated with our firm and any resulting conflicts of interest presented by this arrangement. Associated persons of our firm who are licensed as independent insurance agents must ensure that their activities as an independent insurance agent at all times comply with the rules and regulations of the organizations and/or regulatory authorities issuing his insurance license and our Code of Ethics. Notwithstanding the foregoing, associated persons who are licensed as independent insurance agents shall refrain from recommending and/or selling insurance products to our advisory clients for which they may receive a sales commission. Insurance products will not be offered to clients unless associated person(s) is appropriately licensed to sell insurance products in the applicable jurisdiction. You are free to purchase insurance products from other agents not affiliated with us.

Please refer to *Item 11 - Code of Ethics, Participation or Interest in Client Transactions, and Personal Trading* of this firm brochure for more information regarding our Code of Ethics.

Other Business Activities
Joel Kelner is an investment adviser representative of T&T and an owner and principal of Vatreni, a mortgage company. In Mr. Kelner's capacity as the owner of a mortgage company, this may present a conflict of interest because he may have an incentive to recommend services of the mortgage company to you for purposes of earning fees. In efforts to mitigate any conflicts of interest, it is our firm's policy to prohibit Mr. Kelner and any other investment advisor representative from our our firm from recommending any mortgage-related products through Vatreni. Our firm and and investment advisor representatives must act in our client's best interests. Clients are under no obligation to purchase mortgage-related products/services through any person affiliated with our firm.

Scott Altenburg is a Vice president of Three Lakes Advisors, Inc., a commodities brokerage firm. Mr. Altenburg maintains his commodity trading license with Three Lakes Advisors, Inc. In his separate capacity as a vice president of Three Lakes Advisors, Inc., he may receive compensation in connection with commodities or futures related products. Compensation Mr. Altenburg earns with Three Lakes Advisors, Inc. is separate from our advisory fees and we do not benefit from any compensation Mr. Altenburg earns with Three Lakes Advisors, Inc. This may present a conflict of interest because as an

investment advisor representative of our firm and in his capacity as a vice president of Three Lakes Advisors, Inc., Mr. Altenburg may have a financial incentive to effect commodity transactions on your behalf. In efforts to mitigate any conflicts of interest, our firm does not allow Mr. Altenburg to recommend any investment products offered through Three Lakes Advisors, Inc. to relationships originated by our firm. Our firm and investment advisor representatives must act in our client's best interests. Clients are under no obligation to purchase investment and/or insurance products through any person affiliated with our firm.

Mitchell Fee is a branch manager of Three Lakes Advisors, Inc., a commodities brokerage firm. Mr. Fee maintains his commodity trading license with Three Lakes Advisors, Inc. In his separate capacity as a branch manager of Three Lakes Advisors, Inc., he may receive compensation in connection with commodities or futures related products. Compensation Mr. Fee earns with Three Lakes Advisors, Inc. is separate from our advisory fees and we do not benefit from any compensation Mr. Fee earns with Three Lakes Advisors, Inc. This may present a conflict of interest because as an investment advisor representative of our firm and in his capacity as a branch manager of Three Lakes Advisors, Inc., Mr. Fee may have a financial incentive to effect commodity transactions on your behalf. In efforts to mitigate any conflicts of interest, our firm does not allow Mr. Fee to recommend any investment products offered through Three Lakes Advisors, Inc. to relationships originated by our firm. Our firm and investment advisor representatives must act in our client's best interests. Clients are under no obligation to purchase investment and/or insurance products through any person affiliated with our firm.

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

A. Code of Ethics

T&T has implemented a Code of Ethics that defines our fiduciary commitment to each Client. This Code of Ethics applies to all persons associated with T&T. The Code of Ethics was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. T&T and its personnel owe a duty of loyalty, fairness and good faith towards each Client. We put the Client's interest first which includes, but is not limited to, a duty of care, loyalty, obedience, and utmost good faith. It is the obligation of T&T associates to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code of Ethics covers a range of topics that may include; general ethical principles, reporting personal securities trading, reportable securities, initial public offerings and private placements, reporting ethical violations, distribution of the Code of Ethics, review and enforcement processes, amendments to Form ADV and supervisory procedures. T&T has written its Code of Ethics to meet and exceed regulatory standards. To request a copy of our Code of Ethics, please contact us at 805-886-8140.

B. Personal Trading with Material Interest

Neither T&T nor any persons associated with T&T have any material financial interest in client transactions beyond the provision of investment advisory services as described in this brochure.

C & D. Personal Trading Practices

Our firm or persons associated with our firm buy or sell the same securities that we recommend to you or securities in which you are already invested. A conflict of interest exists in such cases because we have the ability to trade ahead of you and potentially receive more favorable prices than you will receive. To mitigate this conflict of interest, it is our policy that neither our firm nor persons associated with our firm shall have priority over your account in the purchase or sale of securities.

Aggregated Trading

Our firm or persons associated with our firm may buy or sell securities for you at the same time we or persons associated with our firm buy or sell such securities for our own account. We may also combine our orders to purchase securities with your orders to purchase securities ("aggregated trading"). Refer to the *Brokerage Practices* section in this brochure for information on our aggregated trading practices.

A conflict of interest exists in such cases because we have the ability to trade ahead of you and potentially receive more favorable prices than you will receive. To eliminate this conflict of interest, it is our policy that neither our firm nor persons associated with our firm shall have priority over your account in the purchase or sale of securities.

Item 12 Brokerage Practices

A. The custodian and brokers we use

We do not maintain custody of your assets under our management, although we may be deemed to have limited custody of your assets if you give us authority to withdraw our fees from your account (see Item 15—Custody, below). Your assets must be maintained in an account at a qualified custodian, generally a broker-dealer or bank ("Custodian"). Currently, we recommend that our clients use Charles Schwab & Co., Inc. (Schwab), a registered broker- dealer, member SIPC, as the qualified custodian for most of their accounts under our management to take advantage of institutional capabilities we currently have access to at Schwab. We previously requested the brokerage and custodial services of TD Ameritrade, Inc., which was acquired by The Charles Schwab Corporation in the fall of 2020. Schwab is currently the only Custodian at which we have access to certain institutional capabilities. However, when we feel a client account's anticipated needs can be best met by another custodian, we will recommend that account be held at that other custodian so long as that custodian supports the required limited power of attorney authority and capabilities for our firm to provide you with the services you are requesting.

We are independently owned and operated and are not affiliated with Schwab. Schwab will hold your assets in a brokerage account and will buy and sell securities when we instruct them to. While we recommend that you use Schwab as custodian/broker, you will decide whether to do so and will open your account with Schwab by entering into an account agreement directly with them. We do not open the account for you, although we may assist you in doing so. Conflicts of interest associated with our use of institutional services at Schwab are described below as well as in Item 14 (Client Referrals and Other Compensation).

How we select brokers/custodians

We recommend to use a custodian that will hold your assets and execute transactions with a combination of capabilities that will allow us to provide you with high quality services. When considering whether the terms that Schwab provides are, overall, most advantageous for an account when compared with other available providers and their services, we consider a wide range of factors, including:

- Combination of transaction execution services and asset custody services (generally without a separate fee for custody)
- Capability to execute, clear, and settle trades (buy and sell securities for your account)
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.)
- Breadth of available investment products (stocks, bonds, mutual funds, exchange-traded funds "ETFs", etc.)
- Types of accounts offered and their features, such as various retirement plans, health savings accounts, 529 plans, etc.
- Availability of investment research and tools that assist us in making investment decisions
- Quality of services and convenience to clients
- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate the prices
- Reputation, financial strength, security, and stability
- Prior service to us and our clients
- Availability of other products and services that benefit us, as discussed below (see "Products and services available to us from Schwab")

Your brokerage and trading costs
For our clients' accounts that Schwab maintains, Schwab generally does not charge you separately for custody services but is compensated by charging you execution costs (commissions) or other fees on trades that it executes or that settle into your Schwab account. Certain trades (for example, many mutual funds, and U.S. exchange-listed equities and ETFs) may not incur Schwab commissions or transaction fees. Schwab is also compensated by earning interest on the uninvested cash in your account in Schwab's Cash Features Program.

We are not required to select the broker or dealer that charges the lowest transaction costs overall or on each individual trade placed for your accounts, even if that broker provides execution quality comparable to other brokers or dealers. Although we are not required to execute all trades through Schwab, we have determined that having Schwab execute most trades for accounts we manage that are held at Schwab is consistent with our duty to seek to obtain "best execution" of your trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above (see "How we select brokers/ custodians"). By using another broker or dealer you may pay lower or higher transaction costs.

Products and services available to us from Schwab
Schwab Advisor Services™ is Schwab's business serving independent investment advisory firms like ours. They provide us and our clients with access to their institutional brokerage services (trading, custody, reporting, and related services), many of which are not typically available to retail customers at Schwab or other retail brokerages. However, certain retail investors may be able to get institutional brokerage services from Schwab without going through our firm. Schwab also makes available various support services. Some of those services help us manage or administer our clients' accounts, while others help us manage and grow our business. Schwab's support services are generally available at no charge to us. Following is a more detailed description of Schwab's support services:

Services that benefit you
Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. Schwab's services described in this paragraph generally benefit you and your account.

Services that may not directly benefit you
Schwab also makes available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our clients' accounts. These products may include financial publications, information about particular companies and industries, research software, and other products or services that provide lawful and appropriate assistance to our firm in the performance of our investment decision-making responsibilities. Such research products and services are provided to all investment advisers that utilize the institutional services platforms of these firms, and are not considered to be paid for with soft dollars. However, you should be aware that the commissions charged by a particular broker for a particular transaction or set of transactions may be greater than the amounts another broker who did not provide research services or products might charge. In addition to investment research, Schwab also makes available software and other technology that:

- Provide access to client account data (such as duplicate trade confirmations and account statements)
- Facilitate trade execution and allocate aggregated trade orders for multiple client accounts
- Provide pricing and other market data
- Facilitate payment of our fees from our client's accounts
- Assist with back-office functions, recordkeeping, and client reporting

Services that generally benefit only us
Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:

- Educational conferences and events
- Consulting on technology, compliance, legal and business needs
- Publications and conferences on practice management and business succession
- Access to employee benefits providers, human capital consultants, and insurance providers
- Marketing consulting and support

Schwab may provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. Schwab may also discount or waive its fees for some of these services or pay all or a part of a third party's fees.

Our interest in Schwab's services
The availability of these services from Schwab benefits us because we do not have to produce or purchase them. We do not have to pay for Schwab's services. (These services are not contingent upon us committing any specific amount of business to Schwab in trading commissions or assets in custody.) This may create an incentive to recommend that you maintain your account with Schwab, based on our interest in receiving Schwab's services that benefit our business rather than based on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a potential conflict of interest. We believe, however, that our selection of Schwab as custodian and broker is in the best interests of our clients. Our selection is primarily supported by the scope, quality, and price of Schwab's services (see "How we select brokers/custodians") and not Schwab 's services that benefit only us.

Research and Other Soft Dollar Benefits
We do not have any soft dollar arrangements.

2. Brokerage Referrals - T&T does not receive any compensation from any third party in connection with the recommendation for establishing a brokerage account and we do not receive client referrals from broker-dealers in exchange for cash or other compensation, such as brokerage services or research.

B. Aggregated Trades

We combine multiple orders for shares of the same securities purchased for discretionary advisory accounts we manage (this practice is commonly referred to as "aggregated trading"). We will then distribute a portion of the shares to participating accounts in a fair and equitable manner. Generally, accounts will pay a fixed transaction cost regardless of the number of shares transacted. In certain cases, each participating account pays an average price per share for all transactions and pays a proportionate share of all transaction costs on any given day. In the event an order is only partially filled, the shares will be allocated to participating accounts in a fair and equitable manner, typically in proportion to the size of each client's order. Accounts owned by our firm or persons associated with our firm may participate in aggregated trading with your accounts; however, they will not be given preferential treatment.

Where T&T does not aggregate trades, clients may pay different prices for the same securities transactions than other clients pay. Furthermore, T&T may not be able to buy and sell the same quantities of securities and clients may pay higher commissions, fees, and/or transaction costs than other clients.

Item 13 Review of Accounts

A. Frequency of Reviews

Accounts are monitored on a regular and continuous basis by T&T Capital Management to ensure the advisory services provided to you are consistent with your investment needs and objectives. Tim Travis, Chief Investment Officer/President, will conduct all reviews.

B. Causes for Reviews

In addition to the investment monitoring noted above in *Item 13 - Review of Accounts*, each Client account shall be reviewed on an ongoing basis. Reviews may be conducted more or less frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account. The Client is encouraged to notify T&T if changes occur in financial situation that might adversely affect the investment plan. Additional reviews may be triggered by material market, economic or political events.

C. Review Reports

The Client will receive brokerage statements no less than quarterly from the trustee or custodian. These brokerage statements are sent directly from the custodian to the Client. The Client may also establish electronic access to the custodian's website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client's account[s]. When requested by the Client, the Advisor may provide the Client with a report regarding their accounts.

Item 14 Client Referrals and Other Compensation

A. Compensation Received by T&T

Notwithstanding that certain associated persons of our firm are licensed as independent insurance agents and may be eligible to collect sales commissions in connection with the sale of certain insurance products, such associated persons will refrain from recommending and/or selling insurance products to our advisory clients for which they may receive a sales commission. Accordingly, T&T does not receive commissions or other compensation from product sponsors, broker dealers, insurance companies or agencies or any other un-related third parties. T&T may refer Clients to various third parties to provide certain financial services necessary to meet the goals of its Clients.

We do not receive compensation for any referrals.

We receive an economic benefit from Schwab in the form of the support products and services it makes available to us and other independent investment advisors whose clients maintain their accounts at Schwab. We benefit from the products and services provided because the cost of these services would otherwise be borne directly by us, and this creates a conflict. These products and services, how they benefit us, and the related conflicts of interest are described above (see Item 12—Brokerage Practices).

B. Client Referrals from Solicitors

T&T directly compensates former employees/solicitors for past client referrals. In order to receive a cash referral fee from our firm, Solicitors must comply with the requirements of the jurisdictions in which they operate. If you were referred to our firm by a Solicitor, you should have received a copy of this brochure along with the Solicitor's disclosure statement at the time of the referral. The compensation from our firm to the Solicitor is 50% of the quarterly advisory fee you pay us pursuant to the terms of the Investment Advisory Agreement. You will not pay additional fees because of this referral arrangement. This compensation does not apply if a Solicitor is not involved. Referral fees paid to a Solicitor are contingent upon your entering into an advisory agreement with our firm. Therefore, a Solicitor has a financial incentive to recommend our firm to you for advisory services. This creates a conflict of interest; however, you are not obligated to retain our firm for advisory services. Comparable services and/or lower fees may be available through other firms. We will ensure that solicitors that receive a fee for client referrals are registered or exempt from registration as investment advisers or investment adviser representatives.

C. Compensation From Publication of Articles

Certain investment adviser representatives of the firm are compensated by Seeking Alpha when their articles are accepted for publication on the www.seekingalpha.com website. Please refer to the ADV Part 2B Supplemental Brochure for your investment adviser representative for additional information regarding compensation for outside business activities.

Item 15 Custody

T&T does not accept or maintain custody of any Client accounts. All Clients must place their assets with a qualified custodian. Clients are required to select their own custodian to retain their funds and securities and direct T&T to utilize that custodian for the Client's security transactions. T&T is deemed to have limited custody solely because advisory fees are directly deducted from the client's account by the custodian on behalf of T&T. Please see procedures below. As paying agent for our firm, your

independent custodian, upon your authorization, will directly debit your account(s) for the payment of our advisory fees. You will receive account statements from the qualified custodian(s) holding your funds and securities at least quarterly. The account statements from your custodian(s) will indicate the amount of our advisory fees deducted from your account(s) each billing period. T&T encourages Clients to review statements provided by account custodian. For more information about custodians and brokerage practices, please see *Item 12 - Brokerage Practices* of this firm brochure.

If Clients have a question regarding the account statement, or if Clients do not receive a statement from the account custodian, please contact T&T directly at the telephone number on the cover page of this brochure.

Item 16 Investment Discretion

T&T generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by T&T. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an Investment Advisory Agreement containing all applicable limitations to such authority. All discretionary trades made by T&T will be in accordance with each Client's investment objectives and goals.

Item 17 Voting Client Securities

T&T does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. At your request, we may offer you advice regarding corporate actions and the exercise of your proxy voting rights.

Item 18 Financial Information

Neither T&T, nor its management has any adverse financial situations that would reasonably impair the ability of T&T to meet all obligations to its Clients. Neither T&T, nor any of its advisory persons, has been subject to a bankruptcy or financial compromise. T&T is not required to deliver a balance sheet along with this Brochure as the firm does not collect advance fees of more than $1200 per client for services to be performed six months or more in advance.

Item 19 Requirements for State Registered Advisors

This section is not applicable to our firm because we are an SEC registered investment adviser.

Additional Information

Trade Errors
In the event a trading error occurs in your account, our policy is to restore your account to the position it should have been in had the trading error not occurred. Depending on the circumstances, corrective actions may include canceling the trade, adjusting an allocation, and/or reimbursing the account.

Class Action Lawsuits
We do not determine if securities held by you are the subject of a class action lawsuit or whether you are eligible to participate in class action settlements or litigation nor do we initiate or participate in litigation to recover damages on your behalf for injuries as a result of actions, misconduct, or negligence by issuers of securities held by you.



Timothy Travis

TT Capital Management LLC

Doing Business As

T&T Capital Management

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WWW.TTVALUEINVESTING.COM

May 15, 2025

FORM ADV PART 2B
BROCHURE SUPPLEMENT

This brochure supplement provides information about Timothy Travis that supplements the T&T Capital Management brochure. You should have received a copy of that brochure. Contact us at 805-886-8140 if you did not receive T&T Capital Management's brochure or if you have any questions about the contents of this supplement.

Additional information about Timothy Travis (CRD # 4698981) is available on the SEC's website at www.adviserinfo.sec.gov.

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Item 2 Educational Background and Business Experience

Timothy Travis
Year of Birth: 1982
Formal Education After High School:

- University of California, Santa Barbara, BA Economics

Business Background:

- TT Capital Management, LLC d/b/a T&T Capital Management, CEO and CIO, 8/2011 - Present
- TTCM LLC, CEO/CIO/Owner/Investment Adviser Representative, 1/2014 - 01/2016
- Diverse Financial Investment Advisory Group, Investment Adviser Representative, 1/2014 - 6/2014
- Opvest Wealth Management, Investment Adviser Representative, 4/2007 - 10/2011

Item 3 Disciplinary Information

Form ADV Part 2B requires disclosure of certain criminal or civil actions, administrative proceedings, and self-regulatory organization proceedings, as well as certain other proceedings related to suspension or revocation of a professional attainment, designation, or license. Mr. Timothy Travis has no required disclosures under this item.

Item 4 Other Business Activities

Timothy Travis is separately licensed as an independent insurance agent. In this capacity, he can effect transactions in insurance products for his clients and earn commissions for these activities. The fees you pay our firm for advisory services are separate and distinct from the commissions earned by Mr. Travis for insurance related activities. This presents a conflict of interest because Mr. Travis may have an incentive to recommend insurance products to you for the purpose of generating commissions rather than solely based on your needs. However, you are under no obligation, contractually or otherwise, to purchase insurance products through any person affiliated with our firm.

Timothy Travis is member and contributor of SeekingAlpha.com, a platform for investment research. Mr. Travis's duties as the member and contributor of SeekingAlpha.com do not create a conflict of interest to his provision of advisory services through T&T Capital Management.

Item 5 Additional Compensation

Refer to the *Other Business Activities* section above for disclosures on Mr. Travis's receipt of additional compensation as a result of his other business activities.

Also, refer to the *Fees and Compensation*, *Client Referrals and Other Compensation, and Other Financial Industry Activities and Affiliations* section(s) of T&T Capital Management's firm brochure for additional disclosures on this topic.

Item 6 Supervision

As the CEO of T&T Capital Management, Timothy Travis supervises the advisory activities of our firm. Timothy Travis can be reached at 805-886-8140.

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Peter Travis

TT Capital Management LLC

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May 15, 2025

FORM ADV PART 2B
BROCHURE SUPPLEMENT

This brochure supplement provides information about Peter Travis that supplements the T&T Capital Management brochure. You should have received a copy of that brochure. Contact us at 805-886-8140 if you did not receive T&T Capital Management's brochure or if you have any questions about the contents of this supplement.

Additional information about Peter Travis (CRD # 5830345) is available on the SEC's website at www.adviserinfo.sec.gov.

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Item 2 Educational Background and Business Experience

Peter Travis
Year of Birth: 1977
Formal Education After High School:

- Peter Travis has no formal educational background

Business Background:

- TT Capital Management, LLC d/b/a T&T Capital Management, Chief Operating Officer/Chief Compliance Officer, 9/2011 - Present
- TTCM LLC, Investment Adviser Representative, 2/2014 - 01/2016
- T&T Investment Management LLC, COO/IAR, 8/2010 - 10/2011
- Options Investments, Inc., Intern, 6/2010 - 6/2011
- Opvest Wealth Management, Investment Adviser Representative, 8/2010 - 10/2011

Item 3 Disciplinary Information

Form ADV Part 2B requires disclosure of certain criminal or civil actions, administrative proceedings, and self-regulatory organization proceedings, as well as certain other proceedings related to suspension or revocation of a professional attainment, designation, or license. Mr. Peter Travis has no required disclosures under this item.

Item 4 Other Business Activities

Peter Travis is not actively engaged in any other business or occupation (investment-related or otherwise) beyond his capacity as Chief Operating Officer of T&T Capital Management. Moreover, Mr. Travis does not receive any commissions, bonuses or other compensation based on the sale of securities or other investment products.

Item 5 Additional Compensation

Peter Travis does not receive any additional compensation beyond that received as an Chief Operating Officer of T&T Capital Management.

Item 6 Supervision

In the supervision of our associated persons, advice provided is limited based on the restrictions set by T&T Capital Management, and by internal decisions as to the types of investments that may be included in client portfolios. We conduct periodic reviews of client holdings and documented suitability information to provide reasonable assurance that the advice provided remains aligned with each client's stated investment objectives and with our internal guidelines.

My supervisor is: Timothy Travis, CEO

Supervisor phone number: 805-886-8140

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Scott A. Altenburg
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November 14, 2025

FORM ADV PART 2B
BROCHURE SUPPLEMENT

This brochure supplement provides information about Scott A. Altenburg that supplements the T&T Capital Management brochure. You should have received a copy of that brochure. Contact us at 805-886-8140 if you did not receive T&T Capital Management's brochure or if you have any questions about the contents of this supplement.

Additional information about Scott A. Altenburg (CRD # 2357667) is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Educational Background and Business Experience

Scott A. Altenburg
Year of Birth: 1970
Formal Education After High School:

- University of Wisconsin-Madison, BS Economics, 1992

Business Background:

- TT Capital Management, LLC d/b/a T&T Capital Management, Senior Vice President/Investment Adviser Representative, 3/2017 - Present
- Three Lakes Trading Company, Associated Person/Vice President, 08/2018 - Present
- Rick Nelson Insurance Solutions, LLC, Resident Insurance Producer, 7/2014 - Present
- Kingsview LLC, Branch Manager, 11/2014 - 08/2018
- Kingsview Asset Management, Senior Vice President/Investment Adviser Representative, 6/2015 - 3/2017

Item 3 Disciplinary Information

The National Futures Association took certain disciplinary actions against Scott Altenburg for alleged violations of certain securities regulations, rules, and/or statutory provisions. The matters have been resolved. Scott Altenburg has no outstanding issues and is registered without restriction as an investment adviser representative on behalf of T&T Capital Management. The details on these matters related to Scott Altenburg's disciplinary history can be found on the IAPD. The IAPD link is www.adviserinfo.sec.gov. and searching Mr. Altenburg's individual CRD number (2357667).

Item 4 Other Business Activities

Scott A. Altenburg is separately licensed as an independent insurance agent. In this capacity, he can effect transactions in insurance products for his clients and earn commissions for these activities. The fees you pay our firm for advisory services are separate and distinct from the commissions earned by Mr. Altenburg for insurance related activities. This presents a conflict of interest because Mr. Altenburg may have an incentive to recommend insurance products to you for the purpose of generating commissions rather than solely based on your needs. However, you are under no obligation, contractually or otherwise, to purchase insurance products through any person affiliated with our firm.

Scott A. Altenburg is a Vice President of Three Lakes Trading Company, a Independent Introducing Broker. Mr. Altenburg's duties as the Branch Manager and Senior Vice President of Three Lakes Trading Company do not create a conflict of interest to his provision of advisory services through T&T Capital Management.

Item 5 Additional Compensation

Refer to the *Other Business Activities* section above for disclosures on Mr. Altenburg's receipt of additional compensation as a result of his other business activities.

Also, refer to the *Fees and Compensation*, *Client Referrals and Other Compensation, and Other Financial Industry Activities and Affiliations* section(s) of T&T Capital Management's firm brochure for additional disclosures on this topic.

Item 6 Supervision

In the supervision of our associated persons, advice provided is limited based on the restrictions set by T&T Capital Management, and by internal decisions as to the types of investments that may be included in client portfolios. We conduct periodic reviews of client holdings and documented suitability information to provide reasonable assurance that the advice provided remains aligned with each client's stated investment objectives and with our internal guidelines.

My supervisor is: Timothy Travis, CEO

Supervisor phone number: 805-886-8140



Mitchell Fee

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August 14, 2025

FORM ADV PART 2B
BROCHURE SUPPLEMENT

This brochure supplement provides information about Mitchell Fee that supplements the T&T Capital Management brochure. You should have received a copy of that brochure. Contact us at 805-886-8140 if you did not receive T&T Capital Management's brochure or if you have any questions about the contents of this supplement.

Additional information about Mitchell Fee (CRD # 5950554) is available on the SEC's website at www.adviserinfo.sec.gov.

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Item 2 Educational Background and Business Experience

Mitchell Fee
Year of Birth: 1979
Formal Education After High School:

- Riverside Community College, Business , 9/1998 - 9/2000

Business Background:

- TT Capital Management, LLC d/b/a T&T Capital Management, Investment Adviser Representative, 3/2017 - Present
- American Hartfold Gold, Account Executive, 11/2023 - 08/2025
- Three Lakes Advisors, Branch Manager/Associated Person, 4/2017 - Present
- Kingsview LLC, Associated Person, 11/2014 - 05/2017
- Kingsview Asset Management, Investment Adviser Representative, 6/2015 - 3/2017
- Investcore Partners, Sr. Account Executive, 7/2012 - 11/2014
- Unemployed, 3/2012 - 7/2012
- Vision Investment Advisors, Registered Representative, 6/2011 - 6/2012
- Option Investments, Broker, 6/2004 - 3/2012

Item 3 Disciplinary Information

The National Futures Association took certain disciplinary actions against Mitchell Fee for alleged violations of certain securities regulations, rules, and/or statutory provisions. The matters have been resolved. Mitchell Fee has no outstanding issues and is registered without restriction as an investment adviser representative on behalf of T&T Capital Management. The details on these matters related to Mitchell Fee's disciplinary history can be found on the IAPD. The IAPD link is www.adviserinfo.sec.gov. and searching Mr. Fee's individual CRD number (5950554).

Item 4 Other Business Activities

Mitchell Fee is separately licensed as an independent insurance agent. In this capacity, he can effect transactions in insurance products for his clients and earn commissions for these activities. The fees you pay our firm for advisory services are separate and distinct from the commissions earned by Mr. Fee for insurance related activities. This presents a conflict of interest because Mr. Fee may have an incentive to recommend insurance products to you for the purpose of generating commissions rather than solely based on your needs. However, you are under no obligation, contractually or otherwise, to purchase insurance products through any person affiliated with our firm.

Mitchell Fee is the Branch Manager and Associated Person of Three Lakes Advisors, an Introducing Broker. Mr. Fee's duties as the Branch Manager and Associated Person of Three Lakes Advisors do not create a conflict of interest to his provision of advisory services through T&T Capital Management.

Item 5 Additional Compensation

Mitchell Fee does not receive additional compensation resulting from his role as Investment Adviser Representative of our firm. Mr. Fee may, however, receive additional compensation in his capacities as an independent insurance agent and Branch Manager/Associate with Three Lakes Advisors. Any compensation that Mr. Fee may earn in these outside capacities is separate and apart from the compensation Mr. Fee may receive as an Investment Adviser Representative of our firm.

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Item 6 Supervision

In the supervision of our associated persons, advice provided is limited based on the restrictions set by T&T Capital Management, and by internal decisions as to the types of investments that may be included in client portfolios. We conduct periodic reviews of client holdings and documented suitability information to provide reasonable assurance that the advice provided remains aligned with each client's stated investment objectives and with our internal guidelines.

My supervisor is: Timothy Travis, CEO

Supervisor phone number: 805-886-8140

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