



Gravity



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This brochure provides information about the qualifications and business practices of Gravity Capital Partners, LLC. (“GCP”). If you have any questions about the contents of this brochure, please contact us at 970 GRAVITY or info@gravityinvestments.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Additional information about GCP also is available on the SEC’s website at www.adviserinfo.sec.gov.

“Registration” does not imply a certain level of skill or training.

2

MATERIAL CHANGES

Gravity Capital Partners leverages our Gsphere Diversification Optimization™ as a Custom Institutional RoboAdvisory platform enabling Diversification Weighted® sleeves, asset allocation models, diversification overlays and custom portfolio construction for family offices, advisors and institutional investor clientele. **Advisor clients may freely run their strategies on our custom branded roboadvisory platform.**

3 TABLE OF CONTENTS

Item 4. Advisory Business.....	4
Background	5
Regulatory Assets under Management as of May 27, 2016.....	6
Item 5. Fees and Compensation.....	7
General Fee Information	8
Item 6. Performance-Based Fees and Side-By-Side Management.....	9
Item 7. Types of Clients.....	10
Item 8. Methods of Analysis, Investment Strategies and Risk of Loss.....	11
Item 9. Disciplinary History.....	19
Item 10. Other Financial Industry Activities and Affiliations.....	20
Item 12. Brokerage Practices.....	23
Item 13. Review of Client Models.....	24
Item 14. Client Referrals and Other Compensation.....	25
Item 15. Custody.....	26
Item 16. Investment Discretion.....	28
Item 17. Voting Client Securities.....	29
Item 18. Financial Information.....	30
Item 19. State Regulation.....	31
Other Information.....	33
Class Actions and Other Legal Proceedings.....	33
Privacy Notice.....	33
<i>Our Promise to You</i>	33
<i>Information Provided</i>	33
<i>How We Manage and Protect Your Personal Information</i>	33
<i>Client Notifications</i>	34

4

ADVISORY BUSINESS

Background

Gravity Capital Partners, LLC (“GCP”) is a fee-based investment management firm that began in 2010 located in Denver, Colorado. It is a registered investment adviser registered with the state of Colorado.

GCP is an asset management firm specializing in working with Advisors, portfolio managers, and other professionals as a sub advisor to build and maintain custom model portfolios based on our patented logic for True Diversification®. We refer to the investment portfolios produced by this process and meeting our standards as being “Diversification Weighted®.” Such portfolios typically exhibit more diversification and research exhibits that this increase in diversification translates into a material reduction of losses in down markets with some reduction to performance during bull markets. Additionally, we may bundle software tools and platforms with our professional services to help our advisory clients report, educate, understand and evangelize diversification for their own clientele. In designing the portfolios, GCP uniquely utilizes an affiliated company’s patented software for interactive 3D graphics.

GCP clients obtain a clear understanding of diversification with our proprietary measurement techniques and visualization. An illustration of the visualization follows below;

selection, investment analysis, allocation of investments, rebalancing recommendations and ongoing monitoring services for the portfolio.

GCP will rebalance the model periodically, as it deems appropriate, to meet the client's objectives. GCP historically typically did not trade the portfolios, but instead notified the adviser of the trade allocations for execution. Rebalances are also typically handled by the adviser once the rebalance specifications are given to the Advisor by GCP. Advisers and institutions are advised and expected to understand that GCP's past performance is not a guarantee of future results and that certain market and economic risks exist that may adversely affect a model's performance. Losses in capital could result in those models.

Going forward, we provide portfolio management services on both a discretionary and non-discretionary basis to the model portfolio per se. Each client may designate a particular and/or custom set of constraints and other processes in concert with the stated objectives of a portfolio. GCP has authority to manage these portfolios within that framework and allows for periodic revision of such policies.

GCP's clients include other third party investment advisers whereby GCP acts as the sub-advisor. In such relationships, GCP will not directly manage the primary adviser's clients' accounts and the primary adviser will be responsible for determining which of the models the clients are invested with.

GCP acts as a model manager, third party strategist, sub-advisor, co-manager or overlay manager in different scenarios. **Advisor clients may freely run their strategies on our custom branded roboadvisory platform.**

Our advice is often tailored around the existing business practices of our clients, typically embracing their processes for security selection and strategy and combining our expertise in process, optimization and technology.

We are not affiliated with a Broker Dealer or Custodian and we do not receive any compensation from them. We are non-conflicted and unbiased as we inherit an advisors broker dealer or custodial relationships.

GCP is paid in the same manner as the client advisor in a manner consistent with their retail practice such as billing fees in advance or in arrears. Hence, our client's respective clientele may terminate at any time.

Regulatory Assets under Management as of May 27, 2016

Discretionary: \$0\$

As a sub advisor, typically assets count as regulatory AUM on behalf of our clients and AUA for Gravity.

5

Fees and Compensation

GCP's fee includes compensation for predominantly advisory (both AUM and AUA) and secondarily consulting services provided by GCP. There is no redemption, exit fees or transaction fees charged by GCP. Fees may vary based on the size of the client and our assets under sub advisement, number of model portfolios provided, complexity of the portfolios, extent of activity in the account or other reasons agreed upon by GCP and the advisory client.

Fees will generally range between .25% and .90%. The negotiated fees are disclosed in the agreement between GCP and the client. Gravity also licenses our Custom Institutional Roboadvisory to professional investors charging AUA based basis point fees for the technology with both the discretion and the end client fiduciary responsibility belonging to our client.

GCP may enter into fixed fee consulting work from time to time perform specific consulting or management consulting projects for advisors and institutions if the opportunity is strong for ongoing AUM fee based work.

GCP has entered into performance based fee engagement(s) in the accredited investor space and is anticipating the launch of a hedge fund Diversification Optimization™ overlay.

In addition, all fees paid to GCP for investment advisory services are separate from any fees and expenses charged to shareholders of any mutual fund shares or mutual fund companies. A complete explanation of the expenses charged by the mutual fund is contained in each fund's prospectus.

The fees for accounts are based on an annual percentage of assets under management or assets under administration. The fee is applied to the account asset value on a pro-rated basis, billed either monthly or quarterly in either arrears or preferably in advance, depending on what is negotiated in the agreement. The initial fee will be based upon the date the account is accepted for management by execution of the investment advisory contract by GCP. Thereafter, the fee will be based on the market value of the account on the last day of the previous calendar quarter and will cover the period from the first day of the calendar quarter through the last day of the calendar quarter. GCP may also bill monthly. The market value will be determined as reported by the adviser's Custodian. The Adviser will report the assets to GCP. Fees are assessed on all assets under management, including securities, cash and money market balances.

Upon termination, the advisor is solely responsible for monitoring the portfolio in the accounts, and GCP as an investment sub adviser will have no further obligation to act or advise with respect to those assets.

GCP receives no compensation for any commission business; please see section on conflicts of interest. GCP inherits the existing brokerage relationships and commission structure of our clients where such structures vary from firm to firm and many of such costs are born directly to the investor.

6

Performance-Based Fees and Side-By-Side Management

Performance based fees only as applicable and prudent in the accredited investor space with the belief that such investor would be professionally sophisticated.

7

Types of Clients

GCP provides or can provide investment sub advisory services to registered advisors, broker dealers, family offices, institutions, fund companies, pension and profit sharing plan consultants, corporations, trust, banks, charitable/non-profit organizations, and government entities and hedge funds. GCP maintains a clientele of professional investors. Our Code of Ethics and Personal Trading Policy (“Code”) requires employees to report investments in any funds we may manage.

All sub advisory or consulting clients are required to enter into an investment management agreement with us prior to us providing any services. We prefer to manage advisor accounts with a minimum of \$10 million in aggregate assets; minimums may be subject to negotiation though our policy is to preferably sub advise on the entire wealth manager’s practice under a collective best efforts conversion with a minimum of \$20M.

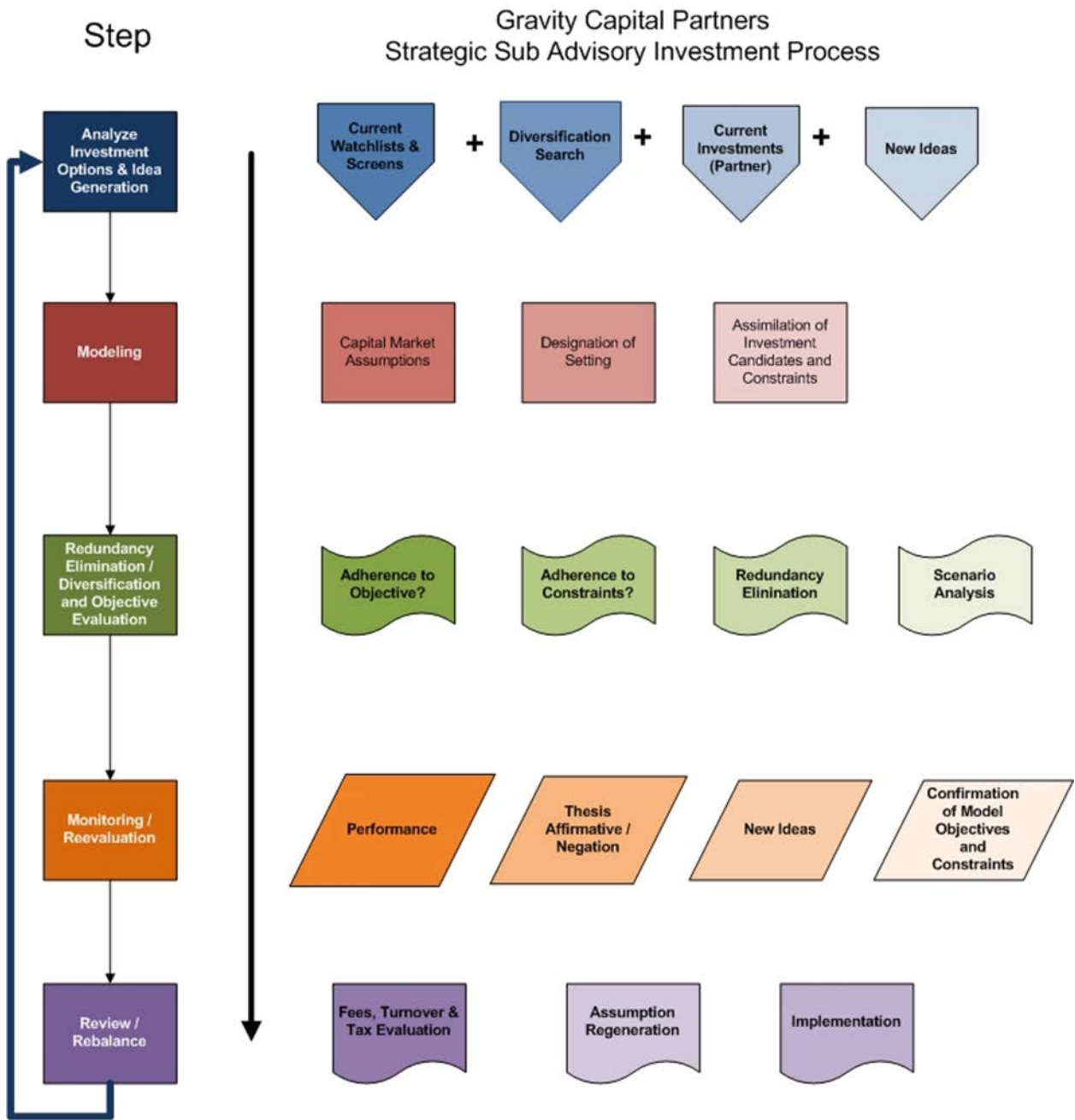
Our advice is tailored around the existing business practices of our clients, embracing their processes and combining our expertise in our largely systematic, roboadvisory process, through our Diversification Optimization™ and institutional platform technology. Our advice and technology services are further tailored by the AUM-AUA minimums placed with us by our advisor client.

8

Method of Analysis, Investment Strategies and Risk of Loss

Based on our proprietary logic we can create custom model portfolios that generally conform to the following process. For any particular client relation or model various steps or elements may be shared, omitted or designated as the responsibility of our client or a third party.

Advisor clients may freely run their strategies on our custom branded roboadvisory platform.



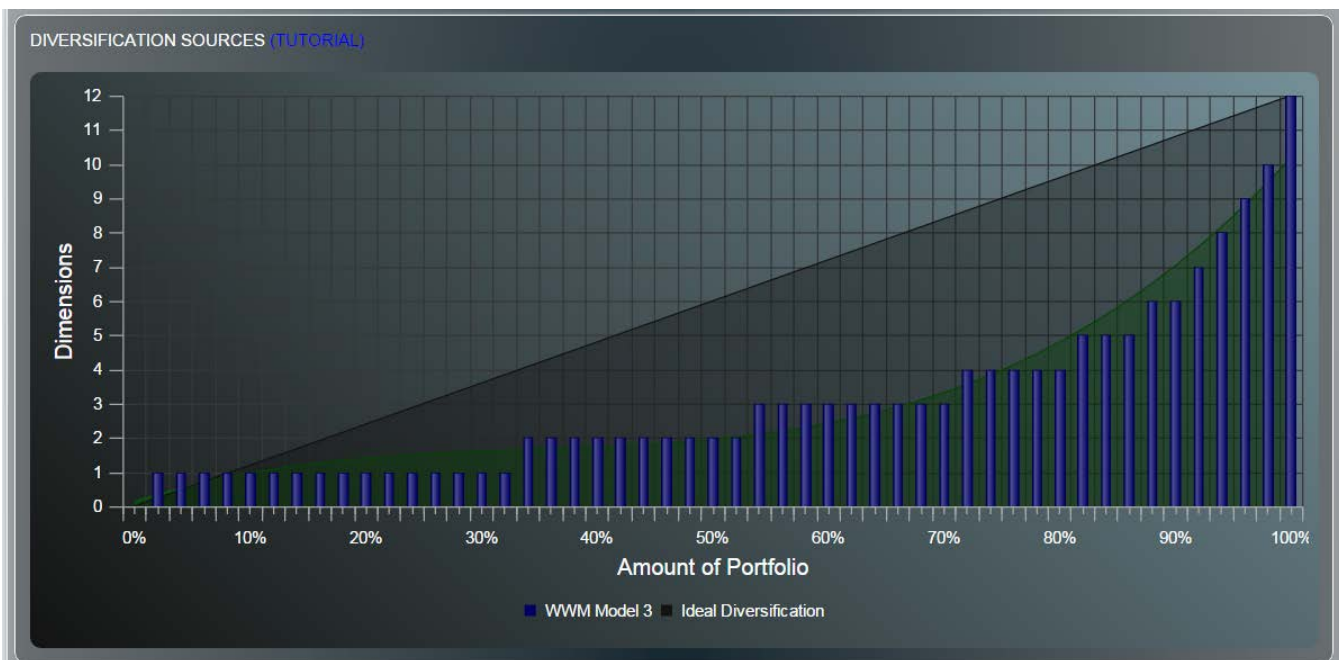
The creation and practice of this investment process does not protect investors from risk. While GCP is unique in our view of risk because of our knowledge of diversification, neither diversification or a sound investment process will necessarily protect portfolios from loss or protect against losing investments in loss of capital.

We tend to define risk with the gravest interpretations. We do not associate more risk with more return, but believe that risk is the antagonist to returns.

Diversification measurement, optimization, visualization and search are catalytic to reducing risk in a portfolio, especially systematic and non-systematic risks. Contrary to academic theory based on compounding assumptions, we firmly believe that systemic risk may be diversified. We analyze and manage system risk in model portfolios by seeking to minimize the exposure of a portfolio to principal risk factors or dimensions. Our technologies to measure system risk do not eliminate systemic risk from portfolios.

We do expect to reduce the systemic influence in the portfolio however, depending of the strategy such risk may only realize a marginal reduction, and no reduction at all can be known with certainty. Clients of the firm may request a dimension analysis to better understand the impact of systemic risk in their models.

An illustration of this analysis follows. The methodology and graphics are patented under patent # 8,156,030



Substantive risks that are not impacted by True Diversification® include operational risk and behavioral risk. The impact of True Diversification® on liquidity risk, interest rate risk, and event risks is difficult to predict and will vary with the particular model and investment options.

GCP models endeavor to avoid assets containing liquidity risks and counterparty risks, preferring assets that can be sold at nationally recognized exchange.

Gravity Capital Partners invests in assets of relatively liquid securities. During extraordinary periods of turmoil and extreme overall market risk, which cannot be statistically ascertained from historical data or otherwise predicted the mere commonality of investing in liquid securities provides a potential antagonist to the efficacy of diversification practices.

Additional risks which may be collectively categorized as investment risks are, stock risk, sector risk, country risk, foreign exchange risk, etc. A portfolio's unique exposure to such risks will typically be diversified and such risks are deliberately assumed by the portfolio manager or investment committee.

All portfolio models are scientifically analyzed based on various diversification and risk measures.

Other Information

GCP does not offer any products or services that guarantee rates of return on investments for any time period to any client. All clients assume the risk that investment returns may be negative or below the rates of return of other investment advisers, market indices or investment products. We may invest in securities issued by clients who are publicly-held companies for other client accounts that through our investment process we have determined are appropriate investments for our clients. Although this practice occurs infrequently, it creates a conflict of interest when it does occur. Our Code describes our fiduciary duty to act in the best interest of our clients and we have investment policies and procedures in place to support this fiduciary duty. Further, our adherence to a scientific process for determining allocation greatly reduces the potential for such a conflict. Certain securities overlap across

strategies which could potentially create an opportunity for us to favor one strategy over another. We believe that our firm's current asset under management is vastly insufficient to create sufficient market impact for such potential conflicts of interest to materialize. As our firm grows we will continually review and revise our policies should any such potential conflict require additional policies and management.

GCP advocates to all clients the visual evangelism of scientific diversification and a diversification centric orientation for client meetings, communications and prospect presentations.

Research Resources

Gsphere is our proprietary optimization and analytic platform for building and analyzing portfolios.

We believe this is a world class optimization Institutional RoboAdvisory platform and has many advanced features we use during portfolio construction and analysis such as:

Optimization Policies

Shrinkage (James / Stein Estimation)
 Custom Shrinkage Targets
 Correlation Calculation Options
 Multi-Sampling
 Sample Weighting
 Ability to Set the Calculation Dimension
 Risk and Return Forecast Importing
 Risk and Return manual forecasting
 Risk and Return forecast blending
 Risk and return estimation logging
 Position Constraints
 Global Constraints
 Risk & Return Estimation Floor
 Risk & return Estimation Ceiling
 Custom Hurdle Rate

Easy Saving & Retrieval of Policy Trees

Risk Definitions

System Overview

Diversification Optimization
 Diversification Visualization
 Diversification Measurement
 Client Portal
 Risk Profiling
 Unlimited Clients
 Unlimited Portfolios
 Max Portfolio size = 200
 Portfolio Entry by Allocation, Shares, Value
 Global Exchange Listed Products
 US Mutual Funds
 Indexes
 Symbol Lookup
 Custom Folders
 Investor and Colleague Sharing
 Website Embedding

Guest User Access for Lead Generation

Reporting & Analytics

Custom Branding
 3D pdf Generation
 Excel Export
 Profit & Loss Report
 Correlation Matrix Report
 Custom 3D Strategy Factsheets
 Interactive Gsphere Graphics
 Risk & Return Chart
 Positions Chart
 Return Table (Calendar or Trailing)
 Risk Table
 Diversificometers
 Diversification Source Chart
 Allocation Chart
 Performance Vs Benchmark
 Benchmark Statistics

Advanced Quantitative Data
Asset Performance Spark
charts
Systemic Risk Measurement

Custom Blended Benchmarks
Risk & return Bubble Chart
Upside & Downside Capture
Alpha, Beta, R2 & Yields

Dynamic Multi-period Portfolio
Assembly

Access to Research Page for logging and monitoring positions, creating watch lists and candidate sets, which are recyclable building blocks to streamline custom portfolio management.

World leading portfolio level backtesting featuring all combinations of policy trees additionally including fully automatic walk-forward out-of-sample multi-period backtesting. This includes your custom designated combinations of reoptimization and rebalancing for the most accurate and unbiased look back of any strategy or custom portfolio solution

Our security selection is a product of internal research, collaboration with clients, discretionary sector and industry factor models, quantitative, fundamental, valuation and return estimation models. Advisor clients may freely run their strategies on our custom branded robo-advisory platform.

GCP utilizes research produced by our sister company, Gravity Investments which produced various research products since 2000. GCP may assimilate research produced by academic journals and our network or industry thought leaders and academics if such research product can be validated and integrated in to our diversification centric process. Gravity is a tier one research partner with Cornell University's graduate MPS quantitative school.

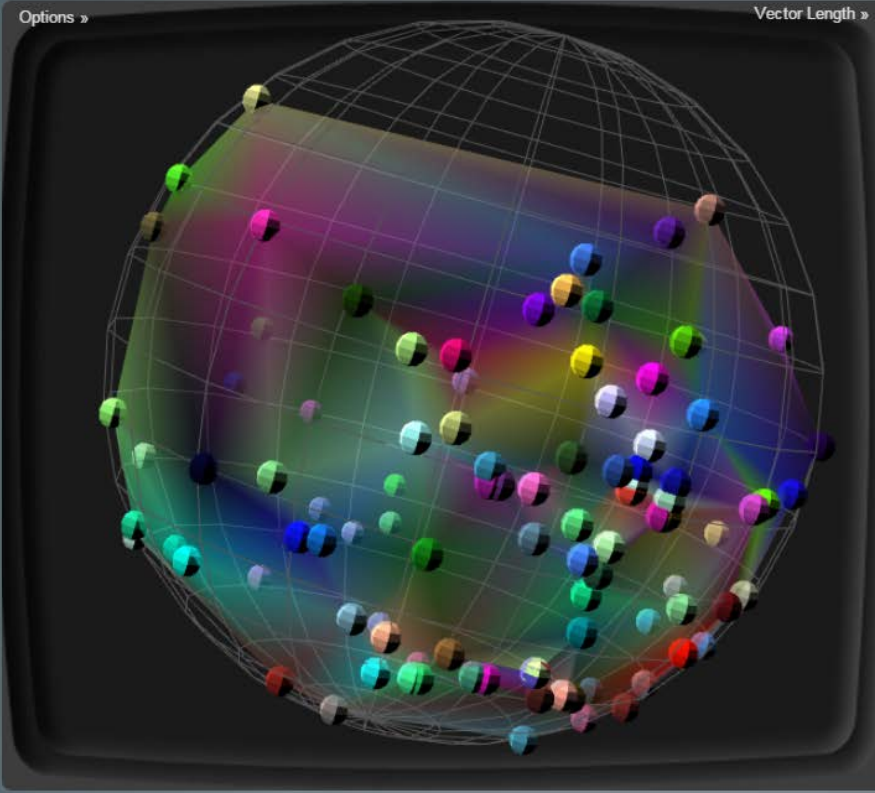
Access to the system is available to our sub advisory clients.

An example of the portfolio view page is below:

PORTFOLIO VISUALIZATION

Options »

Vector Length »



PORTFOLIO INFO

Name: GCP Fundaquant.

Creation Date: 06/16/2014 21:46:04
Edit this portfolio.



DIVERSICOMETERS

Total
(54.00 (Superabundant))



Systematic
(54.88%)

Non-Systematic
(57.16)



9

Disciplinary History

No principal or employee or independent contractor of Gravity Capital Partners has any disciplinary actions or adverse legal history with any securities or financial regulatory body.

10

Other Financial Industry Activities and Affiliations

All Principal Executive Officers are also affiliated with Gravity Investments, LLC, a worldwide leader in Diversification Intelligence, a leader in financial engineering, innovative investment products and technologies. Gravity Investments, LLC developed Gsphere, a patented RoboAdvisor platform technology used in the investment industry. Gsphere is currently the only method to precisely measure and quantify True Diversification® or create Diversification Weighting® of any given portfolio.

Servicing over 100 financial institutions and impacting tens of billions of dollars, Gsphere, is used to research, produce and promote diversification-based investment strategies, including Diversification Weighted® fund products.

Gravity Investments, LLC. has several patents, both issued and pending for diversification optimization, diversification visualization, diversification measurement, and diversification search.

Gravity Capital Partners, LLC. has no affiliations with broker dealers, fund families, insurance companies or fund consultants that create a conflict of interest through incentivizing our sales of their financial securities products.

John Osland and James Damschroder are the majority owner operators of both affiliated entities, namely Gravity Investments, LLC and Gravity Capital Partners, LLC. There are no other stock holders in Gravity Capital Partners. There are several minority stock holders in Gravity Investments though they have neither voting rights nor operational involvement and are hence wholly unrelated parties. These 2 entities are

highly symbiotic and synergistically related in the cross promotion of software from the unregulated software company and the wealth management professional services provisioned through the regulated entity. Mr. Osland and Mr. Damschroder's commercial activities routinely flow across both entities creating a potential conflict. Gravity Capital Partners accrues a royalty payable to Gravity Investments for the unique rights to Gravity Investments' intellectual property. This helps fortify a more traditional arm's length relationship mitigating the potential conflict.

11

Code of Ethic, Participation or Interest in Client Transactions and Personal Trading

GCP does not, as principal, buy securities for itself from or sell securities it owns to any client or as broker or agent effect securities transactions for compensation for any client. GCP allows employees to invest for their own accounts or have a financial interest in the same securities or other investments that the firm recommends for the portfolios of its clients, and may engage in transactions that are the same as or different than transactions recommended to or made for client portfolios creating a potential conflict. Such transactions are permitted if effected, pre-cleared and reported in compliance with GCP's policy on personal securities transactions.

Hence, GCP recognizes the fiduciary responsibility to place its clients' interests first and has established policies in this regard to avoid any potential conflicts of interest. Reports of personal transactions in

securities by GCP's personnel are reviewed by the firm's Designated Principal quarterly (or more frequently) if required mitigating this potential conflict.

GCP has developed and implemented a Code of Ethics that sets forth standards of conduct expected of GCP's advisory personnel. The Code of Ethics addresses potential conflicts of interest, among other things, personal trading, gifts, the prohibition against the use of inside information and other situations where there is a possibility for conflicts of interest. The Code of Ethics is designed to protect GCP's clients by deterring misconduct mitigating the potential conflict of interest. The Code educates personnel regarding the firm's expectations and laws governing their conduct, reminding personnel that they are in a position of trust and must act with complete propriety at all times, protect the reputation of GCP, guard against violation of the securities laws, and establish procedures for personnel to follow so that GCP may determine whether their personnel are complying with the firm's ethical principles. GCP will provide a copy of the Code to any client or prospective client upon request.

The principals of GCP own an affiliated, unregulated entity, Gravity Investments which may create a potential conflict with GCP. Gravity Investments may promote and license technology, consulting and other services to investments managers, including services and technologies principally designed to assist the investment firm in increasing assets under management. Gravity Investments is not directly compensated for increasing assets under management. However, there may be indirect incentives for assisting in the sales of such companies. This indirect incentive may create a potential conflict of interest to investors and other business partners of GCP. While there is no absolute safeguard against such a conflict, this conflict is addressed by strict adherence to the fiduciary interests of the partner and client. Additionally, Gravity Capital Partners accrues a royalty payable to Gravity Investments for the unique rights to Gravity Investments' intellectual property. This helps fortify a more traditional arm's length relationship mitigating the potential conflict.

Additionally, Gravity normally examines portfolio allocations from a systematic perspective, utilizing Gpshere, which utilizes proprietary diversification optimization as science. This technology creates a systematic process, which, when followed, reduces the opportunity for potential subjective biases interest.

12

Brokerage Practices

As we continue to develop the RoboAdvisor solution integrations with Broker Dealers it' becoming critically important that we strongly advise clients to inquire as to our preferences among Broker Dealers for production availability, costs, technology and integrations.

Currently we work primarily with Interactive Brokers and Finfo. GCP has done extensive research to ensure both brokers are among the most respected firms within their industry.

GCP works with Broker Dealers that vigorously use technology to achieve best execution and other value added feature for our clients.

GCP has authority to supervise and direct on an ongoing basis the investments of the Adviser's client. In some instances, GCP is authorized, in its discretion and without prior consultation with the Adviser to: (1) buy, sell, exchange and otherwise trade any

stocks, bonds or other securities or assets and (2) determine the amount of securities to be bought or sold and (3) place orders with the Adviser's Custodian. In other instances, GCP will collaborate with the adviser on the proposed portfolios and any rebalances. In these situations, the adviser has the final approval of the portfolio design for the sub-advisory relationship and GCP does not currently then hold regulatory discretion. GCP's fiduciary obligation is to the model portfolio or investment strategy.

13

Review of Client Models

GCP's fiduciary obligation is to the model portfolio or investment strategy.

Advisory clients are urged to formally notify the GCP of any changes in Model Objectives pursuant to their retail accounts. Through our RIA clients in the RoboAdvisory product GCP submits orders that adhere to advisor's strategies for retail accounts.

GCP does not routinely provide performance reporting.

While the underlying securities within the investment supervisory services are monitored, the portfolios are reviewed on a periodic basis. These reviews will be made and a summation report will be provided to the Portfolio Manager and Chief Compliance Officer of GCP. These reviews entail contacting our clients to ensure we are being properly notified of material changes to any accounts effected by the GCP systems. Additionally, we ensure the models are working as expected and no market driven variables have required GCP to make changes to our model to continue to provide the expected results based on the strategies chosen by the client. In this case we are proactive to ensure GCP systems are operating as designed and our clients are communicating changes to client needs so we can decide if a new model should be presented to the RIA for consideration.

While this isn't a requirement it adheres to our mission statement to improve the investing experience through our institutional roboadvisory platform technology resulting in improved investor confidence helping all market participants.

14

Client Referrals and Other Compensation

GCP has no client referral or other client based referral compensation relationships. GCP however does compensate third party solicitors, company contractors, business partners for marketing our sub advisory and consulting services. However, these compensated marketing personnel are not engaged in coded investment work for GCP. GCP does not provide any advisory services to entities that are not contracted commercial clients, so there is little potential for conflicts of interest resulting from quid pro quo relationships.

We are non conflicted and unbiased as GCP receives no compensation beyond AUM based sub advisory fees or consulting fees.

15

Custody

As we continue to develop the RoboAdvisory integrations with custodians it is becoming critically important so we strongly advise clients to inquire as to our preferences among custodians for production availability, costs, technology and integrations.

As we continue to develop the RoboAdvisory integrations with custodians it is becoming critically important so we strongly advise clients to inquire as to our preferences among custodians for production availability, costs, technology and integrations.

GCP inherits the existing custody relationship(s) of our clients. GCP is custody agnostic except for our new relationship with Interactive Brokers (though we do not receive any inducements from them) which is widely regarded as the premier, online, global platform for customers as it relates to cost, performance, and security safety.

We do not maintain custody of client assets, however; we have researched and chosen IBKR for their Barron's and other awards as the top self-clearing, online, global broker-dealer.

Through our connected technology we are willing to work with any custodian of choice by our clients. Through cost and performance analysis, which we provide all new clients, we have found value added in switching to IBKR. This is knowledge we pass on to clients, before moving forward based on their preference. Again, while not required to do this it fits into our mission to educate investors so they can make the best fiduciary decisions for their clients.

We otherwise have no affiliated or preferred custodians.

16

Investment Discretion

We provide portfolio management services on a discretionary and non-discretionary basis to the model portfolio per se. Each client may designate a particular and/or custom set of constraints and other processes in concert with the stated objectives of a portfolio. GCP has authority to manage these portfolios within that framework and allows for periodic revision of such policies. **Advisor clients may freely run their strategies on our custom branded roboadvisory platform where they retain discretion and the fiduciary responsibility to their clientele.**

17

Voting Client Securities

GCP will not have or accept authority to exercise voting power with respect to client securities.

18

Financial Information

GCP has no materially adverse financial or legal conditions which would impair our ability to meet our contractual or fiduciary commitments to our clients.

19

State Regulation

Principal Executive Officers are James Damschroder and John Osland. Mr. Osland is not engaged in coded investment management advice. Mr. Damschroder is the Chief Investment Officer.

Mr. Osland has a BA cum laude with departmental distinction in economics and accounting along with a MBA in Finance each from leading academic institutions. Mr. Osland has 35 years of senior executive expertise across Fortune 500 technology entities and rapidly scaling technology and science based venture businesses.

Mr. Damschroder has a BA in Finance from the University of Colorado. Mr. Damschroder is the inventor of our patented and patent pending technologies with over 18 years of investment expertise. James is considered a renowned industry expert on the full spectrum science of portfolio diversification.

All Principal Executive Officers are also affiliated with Gravity Investments, LLC, a worldwide leader in Diversification Intelligence, a leader in financial engineering, innovative investment products and technologies. Gravity Investments, LLC developed Gsphere, a patented software program used in the investment industry. Gsphere is currently the only method to precisely measure and quantify True Diversification® or create Diversification Weighting® of any given portfolio.

Servicing over 100 financial institutions and impacting tens of billions of dollars, Gsphere, is used to research, produce and promote True Diversification®-based investment strategies, including Diversification Weighted® fund or portfolio products. Gravity Investments has several patents, both issued and pending for diversification optimization, diversification visualization, diversification measurement, and diversification search. At Gravity, we believe that superior technology and superior investment performance are related.

The Gravity Capital Partner Principals work intimately with Gravity Investments, generally in a management capacity, specifically, in that James Damschroder is the product owner of the Gsphere system. In the capacity of the Product Owner, James focuses, architects, designs, leads and integrates the many dimensions of desired investment strategies, policies, inventions and operational efficiencies deemed best to improve Gsphere.

GCP has no affiliations with broker dealers, fund families, insurance companies, fund consultants or custodians (other than Interactive Brokers though we do not receive any inducements from them) that create a conflict of interest.

No Gravity Principal or Gravity Supervisory person has been found liable, implicated or otherwise involved in any scenarios involving; (a) an investment or an investment-related business or activity; (b) fraud, false statement(s), or omissions; (c) theft, embezzlement, or other wrongful taking of property; (d) bribery, forgery, counterfeiting, or extortion; or (e) dishonest, unfair, or unethical practices.

Neither GCP nor its Principles collect any incentives from third party financial product firms. GCP does not receive referral fees of any kind for any investment product recommended in any model.

Voluntary Disclosure of Personal Investments

The Principles of the firm have no conflicting commercial activities or investments beyond the affiliated Gravity family of companies.

Other Information

Class Actions and Other Legal Proceedings

We do not participate in legal proceedings, including class actions, on behalf of our clients. However, we will support our advisory clients in their disputes or potential disputes.

Privacy Notice

Our Promise to You

You share both personal and financial information with us. Your privacy is important to us, and we are dedicated to safeguarding your personal and financial information.

Information Provided

In the normal course of doing business, we typically obtain the following non-public personal information: Personal information regarding your identity such as name, address and social security number; Information regarding securities transactions effected by us; and Financial information such as net-worth, assets, income, financial account information, bank account information and account balances

How We Manage and Protect Your Personal Information

We do not sell information about you to third parties, nor is it our practice to disclose such information to third parties unless requested or permitted to do so by you or your

representative or, if necessary, in order to process a transaction, service an account or as permitted by law.

We may, however, share information about you with our affiliates. Additionally, we may share information with outside companies that perform administrative services for us. However, our arrangements with these service providers require them to treat your information as confidential.

In order to protect your personal information, we maintain physical, electronic and procedural safeguards to protect your personal information. Our Privacy Policy restricts the use of your information and requires that it be held in strict confidence.

Client Notifications

We are required by law to annually provide a notice describing our Privacy Policy. In addition, we will inform you promptly if there are changes to our policy. Please do not hesitate to contact us with questions about this notice.

Part 2B of Form ADV: Brochure Supplement

IARD: 154006

James Damschroder

Founder & CIO



Gravity Investments, LLC and Gravity Capital Partners, LLC.

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View my profile on **LinkedIn**

This brochure supplement provides information about the qualifications and business practices of **Mr. James Damschroder** c/o Gravity Capital Partners, LLC. ("GCP") that supplements our firm's brochure which you should have received. If you have any questions about the contents of this brochure supplement, please contact us at 970 GRAVITY or info@gravityinvestments.com.

The information in this brochure supplement has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Additional information about **Mr. James Damschroder** c/o GCP also is available on the SEC's website at www.adviserinfo.sec.gov.

Please refer to item Part 2A Item #19 'state regulation' of Form ADV which details all pertinent background on Mr. Damschroder pursuant to Part 2B of Form ADV.

"Registration" does not imply a certain level of skill or training.