

# CHRONIM INVESTMENTS, INC.

PART 2A AND 2B OF FORM ADV: Firm Brochure and Brochure Supplements

## CHRONIM INVESTMENTS, INC.

DBA SNIDER ADVISORS

AND

DBA CHRISILIS

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February 1, 2017

This brochure provides information about the qualifications and business practices of Chronim Investments, Inc. If you have any questions about the contents of this brochure, please contact us at 214-220-0055 or [support@snideradvisors.com](mailto:support@snideradvisors.com) or [support@chrisilis.com](mailto:support@chrisilis.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission.

Additional information about Chronim Investments is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search this site by a unique identifying number, known as a CRD number. Our firm's CRD number is 120943. Registration does not imply a certain level of skill or training.

## ITEM 2 MATERIAL CHANGES

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### Material Changes since the last annual amendment (03/15/2016)

- Updated address to new business location: 100 Decker Court, Suite 120, Irving TX, 75062
- Updated owners to Jesse Anderson (55%) and Tyler Curtis (45%)
- Switch from state regulated to SEC registration
- Remove former owners, Kimberly Snider and James Hughes
- Remove South Carolina branch location

### Full Brochure Available

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us via email at [support@snideradvisors.com](mailto:support@snideradvisors.com) or [support@chrisilis.com](mailto:support@chrisilis.com). You can also visit our websites at [www.snideradvisors.com](http://www.snideradvisors.com) or [www.chrisilis.com](http://www.chrisilis.com).

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## ITEM 4 ADVISORY BUSINESS

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## Firm Description

Chronim Investments, Inc. (Chronim) is an SEC registered investment adviser with its principal place of business located in Texas. Chronim Investments, Inc. began conducting business in 2002. We conduct all investment business under the names Snider Advisors and Chrisilis.

Chronim offers educational and investment management products tailored to meet our clients' needs. Snider Advisors investment management and consulting services are built to assist our clients in implementing the Snider Investment Method. The Snider Method is a systematic strategy with specifically defined steps to invest for cash flow. It uses a combination of stock, options, and cash, along with specific techniques applied in a specific sequence to achieve our cash flow objectives. The Snider Method uses our proprietary stock selection tool "Lattco" to select stocks that fit within the parameters of the Snider Investment Method. In addition to Lattco, we also offer two additional tiers of the software to assist clients with their implementation of the Snider Investment Method. Lattco PRO assists clients with the bookkeeping necessary to implement the strategy. Lattco AutoPilot walks clients through every trade in their investment account, recommends their trades according to the Snider Investment Method, sends their trades directly to the broker, and updates all their records. In order to properly implement the Snider Method, clients must attend our Snider Investment Method seminar. It is not necessary to attend our seminar if you are seeking Asset Management services. Consulting services and Lattco are optional after successfully completing the Snider Investment Method seminar.

Chrisilis is an online investment advisor that recommends, implements, and provides on-going investment management of low-cost, Exchange Traded Fund (ETF) portfolios on a discretionary basis.

Should a client have certain restrictions on specific stock transactions, we can assist them in implementing the strategy with those restrictions accounted for. Ultimately, the clients' suitability for the Snider Investment Method is required to be determined prior to the client attending our educational seminar.

Chronim does not participate in any wrap fee programs.

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## Principal Owners

Listed below are the firm's principal shareholders. These are the individuals and/or entities controlling 25% or more of this company.

- Jesse G. Anderson
- Tyler Curtis

## Types of Advisory Services

### SNIDER ADVISORS: SNIDER METHOD CONSULTING SERVICES

Our firm provides continuous advice to a client regarding the investment of client funds based on the Snider Method. Level I Consulting consists of periodic notices of events which may affect the trades called for by the method, answering questions from clients regarding the method in general or specific to their accounts, and assistance placing trades. Level I may also include placing the trades on the client's behalf (Vacation Trade). We assume discretionary authority over the account for a limited period of time when a client makes such a request. Discretionary authority requires a Limited Trading Authorization agreement on file for each client account.

We gather data regarding a client's particular circumstances to determine if the Snider Method is a suitable investment. We gather information on the client's individual objectives, time horizons, risk tolerance, and liquidity needs. As appropriate, we also review and discuss a client's prior investment history, as well as family composition and background.

Our investment recommendations are not limited to any specific product or service offered by a broker-dealer or insurance company. The Snider Method investments include:

- Exchange-listed securities
- Options contracts on securities
- United States governmental securities
- Exchange Traded Funds (ETFs)

Because some types of investments involve certain additional degrees of risk, they will only be implemented/recommended when consistent with the client's stated investment objectives, tolerance for risk, liquidity, and suitability.

### SNIDER ADVISORS: INDIVIDUAL ASSET MANAGEMENT

Our firm provides continuous regular asset management of client funds based on the Snider Method. We gather data regarding a client's particular circumstances to determine if the Snider Method is a suitable investment. We gather information on the client's individual objectives, time horizons, risk tolerance, and liquidity needs. As appropriate, we also review and discuss a client's prior investment history, as well as family composition and background.

We manage these advisory accounts on a discretionary basis following the Snider Method. The method considers factors such as liquidity needs, income objectives, risk tolerances, and tax considerations.

Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors. Once the client's portfolio has been established, we perform the trades specified by the method each month.

Our investment recommendations are not limited to any specific product or service offered by a broker-dealer or insurance company and will generally include advice regarding the following securities:

- Exchange-listed securities
- Options contracts on securities
- United States governmental securities
- Exchange Traded Funds (ETFs)

Because some types of investments involve certain additional degrees of risk, they will only be implemented/recommended when consistent with the client's stated investment objectives, tolerance for risk, liquidity and suitability.

Snider Advisors does not participate in any wrap fee programs.

### **SNIDER ADVISORS: SEMINARS**

Snider Advisors conducts group educational workshops where clients learn the Snider Investment Method. The Snider Method is a long-term strategy designed to create income from your portfolio. It uses a combination of stock, options and cash, along with specific techniques applied in a specific sequence, to achieve these goals. We also offer an online version of the workshop.

### **SNIDER ADVISORS: FINANCIAL PLANNING**

We provide financial planning services. Financial planning services vary based on the client's objectives and questions. The financial advisor may help the client with specific needs or perform an overall analysis. Clients who seek an overall analysis will receive a comprehensive evaluation of their current and future financial state by using client-furnished information and data. Specific financial planning needs may include but are not limited to investment advice, insurance consultations, benefits analysis, retirement planning, college education planning, tax planning, and estate planning.

Through the financial planning process, all questions, information, and analysis are considered as they impact and are impacted by the entire financial and life situation of the client. The financial advisor will make actionable recommendations for the client based on the results of the data gathering, research, and financial planning best practices. Clients pay an hourly fee for the time it takes to meet, research, and prepare recommendations.

Financial planning recommendations are not limited to any specific product or service offered by a broker-dealer or insurance company. Our advisors are licensed to sell insurance products. Advisors are not compensated directly for the sale of any investment or insurance products; however, the firm does receive commissions and may indirectly compensate the advisors based on the volume of sales. The incentives offered by insurance companies inherently cause a conflict of interest.

All financial plans are dynamic and should be revisited periodically to track progress and make changes as necessary. The client is responsible for initiating subsequent meetings and activities and is under no obligation to implement the advisors recommendations. If the client chooses to implement the recommendations provided, they are under no obligation to execute these transactions through Snider Advisors.

## **SNIDER ADVISORS: SECURITIES RATING SERVICES**

Snider Advisors provides a securities rating service called Lattco. This service is used to trade securities in the Snider Method. We exclude securities from consideration based on fundamental data, credit scoring methods, and liquidity measures (for the stock and the options on the stock).

Included securities are then ranked based on price, volatility, liquidity, and sector factors and presented to the client as investment recommendations. Subsequent investment recommendations regarding a particular security are determined by the algorithms of the Snider Method, which do not generally consider these factors after the initial Lattco recommendation.

Lattco PRO, an enhanced version of the rating service, includes a recordkeeping system for the investment strategy. It organizes clients' account and trading data to aid clients in the accurate implementation of our strategy.

## **SNIDER ADVISORS: NON-DISCRETIONARY MANAGEMENT**

Lattco AutoPilot includes all the services of the securities rating services as well as specific trade recommendations. It recommends trades according to the Snider Investment Method and sends trades directly to the broker after confirmation from the client. Assets utilizing Lattco AutoPilot are managed on a non-discretionary basis with clients making the final decision to place each trade recommendation.

We gather data regarding a client's particular circumstances to determine if the Snider Method is a suitable investment. We gather information on the client's individual objectives, time horizons, risk tolerance, and liquidity needs. As appropriate, we also review and discuss a client's prior investment history, as well as family composition and background.

Our investment recommendations are not limited to any specific product or service offered by a broker-dealer or insurance company. The Snider Method investments include:

- Exchange-listed securities
- Options contracts on securities
- United States governmental securities
- Exchange Traded Funds (ETFs)

Because some types of investments involve certain additional degrees of risk, they will only be implemented/recommended when consistent with the client's stated investment objectives, tolerance for risk, liquidity, and suitability.

## CHRISILIS: DISCRETIONARY INVESTMENT MANAGEMENT

Chrisilis provides continuous regular asset management of client funds based on modern portfolio theory. We implement diversified portfolios with ETF investments tracking stocks, bonds, emerging markets, real estate, and commodity indexes. We gather data regarding a client's particular circumstances to determine if the portfolio is a suitable investment. We gather information on the client's individual objectives, time horizons, risk tolerance, and liquidity needs. As appropriate, we also review and discuss a client's prior investment history, as well as family composition and background.

We manage these advisory accounts on a discretionary basis. The portfolio recommendations consider factors such as liquidity needs, income objectives, risk tolerances, and tax considerations.

Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors. Once the client's portfolio has been established, we perform trades to reinvest fund distributions and rebalance fund allocations back to targets when portfolios become out of line.

Our investment recommendations are not limited to any specific product or service offered by a broker-dealer or insurance company and will generally include advice regarding the following securities:

- Exchange Traded Funds (ETFs)

Because some types of investments involve certain additional degrees of risk, they will only be implemented/recommended when consistent with the client's stated investment objectives, tolerance for risk, liquidity and suitability.

Chrisilis does not participate in any wrap fee programs.

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### Amount of Managed Assets

As of 12/31/2016, Chronim Investments was actively managing \$66,557,060.67 of clients' assets for 245 accounts on a discretionary basis. We manage \$48,674,007.77 on a non-discretionary basis.



## ITEM 5 FEES AND COMPENSATION

### **SNIDER ADVISORS ASSET MANAGEMENT FEES**

The annualized fee for Asset Management Services will be charged as a percentage of assets under management, according to the following schedule:

<i>Assets Under Management</i>	<i>Annual Fee</i>
Less than \$500,000	2.50%
\$500,001 - \$2,000,000	2.00%
\$2,000,001 - \$5,000,000	1.50%
More than \$5,000,001	1.00%

Fees above 2% may be considered excessive and clients may be able to obtain the same or similar services for a lower amount.

The minimum asset value for Asset Management Services is \$200,000. These fees are billed on a monthly basis, in arrears. The fees are based upon the asset value as of the end of the prior month as it appears on the brokerage statement. Clients can either have the fee deducted from their accounts by the broker, or charged to a credit card. Clients receive an itemized invoice at the same time any fee is deducted from their account or charged to their credit card.

The fee for each month for all the accounts owned by one individual or one trust is subject to a maximum, which is the fee for the smallest asset value for the next level. For example, accounts under \$500,000 will pay 1/12 of 2.5%, but not more than 1/12 of 2.0% of \$500,000. All the accounts owned by a client, spouse, and minor children are aggregated to determine the fee percentage. Fees are prorated by days in any period in which the services terminate. Upon termination, any unpaid fees are due.

Snider Advisors offers a rebate against asset management fees for clients who purchase the Snider Investment Method™ course. If a client attends our Snider Investment Method workshop and then decides to use our Discretionary Investment Management, we will rebate the client up to 100% of the workshop cost. The client's monthly fee is reduced by \$200 each month until the full amount of the rebate is issued. Snider Advisors reserves the right to negotiate individual fee agreements. Special consideration is given to client's extended family members in order to group assets to obtain a lower fee percentage. Asset Management clients are entitled to consulting and security rating services at no additional charge.

### **SNIDER ADVISORS CONSULTING**

The monthly fee for Snider Method Level I Consulting Services is \$10 charged at the beginning of the month in advance. No additional consulting fees are charged to Asset Management clients. Clients can either have the fee deducted from their accounts by the broker, or charged to a credit card. Clients receive an itemized invoice at the same time any fee is deducted from their account or charged to their credit card. There is no charge for partial-month usage. Snider Advisors reserves the right to negotiate individual fee agreements.

### **SNIDER ADVISORS SECURITIES RATINGS SERVICES FEES**



The fee for Lattco is \$30 in any month in which the client uses the service, regardless of how many times the service is used during the month. All fees other than the \$10 fee are charged at the end of the month.

Lattco PRO is premier bookkeeping software that is offered to our clients for an additional fee. The fee for Lattco PRO is \$8 per position per month when activity is downloaded and includes the cost of searching for new positions (There is not an additional \$30 charge as in the original Lattco). The maximum fee for Lattco PRO in any one month is \$250. Snider Advisors reserves the right to negotiate individual fee agreements. Fees can be discounted or waived for clients using the products for the first time.

There is no minimum asset value for Snider Method Consulting Services since clients are trading their own accounts. However, we recommend a minimum investment of \$25,000. Clients can either have the fee deducted from their accounts by the broker, or charged to a credit card. Clients receive an itemized invoice at the same time any fee is deducted from their account or charged to their credit card. There is no charge for partial-month usage. Snider Advisors reserves the right to negotiate individual fee agreements.

### **SNIDER ADVISORS NON-DISCRETIONARY MANAGEMENT**

The annualized fee for Lattco AutoPilot non-discretionary management services will be charged as a percentage of assets under management, according to the following schedule:

<i><u>Assets Under Management</u></i>	<i><u>Annual Fee</u></i>
Less than \$1,500,000	0.75%
Greater than \$1,500,000	0.50%

The fee for each month for all the accounts owned by one individual or one trust is subject to a maximum, which is the fee for the smallest asset value for the next level. For example, accounts under \$1,500,000 will pay 1/12 of 0.75%, but not more than 1/12 of 0.50% of \$1,500,000. All the accounts owned by a client, spouse, and minor children are aggregated to determine the fee percentage. Fees are prorated by days in any period in which the services terminate. Upon termination, any unpaid fees are due.

There is no minimum asset value for Snider Method Consulting Services since clients are trading their own accounts. However, we recommend a minimum investment of \$25,000. Clients can either have the fee deducted from their accounts by the broker, or charged to a credit card. Clients receive an itemized invoice at the same time any fee is deducted from their account or charged to their credit card. There is no charge for partial-month usage. Snider Advisors reserves the right to negotiate individual fee agreements.

### **SNIDER ADVISORS SEMINAR FEES**

The Snider Investment Method Live workshop is \$2,000. The Snider Investment Method Online Course is \$299 per month for 6 months (Total: \$1,794). Any discounts and/or promotional offers on any of our services are offered at our discretion. We may also reduce or waive fees for workshop attendance for family and friends of our employees or certain vendors and associates of Snider Advisors.

There is a deposit payable when the client first registers for the class. The balance is due the day before the workshop. You may request a refund for any reason within 90 days of attending a seminar. Deposits are fully refundable for any reason. Snider Advisors reserves the right to negotiate individual fee agreements and/or run fee discounts or limited time specials on pricing.

### **SNIDER ADVISORS FINANCIAL PLANNING FEES**

Snider Advisors' Financial Planning fee will be determined based on the nature of the services being provided and the complexity of each client's circumstances. All fees are agreed upon prior to entering into a contract with any client.

Our Financial Planning fees are calculated and charged on an hourly basis at \$250 per hour. Although the length of time it will take to provide a Financial Plan will depend on each client's personal situation, we will provide an estimate for the total hours at the start of the advisory relationship. The client will be billed in arrears based on actual hours provided. There is no charge for partial plan delivery. No fees are earned until the final product is delivered and approved by the client.

### **CHRISILIS ASSET MANAGEMENT FEES**

Chrisilis does not impose a minimum asset value for asset management services. The annualized fee for Chrisilis Investment Management Services will be charged .5% (50 basis points) of assets under management. Clients can either have the fee deducted from their accounts by the broker, or charged to a credit card. Clients receive an itemized invoice at the same time any fee is deducted from their account or charged to their credit card. There is no charge for partial-month usage. Snider Advisors reserves the right to negotiate individual fee agreements.

### **INSURANCE PRODUCT SALES**

Certain employees of our firm are licensed to sell insurance. We typically will advise our clients on and provide Long-Term Care, Life, MediGap, Health and Disability Insurance products as agents of insurance companies. Snider Advisors as a company receives a commission from the sale of these policies. The employee does not receive any part of the commission. However, the volume of sales any employee achieves will likely have an impact on other discretionary incentive compensation programs, such as quarterly bonuses.

The incentives offered by insurance companies inherently cause a conflict of interest. We recognize this conflict and provide our clients with choices between several insurance companies to ensure that their

needs are the primary focus. We explain the benefits and drawbacks of each product and allow the client to make the final decision on which insurance product or company to select.

Clients have the option to purchase insurance products from a different insurance broker or agent.

## **GENERAL INFORMATION**

*Termination of the Advisory Relationship:* A client agreement may be canceled at any time, by either party, for any reason upon written notice. As disclosed above, the only fee paid in advance is the \$10 monthly consulting fee. Upon termination, a full refund can be requested for any advanced payment. At the termination of any other services, the accrued, unpaid fees are due and payable. In calculating asset management fees, we will pro rate the final fee according to the number of days remaining in the billing period. The advisory relationship will automatically terminate 14 days after attending a seminar unless additional services are requested.

*ETF Fees:* All fees paid to Snider Advisors and Chrisilis for investment advisory services are separate and distinct from the fees and expenses charged by ETFs to their shareholders. These fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee. If the fund also imposes sales charges, a client may pay an initial or deferred sales charge. A client could invest in an ETF directly, without our services. In that case, the client would not receive the services provided by our firm which are designed, among other things, to assist the client in determining which ETFs are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the ETFs and our fees to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

*Additional Fees and Expenses:* In addition to our advisory fees, clients are also responsible for the fees and expenses charged by custodians and imposed by broker dealers, including, but not limited to, any transaction charges imposed by a broker dealer or custodian. Please refer to the "Brokerage Practices" section (Item 12) of this Form ADV for additional information.

*Grandfathering of Minimum Account Requirements:* Pre-existing advisory clients are subject to Snider Advisors' minimum account requirements and advisory fees in effect at the time the client entered into the advisory relationship. Therefore, our firm's minimum account requirements will differ among clients.

*ERISA Accounts:* Chronim is deemed to be a fiduciary to advisory clients that are employee benefit plans or individual retirement accounts (IRAs) pursuant to the Employee Retirement Income and Securities Act ("ERISA"). As such, our firm is subject to specific duties and obligations under ERISA and the Internal Revenue Code that include among other things, restrictions concerning certain forms of compensation. To avoid engaging in prohibited transactions, Chronim may only charge fees for investment advice about products for which our firm and/or our related persons do not receive any commissions or 12b-1 fees, or conversely, investment advice about products for which our firm and/or our related persons receive commissions or 12b-1 fees, however, only when such fees are used to offset Chronim's advisory fees.

*Advisory Fees in General:* Clients should note that similar advisory services may (or may not) be available from other registered (or unregistered) investment advisers for similar or lower fees. Also, registration does not imply a certain level of skill or training.

*Limited Prepayment of Fees:* Under no circumstances do we require or solicit payment of fees in excess of \$1,200 more than six months in advance of services rendered.

*Negotiation of Fees:* Chronim reserves the right to negotiate individual fee agreements and/or run fee discounts or limited time specials on pricing.

Clients can terminate any contract with no penalty at any time. \*Lower fees for comparable services may be available from other sources.

## ITEM 6 PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

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Chronim does not charge performance-based fees.

## ITEM 7 TYPES OF CLIENTS

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Chronim provides advisory services to the following types of clients:

- Individuals (other than high net worth individuals)
- Corporations, partnerships and other entities
- High net worth individuals

As previously disclosed in Item 5, our firm has established certain initial minimum account requirements, based on the nature of the service(s) being provided. For a more detailed understanding of those requirements, please review the disclosures provided in each applicable service.

## ITEM 8 METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

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### Methods of Analysis

We use the following methods of analysis in formulating our investment advice and/or managing client assets:

*Fundamental Analysis.* The Snider Method attempts to identify fundamentally sound companies with high price volatility. To do this, we use credit scoring techniques which use fundamental data.

This fundamental analysis does not attempt to anticipate market movements. This presents a potential risk, as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the stock.

*Asset Allocation.* Our proprietary stock screener, Lattco, is able to diversify positions among various industry sectors. The Snider Method attempts to balance cash and positions in securities to produce stable income.

A risk of asset allocation is that the client may not participate in sharp increases in a particular security, industry or market sector. Another risk is that the ratio of securities, fixed income, and cash will change over time due to stock and market movements and, if not corrected, will no longer be appropriate for the client's goals.

*Risks for all forms of analysis.* Our securities analysis methods rely on the assumption that the companies whose securities we purchase and sell, the rating agencies that review these securities, and other publicly-available sources of information about these securities, are providing accurate and unbiased data. While we are alert to indications that data may be incorrect, there is always a risk that our analysis may be compromised by inaccurate or misleading information.

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### Snider Advisors Investment Strategies

Snider Advisors uses the Snider Method investment strategy. This strategy combines stock purchases, option sales, and cash balances with the objective of providing current income.

*Long-term purchases.* We purchase securities we may potentially hold for long periods of time. The risks of holding securities for long periods of time is the stock may decline in price or go bankrupt.

*Short-term purchases.* We purchase securities we may potentially hold for short periods of time. The risk of holding securities for short periods of time and replacing them with other stocks is higher transactions costs.

*Margin transactions.* The Snider Method occasionally requires you to purchase stocks with money borrowed from your broker. This allows you to purchase more stock than you would be able to with your available cash. You must pay margin interest on the amount of money borrowed from your broker.

A risk in margin trading is that, in volatile markets, securities' prices can fall very quickly. If the value of the securities in your account minus what you owe the broker falls below a certain level, the broker will issue a "margin call", and you will be required to sell your position in the security purchased on margin or add more cash to the account. In some circumstances, you may lose more money than you originally invested.

*Option writing.* We use options as part of our investment strategy. An option is a contract that gives the buyer the right, but not the obligation, to buy or sell an asset (such as a share of stock) at a specific price on or before a certain date. An option, just like a stock or bond, is a security. An option is also a derivative because it derives its value from an underlying asset.

The two types of options are calls and puts:

- A call gives the buyer the right to buy an asset at a certain price within a specific period of time in exchange for a premium paid to the seller. We typically sell calls as part of our investment strategy.
- A put gives the buyer the right to sell an asset at a certain price within a specific period of time in exchange for a premium paid to the seller. We typically sell puts as part of our investment strategy.

We use covered calls and cash-secured puts, in which we sell options on securities we own (or have earmarked cash to buy). In this strategy, you receive a fee for making the option available, and the person purchasing the option has the right to buy the security from you at an agreed-upon price. When calls are exercised, clients are forced to sell their security at the strike price of the call option. This is likely below the market value of the security. When a put is assigned, clients are forced to purchase the security at the strike price of the put option. This is likely at a price above the market value of the security.

Some of the risks of this strategy are: 1) We own the stock, so if the price declines we have an unrealized loss. 2) We give away some of the potential price increase because we agreed to sell the security at the option strike price. 3) We own the stock, so if the company goes bankrupt we have a realized loss.

## **Chrisilis Investment Strategies**

Chrisilis uses various ETFs to create a diversified portfolio of multiple asset classes. Based off the suitability and risk tolerances of the client, we recommend balanced portfolios with investments in stock, bond, emerging market, real estate, and commodity funds.

*Long-term purchases.* We purchase securities we may potentially hold for long periods of time. The risk of holding securities for long periods of time is the fund may decline in price.

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## **Risk of Loss**

Securities investments are not guaranteed and you may lose money on your investments. Investing in securities involves risk of loss that clients should be prepared to bear. We ask that you work with us to help us understand your tolerance for risk.

Each of the types of securities in which we invest present unique risks:

Exchange-Listed Securities are exposed to loss of principal, risk of market declines, economic risks, and specific company risk that can include fraud or unfavorable events unique to only the company.

Exchange Traded Funds (ETFs) are exposed to loss of principal, risk of market declines, economic risks, and the same risks of owning the underlying securities held in the fund.

Exchange-Listed Options are only sold in our investment strategies. The risks of selling a call includes the limited upside of price appreciation in exchange for a premium. When selling a put we risk purchasing additional shares at a strike price that may be above the market price.

## ITEM 9 DISCIPLINARY INFORMATION

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### Legal and Disciplinary

Our firm and our management personnel have no reportable disciplinary events to disclose.

## ITEM 10 OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

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### Insurance Products

Certain employees of our firm are licensed to sell insurance. We typically will advise our clients on and provide Long-Term Care, Life, MediGap, Health and Disability Insurance products as agents of insurance companies. Chronim as a company receives a commission from the sale of these policies. The employee does not receive any part of the commission. However, the volume of sales any employee achieves will likely have an impact on other discretionary incentive compensation programs, such as quarterly bonuses.

The incentives offered by insurance companies inherently cause a conflict of interest. We recognize this conflict and provide our clients with choices between several insurance companies to ensure that their needs are the primary focus. We explain the benefits and drawbacks of each product and allow the client to make the final decision on which insurance product or company to select.

As mentioned previously, we do recommend and provide insurance based products on occasion to fill the needs of our current clients. The following individuals are licensed insurance representatives:

Jesse G. Anderson – Less than 5% of time allocated to insurance products and registered in Texas

Shelley Seagler – 35% of time spent on insurance solutions and registered in Texas



## ITEM 11 CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

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### Code of Ethics

Our firm has adopted a Code of Ethics which sets forth high ethical standards of business conduct that we require of our employees, including compliance with applicable federal securities laws.

Chronim and our personnel owe a duty of loyalty, fairness and good faith towards our clients, and have an obligation to adhere not only to the specific provisions of the Code of Ethics but to the general principles that guide the Code.

Our Code of Ethics includes policies and procedures for the review of quarterly securities transactions reports as well as initial and annual securities holdings reports that must be submitted by the firm's access persons. Among other things, our Code of Ethics also requires the prior approval of any acquisition of securities in a limited offering (e.g., private placement) or an initial public offering. Our code also provides for oversight, enforcement and recordkeeping provisions.

Chronim's Code of Ethics further includes the firm's policy prohibiting the use of material non-public information. While we do not believe that we have any particular access to non-public information, all employees are reminded that such information may not be used in a personal or professional capacity.

A copy of our Code of Ethics is available to our advisory clients and prospective clients. You may request a copy by email sent to [support@snideradvisors.com](mailto:support@snideradvisors.com) or [support@chrisilis.com](mailto:support@chrisilis.com), or by calling us at 214-220-0055.

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### Participation or Interest in Client Transactions

Chronim and individuals associated with our firm are prohibited from engaging in principal transactions and agency cross transactions.

Our Code of Ethics is designed to assure that the personal securities transactions, activities and interests of our employees will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts.

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### Personal Trading

Our employees are allowed to personally partake in our investment method with their personal assets. The Snider Method consists of trading once on a month on the first Monday following options expiration. Individuals associated with our firm may buy or sell for their personal accounts securities identical to or different from those recommended to our clients. In addition, any related person(s) may have an interest or position in securities which may also be recommended to a client.

It is the policy of our firm that no person employed by us may purchase or sell any security prior to a transaction(s) being implemented for an advisory account, thereby preventing such employee(s) from benefiting from transactions placed on behalf of advisory accounts.

To address this conflict of interest we have implemented a strict “black out” period on all securities trading for our employees to prevent them from trading prior to or during normal Snider Method trading periods. It includes our Trade Day and the 7 days preceding it (Trade Day is the Monday after option expiration). All employees have duplicate brokerage statements for personal accounts submitted to our Chief Compliance Officer on a monthly basis to ensure this “black out” period policy is followed.

Employees implementing Chrisilis portfolios and trade recommendations are not subject to our “black out” period. The ETFs used in these portfolios are not applicable to the Snider Method. As a result, trading these securities will not harm our Snider Advisors’ clients. Employee trades to implement, rebalance, and reinvest distributions in Chrisilis portfolios may be grouped with clients’ trades and executed simultaneously. Employees may have a reduced or waived Chrisilis asset management fee.

## ITEM 12 BROKERAGE PRACTICES

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### SELECTING BROKERAGE FIRMS

Chronim Investments does not have the authority to determine the broker/dealer to be used by our clients or commission rates paid by our clients without obtaining specific client consent. Also, we do not maintain custody of the assets that we manage or which we advise. However, we do suggest broker(s) to our clients and we do require managed accounts be opened at our recommended broker/dealer(s). We are independently owned and operated and not affiliated with any broker/dealer(s).

The factors we consider when recommending broker/dealer(s) to clients include financial strength, reputation, execution, pricing, research, and service. Commission rates for recommended broker(s) are generally considered discounted from customary retail rates, but may be higher or lower than those charged by other broker/dealer(s). We will only establish accounts with broker/dealer(s) that provide timely service and fair price. Technological support as well as platform expertise are major factors in recommending brokers to our clients.

We also make annual evaluations of alternative broker/dealers to ensure that our clients are receiving the value and service they deserve. If we were to find a better broker/dealer, we have no reservations of making a transition at that time.

As a fiduciary, Chronim has an obligation to act in the best interest of its clients and to place its clients' interests before its own. We have the responsibility to regularly and frequently evaluate our recommendations of broker/dealers to ensure our clients are getting the Best Execution available.

Depending on the type of client and their current investment strategy, we are likely to recommend one of three brokers: Interactive Brokers, TradeKing, and Schwab. Each firm has its own positives and negatives and may not be appropriate for all types of clients and trading.

Snider Advisors may refer clients to the unaffiliated broker-dealer, TradeKing. As a result of this arrangement, TradeKing will pay Snider Advisors a flat referral fee if the clients fund an account with them. The fee is not contingent on any other activity such as total assets or trading activity. Clients are under no obligation to act upon any recommendations of Snider Advisors or to effect any transactions through TradeKing. While we endeavor at all times to put the interest of our clients first as part of our fiduciary duty, the possibility of receiving incentive awards creates a conflict of interest, and may affect the judgment of these individuals when making recommendations. A potential conflict of interest may arise between the client's interest in obtaining best price and execution and Snider's interest in receiving future referral fees. To mitigate this conflict, clients have the option to open accounts through other unaffiliated broker-dealers Snider Advisors has established for this purpose.

Snider Advisors' Discretionary Investment Management clients must open an account at Interactive Brokers LLC. Chrisilis' Discretionary Investment Management clients must open an account at Schwab. We do not have the technological and operational infrastructure to accommodate multiple investment strategies trading through different broker-dealers. We believe each firm is best for their respective groups of clients based off the previously mentioned selection criteria and trading activity. We receive no special research or services from our recommended brokers.

Client transactions generally will be made independently, unless we decide to purchase or sell the same securities for several clients at approximately the same time. We may (but are not obligated to) combine such orders to obtain best execution, better commission rates, or to allocate equitably among our clients differences in prices, commissions, or other transaction costs that might have been obtained if the orders been placed independently. Under this procedure, transactions will generally be averaged as to price and allocated among our clients pro rata to the purchase and sale orders placed for each client on any given day. The extent we aggregate client orders for the purchase or sale of securities are in accordance with the parameters set forth in SEC No-Action Letter, SMC Capital, Inc. We will not receive any additional compensation or remuneration as a result of the aggregation.

Consulting clients may decide to use any broker-dealer to execute some or all of their transactions. However, we currently recommend Schwab and TradeKing for this group of clients. In the case they select a different firm, the client will have the sole responsibility for negotiating commission rates and other transaction costs with the broker/dealer. If a client selects a specific broker, we will not be required to effect any transaction through the specified broker if we reasonably believe that to do so may result in a breach of fiduciary duties. We will not seek better execution services or prices from other broker-dealers or be able to batch client transactions for execution through other broker-dealers with orders for other accounts managed by Snider Advisors. As a result, the client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case.

#### Schwab Custody and Brokerage Costs

For our clients' accounts it maintains, Schwab generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab account. Schwab's commission rates applicable to our client accounts were negotiated based on our commitment to maintain a portion of our clients' assets in accounts at Schwab. This commitment benefits you because the overall commission rates you pay are lower than they would be if we had not made the commitment.

#### Products and Services Available to Us from Schwab

Schwab Advisor Services is Schwab's business serving independent investment advisory firms like us. They provide us and our clients with access to its institutional brokerage – trading, custody, reporting and related services – many of which are not typically available to Schwab retail customers. 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 on an unsolicited basis (we don't have to request them) and at no charge to us as long as we keep a total of at least \$10 million of our clients' assets in accounts at Schwab.

Here 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. They include investment research, both Schwab's own and that of third parties. We may use this research to service all or some substantial number of our clients' accounts, including accounts not maintained at Schwab. 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 clients' 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
- Technology, compliance, legal, and business consulting
- Publications and conferences on practice management and business succession
- Access to employee benefits providers, human capital consultants and insurance providers

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. Schwab may also provide us with other benefits such as occasional business entertainment of our personnel.

### 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 don't have to pay for Schwab's services so long as we keep a total of at least \$10 million of client assets in accounts at Schwab. The \$10 million minimum may give us an incentive to recommend or require 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. It is primarily supported by the scope, quality and price of Schwab's services based on the factors discussed above.

## ITEM 13 REVIEW OF ACCOUNTS

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### **Snider Advisors Asset Management Services**

*REVIEWS:* While the underlying securities within Asset Management Services accounts are continually monitored, these accounts are reviewed monthly. Accounts are reviewed in the context of the Snider Method.

These accounts are reviewed by Jesse Anderson, the Chief Investment Officer of Snider Advisors.

*REPORTS:* In addition to the monthly statements and confirmations of transactions that clients receive from their broker-dealer, we provide monthly and annual reports summarizing account performance.

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### **Snider Method Consulting Services**

*REVIEWS:* Accounts are not reviewed for clients who use Consulting Services, since these clients are primarily responsible for trading their own accounts using the methods taught in our seminars. Snider Advisors personnel are available to review account at the request of the client.

*REPORTS:* Clients will typically receive monthly statements and confirmations of transactions from their broker-dealer. Snider Advisors will not provide additional reports.

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### **Lattco AutoPilot Services**

*REVIEWS:* Accounts are reviewed monthly for clients who use Lattco AutoPilot. Accounts are monitored in the context of the Snider Investment Method. Activity is downloaded and monitored electronically for inconsistencies.

*REPORTS:* Clients will typically receive monthly statements and confirmations of transactions from their broker-dealer. Snider Advisors will provide continuous access to online reports summarizing account performance.

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### **Financial Planning Services**

*REVIEWS:* While reviews may occur at different stages depending on the nature and terms of the specific engagement, typically no formal reviews will be conducted for Financial Planning clients unless otherwise contracted for.

*REPORTS:* Financial Planning clients will receive a completed financial plan. Additional reports will not typically be provided unless otherwise contracted for.

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### **Chrisilis Investment Management Services**

*REVIEWS:* Underlying securities within client accounts are monitored daily. Accounts are reviewed in the context of target portfolio allocations.

These accounts are reviewed by the investment managers of Chrisilis.

*REPORTS:* In addition to the monthly statements and confirmations of transactions that clients receive from their broker-dealer, they have continuous access to online reports summarizing account performance.

## ITEM 14 CLIENT REFERRALS AND OTHER COMPENSATION

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### Incoming Referrals

Chronim has been fortunate to receive many client referrals over the years. The referrals have come from current clients, accountants, employees, personal friends of employees and other sources. The firm does not pay for referrals.

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### Referrals to Other Professionals

Snider Advisors may refer clients to the unaffiliated broker-dealer, TradeKing. As a result of this arrangement, TradeKing will pay Snider Advisors a flat referral fee if the clients fund an account with them. The fee is not contingent on any other activity such as total assets or trading activity. Clients are under no obligation to act upon any recommendations of Snider Advisors or to effect any transactions through TradeKing. While we endeavor at all times to put the interest of our clients first as part of our fiduciary duty, the possibility of receiving incentive awards creates a conflict of interest, and may affect the judgment of these individuals when making recommendations. A potential conflict of interest may arise between the client's interest in obtaining best price and execution and Snider's interest in receiving future referral fees. To mitigate this conflict, clients have the option to open accounts through other unaffiliated broker-dealers Snider Advisors has established for this purpose.

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### Other Compensation

Chronim receives without cost, access to clients' accounts and data to support clients trading on the TradeKing platform. This allows us to better monitor client accounts maintained at TradeKing. These services are offered on similar terms by TradeKing to all its affiliated advisors and retail clients.

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 that have their clients maintain accounts at Schwab. These products and services, how they benefit us, and the related conflicts of interest are described above (see Item 12 Brokerage Practices). The availability to us of Schwab's products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

## ITEM 15 CUSTODY

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We previously disclosed in the "Fees and Compensation" section (Item 5) of this Brochure that our firm directly debits advisory fees from client accounts.

As part of this billing process, the client's custodian is advised of the amount of the fee to be deducted from that client's account. On at least a quarterly basis, the custodian is required to send to the client a statement showing all transactions within the account during the reporting period.

Because the custodian does not calculate the amount of the fee to be deducted, it is important for clients to carefully review their custodial statements to verify the accuracy of the calculation, among other things. Clients should contact us directly if they believe that there may be an error in their statement.

Our firm does not have actual or constructive custody of client accounts or funds.

## ITEM 16 INVESTMENT DISCRETION

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### **Discretionary Authority for Trading**

Clients may hire us to provide discretionary asset management services, in which case we place trades in a client's account without contacting the client prior to each trade to obtain the client's permission.

Our discretionary authority includes the ability to do the following without contacting the client:

- Determine the security to buy or sell; and/or
- Determine the amount of the security to buy or sell

Clients give us discretionary authority when they sign a discretionary agreement with our firm. Should a client have certain restrictions on specific stock transactions, we can assist them in implementing the strategy with those restrictions accounted for.

Snider Advisors Clients may hire us to provide consulting services, in which case we place trades in a client's account only if specifically requested by the client. Clients may also request that we perform the monthly trades specified by the Snider Method if they are unable to access the market when required to do so. These Vacation Trade requests trigger a short window of time in which we have discretionary authority to place trades in their accounts. Under this discretionary authority we follow the same process and place the same trades as dictated by the strict rules of the Snider Investment Method.

Our discretionary authority includes the ability to do the following without contacting the client:

- Determine the security to buy or sell; and/or
- Determine the amount of the security to buy or sell

Clients give us discretionary authority when they sign our client agreement, sign a limited trading authorization, and request a Vacation Trade. They may not limit this authority.



## ITEM 17 VOTING CLIENT SECURITIES

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### Proxy Votes

As a matter of firm policy, we do not vote proxies on behalf of clients. Therefore, although our firm may provide investment advisory services relative to client investment assets, clients maintain exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the client's investment assets. Clients are responsible for instructing each custodian of the assets, to forward to the client copies of all proxies and shareholder communications relating to the client's investment assets.

We do not offer any consulting assistance regarding proxy issues to clients.

## ITEM 18 FINANCIAL INFORMATION

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### Financial Condition

Chronim does not have any financial impairment that will preclude the firm from meeting contractual commitments to clients. A balance sheet is not required to be provided because Chronim does not serve as the custodian for client funds or securities, and does not require payment of fees of more than \$1,200 per client, six months or more in advance.

Chronim has not been the subject of a bankruptcy petition at any time.

**CHRONIM INVESTMENTS, INC.**  
**DBA SNIDER ADVISORS**  
**DBA CHRISILIS**

Business Address: 100 Decker Court, Suite 120, Irving, TX 75062  
Business Phone: (214)220-0055

Snider Advisors: [support@snideradvisors.com](mailto:support@snideradvisors.com)  
[www.snideradvisors.com](http://www.snideradvisors.com)

Chrisilis: [support@chrisilis.com](mailto:support@chrisilis.com)  
[www.chrisilis.com](http://www.chrisilis.com)

February 1, 2017

This Form ADV Part 2B, also called the “Brochure Supplement,” provides information about the following supervised persons employed by Chronim Investments, Inc.:

Jesse G. Anderson, Chronim Investments: Chief Compliance Officer  
Snider Advisors: Chief Executive Officer / Chief Investment Officer  
Chrisilis: President  
Direct Line: (214)446-8533

Shelley Seagler, Snider Advisors: Manager of Training  
Direct Line: (214)446-8538

Tyler Curtis, Snider Advisors: Chief Operating Officer  
Chrisilis: Chief Executive Officer  
Direct Line: (214)446-8541

Robert Brauer, Snider Advisors: Financial Advisor  
Direct Line: (214)446-8529

The information about the above named supervised persons, set forth below, supplements the Chronim Investments “Firm Brochure.” You should have received a copy of that brochure. Please contact Jesse Anderson at (214)446-8533 if you did not receive the Chronim “Firm Brochure” or if you have any questions about the contents of this brochure.

“Supervised persons” within Chronim covered by the Brochure Supplement are identified as persons who: (i) formulate investment advice for clients and have direct client contact; or (ii) make discretionary investment decisions for clients’ assets, even if the supervised person has no direct client contact. Hence, this Brochure Supplement provides information for registered representatives of Chronim as well as the firm’s leadership.

In the information about each supervised person provided below:

“Educational background” refers to the supervised person’s post-high school education.

“Business background” refers to the supervised person’s business experience for the last 5 years.

“Disciplinary information” refers to legal or disciplinary events that are material to your evaluation of the supervised person, such as civil lawsuits, proceedings before a government or self-regulatory agency relating to investment activity, or criminal proceedings.

“Other business activities” refers to whether the supervised person is actively engaged in any investment-related business or occupation other than his or her employment by Chronim.

“Additional compensation” refers to whether the supervised person receives an economic benefit for providing investment advice other than his or her regular salary from Chronim.

“Supervisor” refers to the person at Chronim who supervises the supervised person’s investment activities on behalf of the firm. The supervision takes place in various forms: attending client meetings and seminars, listening to the supervised persons’ telephone conversations with clients, regular meetings with the supervised persons and handling client complaints. In addition, there are a number of internal controls related to the supervised persons where reporting is made to the President/CEO and Chief Compliance Officer.

## JESSE G. ANDERSON, CFA

100 Decker Court, Suite 120, Irving TX 75062

Business Phone: (214)446-8533

Email: [janderson@snideradvisors.com](mailto:janderson@snideradvisors.com) & [janderson@chrisilis.com](mailto:janderson@chrisilis.com)

Web: [www.snideradvisors.com](http://www.snideradvisors.com) & [www.chrisilis.com](http://www.chrisilis.com)

Year of birth: 1983

Educational background: Bachelor of Science in Business Administration – Robert Morris University

Business background:

*Chronim Investments, Inc* – Employee (05/2005 to Present), Chief Compliance Officer (2011-Present)

Professional Designations:

*Chartered Financial Analyst* – The Chartered Financial Analyst (CFA) charter is a globally respected, graduate-level investment credential established in 1962 and awarded by CFA Institute — the largest global association of investment professionals.

There are currently more than 90,000 CFA charter holders working in 134 countries. To earn the CFA charter, candidates must:

- 1) Pass three sequential, six-hour examinations;
- 2) Have at least four years of qualified professional investment experience;
- 3) Join CFA Institute as members
- 4) Commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

High Ethical Standards

The CFA Institute Code of Ethics and Standards of Professional Conduct, enforced through an active professional conduct program, require CFA charterholders to:

- Place their clients' interests ahead of their own
- Maintain independence and objectivity
- Act with integrity
- Maintain and improve their professional competence
- Disclose conflicts of interest and legal matters

Global Recognition

Passing the three CFA exams is a difficult feat that requires extensive study (successful candidates report spending an average of 300 hours of study per level). Earning the CFA charter demonstrates mastery of many of the advanced skills needed for investment analysis and decision making in today's quickly evolving global financial industry. As a result, employers and clients are increasingly seeking CFA charterholders—often making the charter a prerequisite for employment. Additionally, regulatory bodies in 22 countries and territories recognize the CFA charter as a proxy for meeting certain licensing requirements, and more than 125 colleges and universities around the world have incorporated a majority of the CFA Program curriculum into their own finance courses.

Comprehensive and Current Knowledge

The CFA Program curriculum provides a comprehensive framework of knowledge for investment decision making and is firmly grounded in the knowledge and skills used every day in the investment profession. The three levels of the CFA Program test a proficiency with a wide range of fundamental and advanced investment topics, including ethical and professional standards, fixed-income and equity analysis, alternative and derivative investments, economics, financial reporting standards, portfolio management, and wealth planning.

The CFA Program curriculum is updated every year by experts from around the world to ensure that candidates learn the most relevant and practical new tools, ideas, and investment and wealth management skills to reflect the dynamic and complex nature of the profession.

To learn more about the CFA charter, visit [www.cfainstitute.org](http://www.cfainstitute.org).

Disciplinary information: None

Other business activities: Licensed Insurance Representative (TX License# 1721455) Jesse Anderson spends less than 5% of his time on insurance based solutions.

Additional compensation: Advisors are not compensated directly for the sale of any investment or insurance products; however, the firm does receive commissions and may indirectly compensate the advisors based on the volume of sales. The incentives offered by insurance companies inherently cause a conflict of interest.

Supervised by:

Tyler Curtis (214-446-8541) is responsible for all supervision and monitoring of investment advice offered to clients by Jesse G. Anderson. He monitors Jesse's work through frequent office interactions as well as remote interactions. He also reviews Jesse's activities through our client relationship management system.

At least once a year, employees are required to review our Policies and Procedures and Code of Ethics manuals. They require that all violations or reportable events be brought to the attention of the Manager for remediation or resolution. If the violation or reportable event involves the Manager, the Chief Financial Officer will act in his place.

This advisor has never been found liable in an arbitration claim, civil, self-regulatory organization, or administrative proceeding involving any of the following:

- (a) An investment or an investment-related business activity
- (b) Fraud, false statement(s), or omissions
- (c) Theft, embezzlement, or other wrongful taking of property
- (d) Bribery, forgery, counterfeiting, or extortion
- (e) Dishonest, unfair, or unethical practices

Additional information about Jesse G. Anderson (CRD# 5002910) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Shelley Seagler

100 Decker Court, Suite 120, Irving TX 75062

Business Phone: (214)220-0055

Email: [sseagler@snideradvisors.com](mailto:sseagler@snideradvisors.com) & [sseagler@chrisilis.com](mailto:sseagler@chrisilis.com)

Web: [www.snideradvisors.com](http://www.snideradvisors.com) & [www.chrisilis.com](http://www.chrisilis.com)

Year of birth: 1970

Educational background: Bachelor of Science – Texas Woman’s University

Business background:

*Chronim Investments, Inc* – Employee (11/2007 to Present)

*Pecunia Investments, Inc* – Manager of Training (10/2005 to 11/2007)

Disciplinary information: None

Other business activities: Licensed Insurance Representative (TX#-1604592). Shelley Seagler spends 35% of her time dealing with insurance based solutions.

Additional compensation: Advisors are not compensated directly for the sale of any investment or insurance products; however, the firm does receive commissions and may indirectly compensate the advisors based on the volume of sales. The incentives offered by insurance companies inherently cause a conflict of interest.

Supervised by:

Jesse Anderson, CFA is the Manager and Chief Compliance Officer of the firm and is responsible for the firm’s activities. He is responsible for all supervision and monitoring of investment advice offered to clients by Shelley Seagler. He can be reached directly at 214-446-8533. He monitors Shelley Seagler’s work through frequent office interactions as well as remote interactions. He also reviews Shelley Seagler’s activities through our client relationship management system.

At least once a year, employees are required to review our Policies and Procedures and Code of Ethics manuals. They require that all violations or reportable events be brought to the attention of the Manager for remediation or resolution. If the violation or reportable event involves the Manager, the Chief Financial Officer will act in his place.

This advisor has never been found liable in an arbitration claim, civil, self-regulatory organization, or administrative proceeding involving any of the following:

- (a) An investment or an investment-related business activity
- (b) Fraud, false statement(s), or omissions
- (c) Theft, embezzlement, or other wrongful taking of property
- (d) Bribery, forgery, counterfeiting, or extortion
- (e) Dishonest, unfair, or unethical practices

Additional information about Shelley Seagler (CRD# 5451277) is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Tyler Curtis

100 Decker Court, Suite 120, Irving TX 75062

Business Phone: (214)220-0055

Email: [tcurtis@snideradvisors.com](mailto:tcurtis@snideradvisors.com) & [tcurtis@chrisilis.com](mailto:tcurtis@chrisilis.com)

Web: [www.snideradvisors.com](http://www.snideradvisors.com) & [www.chrisilis.com](http://www.chrisilis.com)

Year of birth: 1985

Educational background: Bachelor of Science – Oklahoma State University

Business background:

*Chronim Investments, Inc* – Employee (06/2007 to Present)

Disciplinary information: None

Other business activities: None

Additional compensation: None

Supervised by:

Jesse Anderson, CFA is the Manager and Chief Compliance Officer of the firm and is responsible for the firm's activities. He is responsible for all supervision and monitoring of investment advice offered to clients by Tyler Curtis. He can be reached directly at 214-446-8533. He monitors Tyler Curtis's work through frequent office interactions as well as remote interactions. He also reviews Tyler Curtis's activities through our client relationship management system.

At least once a year, employees are required to review our Policies and Procedures and Code of Ethics manuals. They require that all violations or reportable events be brought to the attention of the Manager for remediation or resolution. If the violation or reportable event involves the Manager, the Chief Financial Officer will act in his place.

This advisor has never been found liable in an arbitration claim, civil, self-regulatory organization, or administrative proceeding involving any of the following:

- (a) An investment or an investment-related business activity
- (b) Fraud, false statement(s), or omissions
- (c) Theft, embezzlement, or other wrongful taking of property
- (d) Bribery, forgery, counterfeiting, or extortion
- (e) Dishonest, unfair, or unethical practices

Additional information about Tyler Curtis (CRD# 5369644) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## ROBERT BRAUER

100 Decker Court, Suite 120, Irving TX 75062

Business Phone: (214)220-0055

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Web: [www.snideradvisors.com](http://www.snideradvisors.com) & [www.chrisilis.com](http://www.chrisilis.com)

Year of birth: 1988

Educational background: Bachelor of Arts- Texas Tech University, Lubbock, Texas; Master of Arts- Texas Tech University

Business background:

*Chronim Investments, Inc* – Employee (10/2014 to Present)

*Wellington Claim Service, Inc.* – Claims Examiner (02/2013-08/2014)

*Real Time Resolutions, Inc.* – Collections Analyst (10/2012 to 01/2013)

Disciplinary information: None

Other business activities: None

Additional compensation: None

Supervised by:

Jesse Anderson, CFA is the Manager and Chief Compliance Officer of the firm and is responsible for the firm's activities. He is responsible for all supervision and monitoring of investment advice offered to clients by Robert Brauer. He can be reached directly at 214-446-8533. He monitors Robert Brauer's work through frequent office interactions as well as remote interactions. He also reviews Robert Brauer's activities through our client relationship management system.

At least once a year, employees are required to review our Policies and Procedures and Code of Ethics manuals. They require that all violations or reportable events be brought to the attention of the Manager for remediation or resolution. If the violation or reportable event involves the Manager, the Chief Financial Officer will act in his place.

This advisor has never been found liable in an arbitration claim, civil, self-regulatory organization, or administrative proceeding involving any of the following:

- (a) An investment or an investment-related business activity
- (b) Fraud, false statement(s), or omissions
- (c) Theft, embezzlement, or other wrongful taking of property
- (d) Bribery, forgery, counterfeiting, or extortion
- (e) Dishonest, unfair, or unethical practices

Additional information about Robert Brauer (CRD#6410140) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).