

# TJT Capital Group, LLC



**TJT Capital Group, LLC**  
**FORM ADV PART 2A - BROCHURE**  
**March 29, 2018**

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**This brochure provides information about the qualifications and business practices of TJT Capital Group, LLC. If you have any questions about the contents of this brochure, please contact us at 203.504.8850. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or by any state securities authority.**

**Additional information about TJT Capital Group, LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

**TJT Capital Group, LLC is an SEC registered investment adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.**

## Item 2: Material Changes

On September 25, 2009, Genworth Financial Wealth Management, Inc. (“Former Employer”) initiated a civil lawsuit in the U.S. District Court, District of Connecticut (Docket No. 3:09-cv-01521) against TJT Capital Group, LLC and its principals. Former Employer alleged TJT Capital Group, LLC used trade secrets and other confidential information without authorization to do so and improperly solicited clients.

On April 8, 2013, TJT Capital Group, LLC and its principals entered into a settlement agreement with Former Employer to resolve the lawsuit (the “Settlement Agreement”). Pursuant to the Settlement Agreement, TJT Capital Group, LLC and its principals agreed to cease all communications with clients of Former Employer and agreed to pay a monetary settlement. Further information regarding the civil litigation and the Settlement Agreement can be found in TJT Capital Group, LLC’s ADV Part 1A which is available at <https://www.adviserinfo.sec.gov/IAPD/default.aspx>.

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## Item 4: Advisory Business

**TJT Capital Group, LLC** is an SEC registered investment adviser located in Stamford, Connecticut. We are organized as a limited liability company under the laws of the state of Delaware. Timothy McMullan, James A. Cook and Timothy McFadden are the Managing Members and Principal Owners of TJT Capital Group, LLC. TJT Capital Group, LLC has been providing investment advisory services since 2009. We offer the following investment advisory services, which are tailored to meet the needs of each individual client:

- Portfolio Management services for individuals and/or small businesses
- Portfolio Management services for businesses or institutional clients (other than investment companies)

The following paragraphs describe our investment advisory services. Please refer to the description of each investment advisory service listed below for information on how we tailor our advisory services to your individual needs. Throughout this brochure, the words “we”, “our” and “us” refer to TJT Capital Group, LLC and the words “you”, “your” and “client” refer to you as either a client or prospective client of our firm. Also, you may see the term Associated Person throughout this brochure. As used in this brochure, our Associated Persons are our firm’s officers, employees, and all individuals providing investment advice on behalf of our firm.

### **Portfolio Management Services**

#### **Directly Managed Accounts**

TJT Capital Group, LLC primarily focuses on asset allocation and mutual fund and exchange-traded fund (ETFs) selection for the investment management of its client accounts, on a discretionary basis, among our investment objective categories. The allocation and selection are tailored to the client’s stated investment goals and objectives in conjunction with our assessment of risk conditions. We are authorized, without prior consultation or approval with a client, to buy, sell, trade and allocate in and among stocks, bonds, ETFs, mutual funds, sub-advisers, independent investment managers and/or programs (with or without discretion, depending upon the independent investment manager or program) and other securities and/or contracts relating to the same, on margin (only if written authorization has been granted) or otherwise, and to give instructions in furtherance of such authority to the registered broker-dealer and the custodian of the assets.

We provide investment management services where the investment strategy and advice is tailored in an attempt to meet the needs of the client’s designated investment goals and objectives. Unless the client has advised us to the contrary, in writing, there are no restrictions that the client has imposed upon the adviser with respect to the management of the assets. At the opening of the account, TJT Capital Group, LLC, through its designated representatives, shall obtain from the client information sufficient to determine the client’s financial situation and investment objectives. The client’s account is managed on the basis of the client’s financial situation and investment objectives in conjunction with our assessment of risk conditions. At least quarterly, TJT Capital Group, LLC shall notify the client to advise TJT Capital Group, LLC whether the client’s financial situation or investment objectives have changed, or if the client wants to impose and/or modify any reasonable restrictions on the management of his/her/its account. At least annually, TJT Capital Group, LLC shall contact the client to determine whether the client’s financial situation or investment objectives have changed, or if the client wants to impose and/or modify any reasonable restrictions on the management of

his/her/its account(s). TJT Capital Group, LLC shall be reasonably available to consult with the client relative to the status of the client's account.

### **Independent Managers**

We may allocate (and/or recommend that the client allocate) a portion of a client's investment assets among unaffiliated independent investment managers in accordance with the client's designated investment objectives. In such situations, the Independent Manager[s] shall have day-to-day responsibility for the active discretionary management of the allocated assets. TJT Capital Group, LLC shall continue to render investment supervisory services to the client relative to the ongoing monitoring and review of account performance, asset allocation and client investment objectives. Factors which TJT Capital Group, LLC shall consider in recommending Independent Manager[s] include the client's designated investment objectives, management style, performance, reputation, financial strength, reporting, pricing, and research.

### **Client Obligations**

The client agrees to promptly provide information and/or documentation requested by the adviser as it pertains to client's objectives, needs and goals, and maintains exclusive responsibility to keep the adviser informed of any changes. The adviser shall not be required to verify any information obtained from the client, the client's attorney, accountant or other professionals, and is expressly authorized to rely thereon.

### **Non-Investment Consulting/Implementation Services**

TJT Capital Group, LLC does not hold itself out as providing financial planning, estate planning, or insurance planning services. If requested by the client, we may provide limited advice regarding non-investment related matters. We are not an attorney, accountant or insurance agent, and no portion of our services should be construed as same. To the extent requested by a client, we may recommend the services of other professionals for certain non-investment implementation purposes (i.e. attorneys, accountants, insurance, etc.). The client is under no obligation to engage the services of any such recommended professional. The client retains absolute discretion over all such implementation.

### **TJT CAPITAL GROUP, LLC INVESTMENT OBJECTIVE CATEGORIES**

**TJT Capital Group, LLC offers the following four general investment objective categories:**

**Aggressive Growth:** This investment objective category is best suited for aggressive long-term investors willing to accept higher volatility in the pursuit of potentially higher returns over a full market cycle. The focus is on using open-end mutual funds, closed-end mutual funds and exchange traded funds (ETFs) with risk/return characteristics that, in the opinion of management, have the potential to meet the objectives. Funds may include domestic, international and emerging market equities and fixed-income securities, currency and commodity funds.

**Growth:** This investment objective category is suited for investors with a long-term investment time horizon willing to tolerate above average risk and volatility with the goal of achieving above-average growth of principal. The focus is on using open-end mutual funds, closed-end mutual funds and ETFs that invest in domestic large-, mid- and small-capitalized securities, international funds (including developed and emerging markets), fixed-income, and currency and commodity funds.

**Balanced:** This investment objective category is designed with a combination of equity and fixed-income securities providing the potential for growth of a portion of the capital over time, with a commensurate

allocation to fixed-income securities to provide a current income stream. The focus is on using open-end mutual funds, closed-end mutual funds and ETFs. Although at a neutral weighting the equity and fixed-income portion will approximate 50% each, changing market conditions and our assessment of risk conditions could cause those percentages to differ materially.

**Income:** This investment objective category is designed for those seeking above-average incomes from government, corporate and municipal securities, with the goal of being more tactical and opportunistic in taking advantage of market conditions. The focus is on using open-end mutual funds, closed-end mutual funds and ETFs. Equity, Real Estate Investment Trust (REIT), and utility funds may also be used from time to time. The expectation for higher income over a full market cycle will be accompanied by a higher risk profile.

**Please note that there can be no assurance that the above investment category objectives will be met.**

### **Types of Investments**

TJT Capital Group, LLC primarily focuses on the asset allocation and mutual fund and exchange-traded fund (ETFs) selection, on a discretionary basis, in accordance with the client's designated investment objectives and goals in conjunction with our assessment of risk conditions. We may also provide advice on any type of investment held in your portfolio at the inception of our advisory relationship. You may request, within reason that we refrain from investing in particular securities or certain types of securities, including restricting purchases of certain mutual funds. You must provide these restrictions to our firm in writing.

### **Assets Under Management**

As of December 31, 2017, our client assets under management (AUM) were as follows:

- Discretionary client AUM: \$245,435,181.00
- Non-Discretionary client AUM: \$0.00

## **Item 5: Fees and Compensation**

Our annual investment advisory fee shall be based upon a percentage (%) of the market value of the account assets placed under our management (between 1.50% and 0.40%), as set forth below:

### **Income Based Portfolios**

| <b>Assets Under Management</b>       | <b>Annualized Fee Rate</b> |
|--------------------------------------|----------------------------|
| Assets up to \$499,999               | 0.50%                      |
| Assets between \$500,000 - \$999,999 | 0.45%                      |
| Assets in excess of \$1,000,000      | 0.40%                      |

### **Equity Based Portfolios**

| <b>Assets Under Management</b>           | <b>Annualized Fee Rate</b> |
|--|----------------------------|
| Assets up to \$499,999                   | 1.50%                      |
| Assets between \$500,000 - \$749,999     | 1.25%                      |
| Assets between \$750,000 - \$999,999     | 1.125%                     |
| Assets between \$1,000,000 - \$1,999,999 | 1.00%                      |
| Assets in excess of \$2,000,000          | 0.85%                      |

Our annual investment advisory fee shall be paid quarterly, in advance, based upon the market value of the account assets on the last business day of the previous quarter. Our fees will be prorated in the event the investment advisory agreement is executed at any time other than the first day of a calendar quarter. We will either invoice you directly or as paying agent for our firm, your independent custodian will directly debit your account(s) for the payment of our investment advisory fee(s). No increase in the fee percentage shall be effective without prior written notification to the client.

We generally require a minimum account balance of \$100,000. We may, in our sole discretion, waive or reduce its minimum account balance requirement. Additionally, we may, in our sole discretion, charge a lesser investment advisory fee based upon certain criteria, for example, anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, or negotiations with client.

### **Termination of the Agreement**

The management fee will be pro-rated for the quarter in which the written termination notice was received (e-mail notice will not suffice) and any unearned fees will be refunded to you.

### **Additional Fees and Expenses**

As part of our investment advisory services to you, we may invest, or recommend that you invest in mutual funds and ETFs. The fees that you pay to our firm for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds or exchange traded funds (described in each fund's prospectus) to their shareholders. These fees will generally include a management fee and other fund expenses. You may also incur transaction charges and/or brokerage fees when purchasing or selling securities. We use primarily no-load mutual funds, but no-load mutual funds may involve a transaction fee. These charges and fees are typically imposed by the broker-dealer or custodian through whom your account transactions are executed. We do not share in any portion of the brokerage fees/transaction charges imposed by the broker-dealer or custodian. To fully understand the total cost you will incur, you should review all the fees charged by mutual funds, exchange traded funds, the custodian, our firm, and by others. For more information regarding brokerage practices, please refer to the "Brokerage Practices" section of this brochure.

## **Item 6: Performance-Based Fees and Side-By-Side Management**

We do not accept performance-based fees or participate in side-by-side management.

## **Item 7: Types of Clients**

We offer investment advisory services to individuals, high net worth individuals, pension and profit sharing plans, trusts, estates, charitable organizations, corporations, and other business entities. In general, we require a minimum account balance of \$100,000.00. TJT Capital Group, in its sole discretion, may waive or reduce its minimum account balance requirement.

## **Item 8: Methods of Analysis, Investment Strategies and Risk of Loss**

## **Methods of Analysis and Investment Strategies**

TJT Capital Group, LLC uses a combination of fundamental, technical and cyclical methods to determine asset allocation and fund selection in client accounts. The main sources of information include The Federal Reserve, Government Agencies, prospectuses, financial newspapers, magazines, websites and research materials prepared by others. From time to time, TJT Capital Group, LLC will meet with portfolio managers of mutual funds in order to get further insight into their investing process. All investment strategies and funds used have the potential for risk of loss, and losses can equal that of an investor's invested capital.

TJT Capital Group primarily utilizes mutual funds and exchange traded funds (ETFs), however, we may utilize other types of investments such as stocks, bonds, etc., based on a clients stated goals and objectives. Mutual funds and exchange-traded funds (ETFs) are investment vehicles that are made up of a pool of funds collected from many investors for the purpose of investing in securities such as stocks, bonds, money market instruments and similar assets. Mutual funds and exchange traded funds (ETFs) are operated by money managers, who invest the fund's capital and attempt to produce capital gains and income for the fund's investors. Mutual funds and exchange-traded funds (ETFs)'s portfolios are structured and maintained to match the investment objectives stated in its prospectus. Mutual funds and exchange-traded funds (ETFs) also come with some risks, including but not limited to the following:

- Credit Risk
- Call Risk
- Principal Risk
- Prepayment Risk
- Market Risk
- Country Risk
- Inflation Risk
- Manager Risk
- Currency Risk

Our strategies and investments may have unique and significant tax implications. However, unless we specifically agree otherwise, and in writing, tax efficiency is not our primary consideration in the management of your assets. Regardless of your account size or any other factors, we strongly recommend that you regularly consult with a tax professional prior to and throughout the investing of your assets.

As a result of revised IRS regulations, custodians and broker-dealers will begin reporting the cost basis of equities acquired in client accounts on or after January 1, 2011. Your custodian will default to the FIFO (First In First Out) accounting method for calculating the cost basis of your investments. You are responsible for contacting your tax advisor to determine if this accounting method is the appropriate choice for you. If your tax advisor believes another accounting method is more advantageous, please provide written notice to our firm immediately and we will notify your account custodian of your individually selected accounting method. Please note that decisions regarding the designation of cost basis accounting methods will need to be made before the trades settles, as the cost basis method cannot be changed after the trade settlement date.

## **Investment Risk**

Different types of investments involve varying degrees of risk, therefore, investing in securities involves a risk of loss that you should be prepared to bear. TJT Capital Group, LLC does not guarantee the future performance of an account or any specific level of performance, the success of any investment recommendation or strategy that we may take or recommend for the account, or the success of our overall



management of the account. The investment recommendation for the account made by TJT Capital Group, LLC are subject to various markets, currency, economic, political and business risks, and that those investment decisions will not always be profitable. Past performance is in no way an indication of future performance.

## **Item 9: Disciplinary Information**

On September 25, 2009, Genworth Financial Wealth Management, Inc. (“Former Employer”) initiated a civil lawsuit in the U.S. District Court, District of Connecticut (Docket No. 3:09-cv-01521) against TJT Capital Group, LLC and its principals. Former Employer alleged TJT Capital Group, LLC used trade secrets and other confidential information without authorization to do so and improperly solicited clients.

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## **Item 10: Other Financial Industry Activities and Affiliations**

### **Recommendation of Other Advisers**

TJT Capital Group, LLC has entered into a portfolio consulting agreement with Carlson Wealth Advisors, LLC (CWA). CWA will receive compensation from TJT Capital Group, LLC for those accounts on which CWA is consulted. You are not obligated, contractually or otherwise, to use the services of CWA.

### **Business Access Line of Credit**

TJT Capital Group, LLC has a Business Access Line of Credit at M&T Bank in the amount of \$250,000.00. This is a discretionary line of credit due on demand. The credit line is secured by a first-person lien on the business assets of TJT Capital Group, LLC, and is personally guaranteed by Timothy McMullan, James Cook, and Timothy McFadden. The balance on this Line of Credit has the ability to change daily. TJT Capital Group, LLC has a balance due of approximately \$36,000.00 on this Line of Credit as of March 29, 2018.

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

### **Description of Our Code of Ethics**

TJT Capital Group, LLC Code of Ethics includes guidelines for professional business conduct standards for our Associated Persons. Our goal is to continuously protect your interests at all times and to demonstrate our commitment to our fiduciary duties while dealing with you. All of our Associated Persons are expected to strictly adhere to these guidelines. Our Code of Ethics also requires that certain persons associated with our firm submit reports of their personal account holdings and transactions to a qualified representative of our firm who will review these reports on a periodic basis. Persons associated with our firm are also required to report any violations of our Code of Ethics policy to Timothy McFadden, Chief Compliance Officer. In addition,

we maintain and enforce our written policies and procedures, which are reasonably designed to prevent the misuse of material, non-public information about you or your account holdings by Associated Persons of our firm.

Clients or prospective clients may obtain a copy of our Code of Ethics by contacting us at the telephone number listed on the cover page of this brochure.

### **Participation or Interest in Client Transactions**

Neither TJT Capital Group, LLC or any Associated Persons of our firm has any material financial interest in client transactions beyond the condition of agreement of investment advisory services as disclosed in this brochure.

### **Personal Trading Practices**

Associated Persons of TJT Capital Group, LLC may buy or sell the same securities that we recommend to you or securities in which you are already invested in. A conflict of interest could potentially exist because we may have the ability to trade ahead of you and could potentially receive a more favorable price than you would receive. To eliminate this potential conflict of interest, it is our policy that Associated Persons of TJT Capital Group, LLC shall not have priority over your account in the purchase or sale of securities.

## **Item 12: Brokerage Practices**

TJT Capital Group, LLC does not maintain custody of your assets on which we advise (although we may be deemed to have custody of your assets if you give us authority to withdraw assets from your account (see item 15 Custody, below). Your assets must be maintained in an account at a “qualified custodian,” generally a broker-dealer or bank. TJT Capital Group, LLC is independently owned and operated and is not affiliated with any “qualified custodian.” TJT Capital Group, LLC recommends a custodian/broker who will hold your assets and execute transactions on terms that are, overall, most advantageous when compared to other available providers and their services. We consider a wide range of factors, including, among others:

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

Based on the above criteria, we generally recommend that our clients use one of the following unaffiliated, qualified custodians for execution and/or custodial services (exclusive of those clients that may direct TJT Capital Group, LLC to use a specific broker-dealer/custodian):

- Schwab Advisor Services, Division of Charles Schwab & Co., Inc. (Schwab), a registered broker-dealer, member SIPC
- TD Ameritrade Institutional (“TD Ameritrade”), Division of TD Ameritrade, Inc., member FINRA/SIPC/NFA

We are not affiliated with Schwab or TD Ameritrade and are independently owned and operated. Schwab and TD Ameritrade provide us access to their institutional brokerage trading, custody, reporting, and related services, many of which are not typically available to retail investors. Some of those services help us manage or administer our clients’ accounts; while others help us manage and grow our business. Schwab’s and TD Ameritrade support services generally are available on an unsolicited basis (we don’t have to request them) and at no charge to us (however, please note that Schwab requires that we collectively maintain a total of at least \$10 million in client assets at Schwab. If our clients collectively have less than \$10 million in assets at Schwab, Schwab may charge us a quarterly service fee of \$1,200.00).

Schwab and TD Ameritrade generally do not charge client accounts separately for custody. Schwab and TD Ameritrade are generally compensated by account holders through commissions or other transaction-related fees for securities trades that are executed or settled by Schwab or TD Ameritrade.

Schwab and TD Ameritrade also makes available to us other products and services that benefit our firm but may not benefit our client accounts. Some of these other products and services assist us in managing and administering client accounts. These products and services include software and other technology that: provide access to client account data (such as trade confirmations and account statements); facilitate trade execution; provide research, pricing information, and other market data; facilitate payment of our investment advisory fees from client accounts; and provide assistance with back-office functions, recordkeeping, and client reporting. Generally, many of these services may be used to service all or a substantial number of our client accounts, including accounts not maintained at Schwab and TD Ameritrade. Schwab and TD Ameritrade also makes available to us other services intended to help us manage and grow our business. These services may include consulting, publications and conferences on practice management, legal, information technology, business succession, regulatory compliance, and marketing. In addition, Schwab and TD Ameritrade may make available, arrange, and/or pay for these types of services rendered to us by independent third parties. Schwab and TD Ameritrade may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third party providing these services to us. As a fiduciary, we endeavor to act in the best interests of our clients. However, our recommendation that clients maintain their assets in accounts at Schwab or TD Ameritrade may be based in part on benefits provided to our firm by the availability of some of the foregoing products and services and not solely on the nature, cost, or quality of custody and brokerage services provided by Schwab or TD Ameritrade, which may create a potential conflict of interest.

### **Directed Brokerage**

The client may direct TJT Capital Group, LLC to use a particular broker-dealer (subject to TJT Capital Group, LLC right to decline and/or terminate the engagement) to execute some or all transactions for the client's account. In such event, the client will negotiate terms and arrangements for the account with that broker-dealer, and we will not seek better execution services or prices from other broker-dealers or be able to "batch" the client's transactions for execution through other broker-dealers with orders for other accounts managed by us. As a

result, 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.

In the event that the client directs TJT Capital Group, LLC to effect securities transactions for the client's accounts through a specific broker-dealer, the client correspondingly acknowledges that such direction may cause the accounts to incur higher commissions or transaction costs than the accounts would otherwise incur had the client determined to effect account transactions through alternative clearing or custodial arrangements that may be available through TJT Capital Group, LLC.

#### **Brokerage for Client Referrals**

We do not receive client referrals from broker-dealers in exchange for any form of compensation.

### **Item 13: Review of Accounts**

Client accounts are monitored on an ongoing basis. Reviews of client accounts are conducted by the firm's principals, Timothy McMullan, James Cook and Timothy McFadden, on both an individual and collaborative basis. In addition, Timothy McFadden, in his role as Chief Compliance Officer, is responsible for the supervisory review process for our firm, which includes the overall review of client accounts. The firm's principals meet at least weekly to review trading, markets, risk conditions, and information that can have a material effect on client accounts. All formal reviews of client accounts is memorialized and added to the client's records. Clients are encouraged to request an account review at any time.

All new clients complete an investment questionnaire to assess the client's investment objectives, risk tolerance, and to establish specific restrictions, if applicable. Existing clients may update their investment questionnaire, at any time, by requesting and completing a new questionnaire. On a quarterly basis we produce and deliver to clients an account holdings statement and performance reports, as well as an assessment of risk conditions. Additionally, clients receive statements from the custodian holding client funds and securities at least quarterly.

### **Item 14: Client Referrals and Other Compensation**

If a client is introduced to TJT Capital Group, LLC by either an unaffiliated or an affiliated Solicitor, we may pay that solicitor a referral fee in accordance with the requirements of Rule 206(4)-3 of the Investment Advisers Act of 1940, and any corresponding state securities law requirements. Any such referral fee shall be paid solely from our investment advisory fee and shall not result in any additional charge to the client. If the client is introduced to TJT Capital Group, LLC by an unaffiliated solicitor, at the time of the solicitation, the unaffiliated solicitor shall disclose the nature of his/her/its solicitor relationship, and shall provide each prospective client with a copy of TJT Capital Group, LLC's Form ADV Part 2A Brochure, together with a copy of the Form ADV Part 2A Brochure from the solicitor to the client disclosing the terms of the solicitation arrangement between TJT Capital Group, LLC and the solicitor, including the compensation to be received by the solicitor from TJT Capital Group, LLC.

TJT Capital Group, LLC has entered into a portfolio consulting agreement with Carlson Wealth Advisors, LLC (CWA). CWA may refer potential prospects to TJT Capital Group, LLC, and if those prospects become clients of TJT Capital Group, LLC, CWA will receive compensation from TJT Capital Group, LLC based on the clients

account value. Compensation paid to CWA shall be paid solely by TJT Capital Group, LLC and shall not result in any additional charge to the client. You are not obligated, contractually or otherwise, to use the services of CWA.

Currently, TJT Capital Group, LLC does not receive any compensation from any third party in connection with providing investment advice to you.

Please refer to the “Brokerage Practices” section above for disclosures on research and other benefits we may receive resulting from our relationship with Schwab and TD Ameritrade. The availability of these benefits is not based upon us giving particular investment advice, such as buying particular securities for our clients.

## **Item 15: Custody**

TJT Capital Group, LLC does not maintain physical custody of any of your funds or securities. Your funds and securities will be held with a broker-dealer, or other independent, qualified custodian. Our ability to deduct our investment advisory fees from your account(s) causes our firm to exercise custody over your funds or securities as deemed by government regulations. We may invoice you directly or as paying agent for our firm, your independent custodian will directly debit your account(s) for the payment of our advisory fee(s). You will receive account statements from the independent, qualified custodian(s) holding your funds and securities at least quarterly. The account statements from your custodian(s) will indicate the amount of our advisory fee(s), if they are deducted from your account(s). You should carefully review account statements for accuracy. If you have a question regarding your account statement or if you did not receive a statement from your custodian, please contact us at the telephone number listed on the cover page of this brochure. We also urge you to compare the account statements from your custodian(s) to the quarterly statements you will receive from us.

## **Item 16: Investment Discretion**

Before we can buy or sell securities on your behalf, you must first sign our discretionary investment advisory agreement, the custodian’s power of attorney, and/or trading authorization forms. You may grant our firm discretion over the selection and amount of securities to be purchased or sold for your account(s) without obtaining your consent or approval prior to each transaction. You may specify investment objectives, guidelines, and/or impose, within reason, certain conditions or investment parameters for your account(s). For example, you may request that we refrain from investing in particular securities or certain types of securities, or certain mutual funds. Please refer to the “Advisory Business” section in this brochure for more information on our discretionary management services.

## **Item 17: Voting Client Securities**

We will not vote proxies on behalf of your advisory account(s). If you own shares of common stock or mutual funds, you are exclusively responsible for exercising your right to vote as a shareholder. In addition, client maintains exclusive responsibility for making all elections relative to corporate actions, mergers, acquisitions,

tender offers, bankruptcy proceedings or other types of events pertaining to the client's investment assets. We do not offer advice or provide consultation regarding corporate actions and the exercise of your proxy voting rights.

## **Item 18: Financial Information**

TJT Capital Group, LLC does not require or solicit prepayment of more than \$1200.00 in fees per client, (6) six or more months in advance, or take custody of client funds or securities, or have a financial condition that is reasonably likely to lessen our ability to meet our commitments and obligations to you. Therefore, we are not required to include a balance sheet for our most recent fiscal year. Finally, TJT Capital Group, LLC has not been the subject of a bankruptcy petition at any time.