Item 1: Cover Page

CHECCHI

Form ADV Part 2A

Investment Adviser Brochure

March 31, 2024

This brochure provides information about the qualifications and business practices of Checchi Capital Advisers, LLC. If you have any questions about the contents of this brochure, please contact Adam D. Checchi, Managing Member, at 310-432-0010 and/or info@checchicapital.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Checchi Capital Advisers, LLC is also available on the SEC's website at www.adviserinfo.sec.gov. You may search this site using a unique identifying number, known as a CRD number, Checchi Capital Advisers, LLC's CRD Number is 143478.

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Item 2: Summary of Material Changes

Annual Update

In this Item of Checchi Capital Advisers, LLC's (CCA or the Firm) Form ADV 2, the Firm is required to discuss any material changes that have been made to Form ADV since the last Annual Amendment in March of 2023.

Material Changes since the Last Update

Since March of 2022, the following changes have been made to this document:

Item 8: Information has been added discussing CCA's Risk Parity Strategy for Separately Managed Accounts.

Full Brochure Available

CCA's Form ADV may be requested at any time, without charge by contacting Adam D. Checchi, Managing Member, at 310-432-0010 or adam@checchicapital.com.

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Item 4: Advisory Business

Firm Description

Checchi Capital Advisers, LLC (CCA or the Firm) is a registered investment adviser, which provides portfolio management services to high net worth individuals, trusts, foundations, charitable organizations, pension and profit sharing plans, corporations, and other business entities. CCA was founded in 2007.

Principal Owners

CCA is owned by Loeb Capital West, LLC, Canal Capital Partners, LLC , two trusts controlled by Kathryn D. Checchi, a Principal of CCA and Samuel T. Pfister. Adam D. Checchi, the Managing Member of CCA, is the sole member of Loeb Capital West, LLC.

Asset Management

CCA provides sophisticated globally diversified portfolio strategies for investors' core long-term liquid equity and fixed income investments. Customized investment portfolios will be constructed using proprietary statistical and mathematical models which maximize diversification and tax efficiency while minimizing turnover, transaction costs and management expenses.

CCA's strategies are based on individually constructed domestic and foreign fixed income and equity portfolios that use statistical sampling to approximate the distribution of the world's liquid traded assets by value. The gross returns and volatility of CCA portfolios should approximate the pre-tax returns of the major world indices weighted by market capitalization. CCA will include tax optimization and transaction cost reduction algorithms that optimize the client's tax position.

Assets are invested primarily in fixed income and equity, utilizing exchange-traded funds, where appropriate, to achieve maximum diversification. All securities are purchased or sold through a brokerage account. The brokerage firm charges a fee for stock and bond trades. CCA does not receive any compensation, in any form, from fund companies or brokers.

Investments may also include: equities (stocks), warrants, corporate debt securities, certificates of deposit, municipal securities, investment company securities (variable life insurance, variable annuities, and mutual funds shares), U. S. government securities, options contracts, futures contracts, and interests in partnerships.

Pooled Investment Vehicles

CCA serves as an investment adviser to two insurance dedicated funds, the CCA Core Return Insurance Fund and the CCA Aggressive Return Insurance Fund. CCA manages the Insurance Funds based on the investment goals and objectives as outlined in the Series Supplements to the Insurance Funds.

Separately Managed Accounts

CCA provides continuous advice to clients regarding investment of client funds based on the individual needs of the client. Through personal discussions in which goals and objectives based on a client's particular circumstances are established, CCA will create and manage a portfolio based on that client's needs.

Sub-Advisory Relationships

CCA provides services to other affiliated and unaffiliated registered investment advisers on a sub-advisory basis.

Tailored Relationships

CCA tailors advisory services to the individual needs of the client. The goals and objectives for each client are discussed and then an individual portfolio of domestic and foreign fixed-income and equity is constructed using a statistical sampling process to approximate the distribution of the world's liquid traded assets by value. The gross returns and volatility of CCA portfolios should approximate the pre-tax returns of the major world indices weighted by market capitalization. CCA will include tax optimization and transaction cost reduction algorithms that optimize the client's tax position. Clients may impose restrictions on investing in certain securities or types of securities.

Wrap Fee Programs

CCA does not participate in a Wrap Fee Program.

Client Assets

CCA manages client accounts and, as of December 31, 2022, these assets totaled approximately $1.9 billion. All accounts are managed on a discretionary basis.

Item 5: Fees and Compensation

Compensation

Separate Accounts

The annual compensation for CCA's separately managed accounts is generally as follows:

AUM	Advisory Fee
$0 - $50,000,000	**0.90%**
$50,000,000+	**0.70%**

Notwithstanding the foregoing fee schedule, CCA requires a minimum Fee of $20,000 per annum from each Client, payable in quarterly installments.

The annual compensation for CCA's sub-advised relationships ranges from 0.25% to 1.00% of assets under management.

Notwithstanding anything to the contrary, CCA's reserves the right to negotiate its compensation based on various criteria, including, but not limited to, the size of the aggregate party portfolio size and pre-existing relationships with clients. Certain clients may pay more or less than others depending on the amount of assets, type of portfolio, or the time involved, the degree of responsibility assumed, the complexity of the engagement, special skills needed to solve problems, the application of experience and knowledge of the client's situation.

Accounts which are introduced to CCA through third-party referral arrangements may experience higher fees than those referenced above. Please see Item 14 below for more information regarding CCA client referral arrangements and fees.

Pooled Investment Vehicles

Annual investment sub-advisory management fees for each insurance fund are charged as a tiered percent per annum of the net asset value of the insurance fund on the first business day of each calendar month based on the total assets managed (please see the Sub-Advisory Agreement for specific per annum fees by asset level).

Calculation and Payment

Separate Accounts

The specific manner in which fees are charged by CCA is established in the client's written agreement with CCA. CCA will generally calculate fees on a quarterly basis, in arrears. Fees will be calculated based on the average daily market value of assets under management during the billing period.

Unless CCA and the client agree that particular assets are specifically excluded from the client's account, compensation will be calculated in arrears on the total market value of all mutual funds, stocks, bonds, cash, and money market positions held in the client's investment account at the end of each calendar quarter.

Clients may elect to be invoiced directly for fees or to authorize CCA to directly debit fees from client accounts.

Advisory fees for the insurance funds are paid monthly in arrears. CCA has contractually agreed to reduce its fees and to reimburse expenses to ensure that the total annual operating expenses (excluding standard trading expenses as described in the Series Supplement) for the insurance fund do not exceed 0.90% of the net asset value of the insurance fund on the first business day of each calendar month.

Other Fees

Separate Accounts

In addition to CCA advisory compensation, clients may incur certain charges imposed by third parties which include the following: brokerage commissions; custodial fees; IRA and qualified retirement fees; cryptocurrency platform and transactions fees (for clients investing in cryptocurrencies), mutual fund fees, including advisory fees and administrative expenses, 12B-1 and sub transfer fees; and other charges required by law.

Advisory compensation earned by CCA is separate and distinct from advisory fees and expenses charged by mutual funds in which client assets may be invested. A complete description of these fees and expenses may be found in each mutual fund prospectus. The client should review all fees charged by mutual funds, CCA and others to fully understand the total amount of fees to be paid by the client.

Pooled Investment Vehicles

Funds are subject to a number of expenses which are ultimately borne by shareholders, including, but not limited to, accounting, shareholder servicing, legal, audit, tax, administrative servicing and other expenses.

Additionally, CCA utilizes certain exchange traded funds and other investment vehicles (“acquired funds) in circumstances in which direct investments in certain securities/markets may be impractical due to high trading costs, minimum required investment allocations, and/or other factors. Fees and expenses charged by acquired funds are separate and distinct from advisory fees and other expenses charged to the funds to which CCA serves as an adviser or sub-adviser. Consequently, to the extent that any fund managed by CCA in acquired funds, shareholders shall be assessed fund level fees and expenses both by the funds managed by CCA and the acquired funds.

Termination of Agreement

Either party has the right to terminate any agreement without penalty with written notice. CCA will earn fees pro-rata through the date of termination. Upon termination of the account, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable.

Item 6: Performance-Based Fees and Side-by-Side Management

Neither CCA nor any of its Supervised Persons (employees) accepts performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

CCA does not use a performance-based fee structure because of the potential conflict of interest. Performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client.

Item 7: Types of Clients

Types of Clients

As described in Item 4, CCA is a registered investment adviser, which provides portfolio management services to high net worth individuals, foundations, charitable organizations, pension and profit sharing plans, trusts, corporations, investment companies registered under the Investment Company of 1940, insurance-dedicated funds and other business entities.

Account Minimums

The minimum separate account size is $5,000,000. Accounts may be aggregated for determining the dollar value of assets. Waivers or exceptions from the minimum account requirement may be granted at the exclusive discretion of CCA.

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

Methods of Analysis

CCA combines a quantitative approach in security analysis with an index methodology to construct portfolios of securities for clients. CCA utilizes databases from several sources as input to its own statistical computer models. This quantitative processing produces security portfolio recommendations that capture specific market level risk exposures of common and customized indices. CCA may employ fundamental, technical and behavioral data in its computer models. CCA portfolios tend to be long-term purchases, with limited turnover.

CCA's approach is not designed to capture idiosyncratic differences between companies and therefore do not provide advantage in security selection. CCA's process relies on the quality of the data it obtains, the quality of the statistical models it builds and the firm's ability to execute purchases at prices that approximate those modeled.

Separate Account Investment Strategies

The primary strategy employed with client accounts is global asset allocation targeting only liquid securities. The company uses passively managed index funds or attempts to replicate passively managed benchmarks with direct securities to construct client portfolios. Unless otherwise specified by the client, portfolios are globally diversified to control the risk associated with traditional markets. Our strategies broadly fall into two categories:

Core Global Portfolio Strategies

The CCA Global Portfolio is a client-owned separately-managed index portfolio that mirrors the world's allocation of public equity and fixed income securities. CCA makes trade decisions based on a client's specific tax and risk profile. Customized portfolios that CCA offers beyond the traditional CCA Global Portfolio include the CCA Global Dividend Portfolio, the CCA Core Portfolio, the CCA EAFE Portfolio, and Overlay portfolios. The CCA Global Dividend Portfolio provides exposure to a globally diversified portfolio of high dividend paying securities. The CCA Core Portfolio provides exposure to the large and mid-cap companies in the U.S while the CCA EAFE Portfolio provides exposure to the large and mid-cap developed market companies outside the U.S. CCA's Overlay portfolios are used in conjunction with the underlying CCA portfolio strategies listed above to provide downside protection by holding more cash or hedging and/or additional return through the use of margin.

Risk Parity Strategies

The CCA Risk Parity Strategy is a client-owned separately-managed composite portfolio of sub-strategies that represent various asset classes and trading strategies that exhibit equity like returns and risk but provide exposure outside of the major stock indices. Each sub-strategy is scaled in a portfolio construction technique known as "risk parity" such that each sub-strategy represents an equal contribution to the overall risk of the portfolio based on historical risk data as measured by standard deviation. The current sub-strategies employed in this Risk Parity framework are:

- Factor – a market weighted portfolio of global small-capitalization value stocks
- Momentum – a trading strategy of ETFs covering the major global equity and fixed income markets which tracks the top quintile of global securities based on their momentum (determined by price changes)
- Carry – a risk weighted portfolio of high-income producing securities (high yield bonds, emerging market bonds, MLPs, REITs and preferred stocks)
- Inflation – A paired trade of long-term government bonds and commodity gold ETFs
- Volatility – A short VIX strategy that uses VIX options to sell volatility in equity markets

Pooled Investment Vehicle Strategies

CCA Aggressive Return Strategy

The CCA Aggressive Return Strategy attempts to capture the performance of the riskier portion of the domestic and international equity and fixed income markets by employing an investment approach designed to focus on those securities that have the highest expected return sensitivity, as determined by CCA. CCA manages the CCA Aggressive Return Strategy to closely approximate the key characteristics of the top decile (i.e., the 10% of the world's securities by market value that provide the highest expected return sensitivity based on the score). For this purpose, CCA invests in a sampling of securities that, in the aggregate, are selected to provide performance that corresponds generally to the performance of the top decile. The securities in the top decile will change from time to time. As CCA conducts its periodic scoring and ranking of the universe, CCA will modify the CCA Aggressive Return Strategy's holdings accordingly. The mix between equity and fixed income securities is expected to vary significantly from time to time, and it is possible for the CCA Aggressive Return Strategy to be 100% invested in either asset class at any time.

CCA Core Return Strategy

The CCA Core Return Strategy attempts to capture the performance of 90% of the domestic and international equity and fixed income markets by employing an investment approach designed to focus on all securities other than those that have the highest expected return sensitivity, as determined by CCA. CCA manages the CCA Core Return

Strategy to closely approximate the key characteristics of the nine deciles other than the top decile (i.e., the 90% of the world's securities by market value, excluding the 10% that provide the highest expected return sensitivity based on the score). For this purpose, CCA invests in a sampling of securities that, in the aggregate, are selected to provide performance that corresponds generally to the performance of the nine deciles. The securities in the nine deciles will change from time to time. As CCA conducts its periodic scoring and ranking of the universe, CCA will modify the CCA Core Return Strategy's holdings accordingly.

Risk of Loss

Investing in securities involves risk of loss that clients should be prepared to bear.

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks:

- Interest-rate Risk: Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- Market Risk: The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- Inflation Risk: When any type of inflation is present, a dollar next year will not buy as much as a dollar today, because purchasing power is eroding at the rate of inflation.
- Foreign Investment Risk: Foreign investments present certain risks not typically associated with investing in United States securities or property. Such risks include unfavorable currency exchange rate developments, restrictions on repatriation of investment income and capital, imposition of exchange control regulation by the United States or foreign governments, confiscatory taxation and economic or political instability in foreign nations. In addition, there may be less publicly available information about certain non-U.S. companies than would be the case for comparable companies in the United States, and certain non-U.S. companies may not be subject to accounting, auditing and financial reporting standards and requirements comparable to or as uniform as those of U.S. companies.
- Exchange Rate Risk: The value of clients' positions in non-U.S. investments will fluctuate with U.S. dollar exchange rates as well as the price changes of the investments in the various local markets and currencies. In such cases, an increase in the value of the U.S. dollar compared to the other currencies will reduce the effect of any increases and magnify the effect of any

decreases in the prices of clients' investments in their local markets and may result in losses to client accounts.

- Reinvestment Risk: This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- Business Risk: These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- Liquidity Risk: Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not. Additionally, some investments may become illiquid due to changing market conditions and/or other factors and there is no assurance that any particular investment may be liquid at any particular point in time.
- Financial Risk: Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.
- Margin Account Risk: A margin transaction occurs when an investor uses borrowed assets to purchase financial instruments. The effect of purchasing a security using margin is to magnify any gains or losses sustained by the purchase of the financial instruments on margin. If the securities in a margin account decline in value, the brokerage firm may issue a margin call and/or sell securities or other assets in the client's accounts. Additionally, many broker-dealers may increase their maintenance margin requirements at any time without advance written notice.
- Options Risks: The seller (writer) of a call option which is covered (i.e., the writer holds the underlying security) assumes the risk of a decline in the market price of the underlying security below the purchase price of the underlying security less the premium received, and gives up the opportunity for gain on the underlying security above the exercise price of the option. The seller of an uncovered call option assumes the risk of a theoretically unlimited increase in the market price of the underlying security above the exercise price of the option. The securities necessary to satisfy the exercise of an uncovered call option may be unavailable for purchase, except at much higher prices, thereby reducing or eliminating the value of the premium. Purchasing securities to cover the exercise of an uncovered call option can cause the price of the securities to increase, thereby exacerbating the loss. The buyer of a call option

assumes the risk of losing its entire premium investment in the call option. Further, as with other derivative investments, over-the-counter options are subject to counterparty risk.

CCA reserves the right to advise clients on any other type of investment that it deems appropriate based on the client's stated goals and objectives. CCA may also provide advice on any type of investment held in a client's portfolio at the inception of the advisory relationship or on any investment on which the client requests advice.

Additional Risk Considerations Relating to Cryptocurrency Investments

Investments in cryptocurrencies are highly speculative and involve high degrees of risk, including the risk of a partial or total loss of invested funds. Cryptocurrencies are not suitable for any client who cannot afford the loss of the entire investment.

Cryptocurrency is a digital representation of value that functions as a medium of exchange, a unit of account, or a store of value, but it does not have legal tender status. Cryptocurrencies are sometimes exchanged for U.S. dollars or other currencies around the world, but they are not generally backed or supported by any government or central bank. Their value is completely derived by market forces of supply and demand, and they are more volatile than traditional currencies. The value of cryptocurrency may be derived from the continued willingness of market participants to exchange fiat currency for cryptocurrency, which may result in the potential for permanent and total loss of value of a particular cryptocurrency should the market for that cryptocurrency disappear.

There is significant uncertainty regarding the regulatory treatment of crypto assets in the U.S. As a result, many crypto assets are either unregulated or in the early stages of regulation by U.S. federal and state governments and self-regulatory organizations. As crypto assets have grown in popularity, certain U.S. agencies, such as the SEC, the Financial Crimes Enforcement Network and other offices within the U.S. Treasury Department, and the Commodity Futures Trading Commission ("CFTC"), have begun to examine crypto assets and entities that operate within the crypto asset ecosystem in depth. Legislative and regulatory changes or actions at the state, federal, or international level may adversely affect the use, transfer, exchange, and value of cryptocurrency.

Cryptocurrencies are not covered by either FDIC or SIPC insurance.

Purchasing cryptocurrencies comes with a number of risks, including volatile market price swings or flash crashes, market manipulation, and cybersecurity risks. A cybersecurity breach with respect to the entities involved in the recording and transfer of crypto assets in turn could in turn could cause a client account and/or CCA to incur regulatory penalties, reputational damage, and additional compliance costs associated with corrective measures, and/or financial loss.

In addition, cryptocurrency markets and exchanges are not regulated with the same controls or customer protections available in equity, option, futures, or foreign exchange investing. There is no assurance that a person who accepts a cryptocurrency as payment today will continue to do so in the future. Cryptocurrency and crypto asset exchanges have been closed due to fraud, failure, security breaches, and legal noncompliance. Client assets held on a crypto asset exchange that shuts down may be lost.

While CCA conducted research into the legitimacy of the cryptocurrency it plans to recommend, including the proposed platform, there is no guarantee that such research will prevent or minimize risks to client accounts. The features, functions, characteristics, operation, use and other properties of the specific cryptocurrency may be complex, technical, or difficult to understand or properly evaluate. The cryptocurrency may be vulnerable to attacks on the security, integrity or operation, including attacks using computing power sufficient to overwhelm the normal operation of the cryptocurrency's blockchain or other underlying technology. Some cryptocurrency transactions will be deemed to be made when recorded on a public ledger, which is not necessarily the date or time that a transaction may have been initiated.

Any individual cryptocurrency may change or otherwise cease to operate as expected due to changes made to its underlying technology, changes made using its underlying technology, or changes resulting from an attack. These changes may include, without limitation, a "fork," a "rollback," an "airdrop," or a "bootstrap." Such changes may dilute the value of an existing cryptocurrency position and/or distribute the value of an existing cryptocurrency position to another cryptocurrency. There is no guarantee that any individual cryptocurrency custodian will support any of these changes. Any cryptocurrency may be cancelled, lost or double spent, or otherwise lose all or most of their value, due to forks, rollbacks, attacks, or failures to operate as intended. The nature of cryptocurrency means that any technological difficulties experienced by a custodian may prevent the access of your cryptocurrency. Any insurance or surety bonds maintained by a custodian holding cryptocurrencies for the benefit of its customers may not be sufficient to cover all losses incurred by customers.

Cryptocurrencies are not appropriate using funds drawn from retirement savings, student loans, mortgages, emergency funds, or funds set aside for other specific purposes. Cryptocurrency trading can lead to large and immediate financial losses. The volatility and unpredictability of the price of cryptocurrency relative to fiat currency may result in significant loss over a short period of time.

Under certain market conditions, it may be difficult or impossible to liquidate a position quickly at a reasonable price. This can occur, for example, when the market for a particular cryptocurrency suddenly drops, or if trading is halted due to recent news events, unusual trading activity, or changes in the underlying cryptocurrency system.

The greater the volatility of a particular cryptocurrency, the greater the likelihood that problems may be encountered in executing a transaction. In addition to normal market risks, a client may experience losses due to one or more of the following: system failures, hardware failures, software failures, network connectivity disruptions, and data corruption.

Item 9: Disciplinary Information

CCA and its employees have not been involved in legal or disciplinary events related to past or present investment clients.

Item 10: Other Financial Industry Activities and Affiliations

Financial Industry Activities

CCA is not registered as a broker-dealer.

Neither CCA nor any of its management persons is registered as (or associated with) a futures commissions merchant, commodity pool operator, or a commodity trading adviser.

Other Investment Advisers

CCA does not recommend or select other investment advisers for its clients.

Insurance Company

The Checchi Family, through three legal sperate entities, owns 49% of Fergus Reinsurance Limited ("Fergus"), a Bermuda-based reinsurance company. Adam Checchi serves on the Board of Directors of Fergus. Further, as a result of the aforementioned ownership interest and Mr. Checchi's service on the Board of Directors, CCA and related entities have certain controls over key insurance underwriting decisions, investment decisions and operating decisions for the company.

CCA also serves as the investment adviser for a portfolio linked the Series C Preferred Shares ("Series C Shares") issued by Fergus and for which Fergus has been engaged to manage insurance risks.

Certain clients have chosen, or may choose in the future, to independently invest in the Series C shares. It is important to note that, in such instances, CCA's relationship with Fergus could result in a conflict of interest with a client's investment. Specifically, should a dispute arise between Fergus and shareholders in the Series C Cell, a conflict could arise between the Checchi Family's financial interests in Fergus and those of Series C Cell shareholders.

CCA's service as the investment adviser to the Series C Cell may also create a conflict of interest. Specifically, to the extent that CCA introduces the Series C Cell to other CCA clients and such clients choose to place an investment, CCA earns additional advisory fees on the increased assets in the Series C Cell.

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

Code of Ethics

CCA employees must comply with a Code of Ethics. The Code describes the Firms' high standard of business conduct, and fiduciary duty to its clients. The Code's key provisions include:

- Statement of General Principles
- Policy on and reporting of Personal Securities Transactions
- A prohibition on Insider Trading
- Restrictions on the acceptance of significant gifts
- Procedures to detect and deter misconduct and violations
- Requirement to maintain confidentiality of client information
- Monitoring of political contributions
- Policy on gifts and entertainment

Delia T. Mupita, Chief Compliance Officer, reviews all employee trades each quarter. Her trades are reviewed by another employee. These reviews ensure that personal trading does not affect the markets, and that clients of CCA receive preferential treatment.

All employees of CCA must acknowledge the terms of the Code of Ethics at least annually.

Clients and prospective clients can obtain a copy of CCA's Code of Ethics by contacting the Chief Compliance Officer, Delia T. Mupita, at 310-432-0010.

Participation or Interest in Client Transactions

With the exceptions of recommendations relating to purchases of affiliated pooled investment vehicles and as discussed below, neither CCA nor its employees recommend to clients or buy or sell for client accounts, securities in which they have a material financial interest.

It is important to note that, from time to time, the Checchi Family may introduce personal co-investment opportunities to select clients, at their sole discretion, with whom members of the family and/or CCA have material relationships. Any such investment is not considered a product or service offering of CCA, nor is CCA obligated to introduce any specific client to a family co-investment opportunity. It is the sole responsibility of clients who are considering participation in any Checchi Family co-investment opportunity to consult appropriate tax, legal, and other financial professionals to determine the suitability of any such investment in light of their specific circumstances.

To the extent that a client chooses to pursue a co-investment opportunity introduced by the Checchi Family, such client should be aware that conflicts of interest may exist. The

Checchi Family may invest in multiple levels of a company's capital structure, which could give rise to conflicts of interest to the extent that capital structure interests diverge. Additionally, to the extent that CCA serves as the adviser to a portfolio purchased through an outside investment and introduces that outside investment to existing clients, it should be noted that CCA will generally earn additional advisory fees on investments placed by those clients.

Participation or Interest in Client Transactions – Personal Securities Transactions

CCA and its employees may buy or sell securities identical to those recommended to clients for their personal accounts. These trades may not occur ahead of client trades. The Code of Ethics, described above, is designed to assure that the personal securities transactions, activities and interests of the employees of CCA 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. Under the Code certain classes of securities have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of CCA's clients. In addition, the Code requires pre-clearance of many transactions, and restricts trading in close proximity to client trading activity. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee. Employee trading is continually monitored under the Code of Ethics, and to reasonably prevent conflicts of interest between CCA and its clients.

Participation or Interest in Client Transactions – Aggregation

CCA's employees, who are clients of the firm, may trade in the same securities with client accounts on an aggregated basis.

Item 12: Brokerage Practices

Research and Other Soft Dollar Benefits

CCA does not receive soft dollar benefits other than execution from broker/dealers in connection with client securities transactions. See disclosure below in "Directed Brokerage – Other Economic Benefits".

Brokerage for Client Referrals

CCA does not direct utilize brokerage transactions to compensate brokers for client referrals. As described more fully in Item 14 below, CCA has entered into a cash referral agreement with E-Trade, which is a registered broker-dealer.

Directed Brokerage

If the client requests CCA to arrange for the execution of securities brokerage transactions for the client's account, CCA shall direct such transactions through broker-dealers that CCA reasonably believes will provide best execution. CCA shall periodically and systematically review its policies and procedures regarding recommending broker-dealers to its client in light of its duty to obtain best execution.

CCA generally recommends that clients establish institutional brokerage accounts with Charles Schwab & Co., Inc. (Schwab) or Fidelity Investments, LLC (Fidelity), both registered broker-dealers and members of the Securities Investor Protection Corporation (SIPC), to maintain custody of clients' assets and to effect trades for their accounts.

Directed Brokerage – Other Economic Benefits

CCA is independently owned and operated and not affiliated with any broker-dealer. However, CCA does utilize third-party broker-dealers to access institutional trading and custody services on its clients' behalf, which are typically not available to retail investors. These services generally are available to independent investment advisers on an unsolicited basis, at no charge to them so long as a total of at least $10 million of the adviser's clients' assets is maintained in accounts at the broker-dealer, and are not otherwise contingent upon CCA committing to the broker-dealer any specific amount of business (assets in custody or trading). Brokerage services include brokerage, custody, research, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

For CCA's client accounts maintained in its custody, Schwab and Fidelity generally do not charge separately for custody but are compensated by account holders through commissions or other transaction-related fees for securities trades that are executed through Schwab or Fidelity, or that settle into Schwab or Fidelity accounts.

Clients may come to CCA with an existing brokerage relationship and direct CCA to execute their trades through that broker. CCA retains the right not to trade with a particular broker/dealer. Clients normally negotiate their commission rate directly with their broker. CCA will not seek better execution services or prices from other brokers or dealers and as a result, client could pay higher commissions, other transaction costs, greater spreads, or receive less favorable net prices on transactions for client's account than would otherwise be the case. If a client does not have an existing relationship with a broker, CCA may suggest the use of and request the client to authorize discretion on an account established through a variety of brokerage firms.

Trade Aggregation

CCA typically aggregates trades for multiple accounts. Orders for the same security entered on behalf of more than one client will generally be aggregated in the best interests of all participating clients. If the order is filled at different prices during the day, the prices are averaged for the day so that all participating accounts receive the same price. If an order has not been filled completely so that there are not enough shares to allocate among all the clients equally, shares will be allocated on a pro rata basis, based on transaction value across accounts.

CCA's allocation procedure seeks to be fair and equitable to all clients with no particular group or client(s) being favored or disfavored over any other clients.

Accounts for CCA's employees, who are clients of the firm, may be included in a block trade with client accounts.

Item 13: Review of Accounts

Reviews

Adam D. Checchi, Managing Member, is the primary Portfolio Manager. Mr. Checchi and his team have the responsibility to manage the portfolio in accordance with the client's investment objectives and constraints. This management process includes on-going oversight of the portfolio's investments, buying and selling securities, and communication with clients. Each account's securities positions are generally rebalanced when significant model changes occur, with cash balances re-assessed on a bi-weekly basis. More frequent reviews may be conducted on an as-needed and/or predetermined basis as agreed between the client and CCA.

Review Triggers

Other conditions that may trigger a review are material market events, or changes in political or economic conditions, tax laws, and changes in a client's personal situation.

Reporting

Each month, the broker-dealer provides clients with an account statement for each client account, which may include individual holdings, cost basis information, deposits and withdrawals, securities transactions, accrued income, dividends, performance and fees, if applicable. In addition to the monthly report, the broker-dealer provides clients with trade confirmations for each position bought and sold.

CCA also provides clients with a quarterly report including an account appraisal that identifies the current status of the portfolio. A performance summary is also provided for the portfolio during the most recent quarter and year-to-date, as well as a performance snapshot of the investable universe year-to-date for comparison purposes.

Client meetings are encouraged and are scheduled as specific situations dictate.

Item 14: Client Referrals and Other Compensation

Compensation – Economic Benefits

As described in Item 12, CCA may recommend that clients establish brokerage accounts with Schwab, a FINRA-registered broker-dealer, member SIPC, to maintain custody of clients' assets and to effect trades for their accounts. Although CCA may recommend that clients establish accounts at certain broker-dealers, it is the client's decision to use a particular broker-dealer. CCA is independently owned and operated and not affiliated with any broker-dealer.

Third-party broker-dealers, including Schwab, make available to CCA other products and services that benefit CCA but may not benefit its clients' accounts. Some of these other products and services assist CCA in managing and administering clients' accounts. These include software and other technology that provide access to client account data (such as trade confirmations and account statements); facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts); provide research, pricing information and other market data; facilitate payment of CCA's fees from its clients' accounts; and assist with back-office functions, record keeping and client reporting. Many of these services generally may be used to service all or a substantial number of CCA's accounts, including accounts not maintained at the broker-dealer.

Third-party broker dealers, including Schwab, also make available to CCA other services intended to help CCA manage and further develop its business enterprise. These services may include consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, and marketing. In addition, the broker-dealer may make available, arrange and/or pay for these types of services rendered to CCA by independent third parties. The broker-dealer 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 CCA. CCA endeavors to act in its clients' best interests. CCA's recommendation that clients maintain their assets in accounts at a particular broker-dealer may be based in part on the benefit to CCA of 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 the broker-dealer, which may create a potential conflict of interest.

Compensation – Client Referrals

CCA may enter into written arrangements to pay cash referral fees to individuals or companies (solicitors) who refer prospective clients to the Firm. In these cases, there will be a written agreement between CCA and the solicitors, which clearly defines the duties and responsibilities of the solicitor under this arrangement. In addition, each solicitor is required to provide a written disclosure document, which explains to the prospective client the terms under which the solicitor is working with CCA and the fact that the solicitor is being compensated for the referral activities. The solicitor is also required to furnish a copy of CCA's written disclosure document to the prospective client and obtain a written acknowledgement from the client that both the solicitor's and CCA's disclosure documents have been received.

CCA currently maintains referral agreements with certain internal employees responsible for, among other duties, client development. Pursuant to these arrangements, CCA may base part or all of an employee's compensation on client asset acquisition and/or retention. Under no circumstances will a client whose account is considered in determining an employee's variable compensation be charged higher advisory fees solely as a result of such variable compensation to the employee.

CCA also currently maintains a referral arrangement with E*TRADE Securities LLC ("E*TRADE"), a third party entity unaffiliated with CCA. E*TRADE is compensated based upon a percentage of the account assets under management, which may range from ten

(10) to twenty-three (23) basis points depending upon the size of the account. The Adviser may also be required to remit a flat program participation fee to E*TRADE on an annual basis if variable compensation for all referrals made to the Adviser does not exceed contractual thresholds. Accounts obtained by CCA pursuant to the written referral agreement with E*TRADE may pay advisory fees which are higher than those charged to clients who are acquired through other means. Depending upon the size of an individual account under management, the advisory fee differential attributable this written referral agreement may range up to twenty-five (25) basis points of the account's assets under management.

Item 15: Custody

Custody – Fee Debiting

Clients may authorize CCA (in the client agreement) to debit fees directly from the client's account at the broker dealer, bank or other qualified custodian (custodian). Client investment assets will be held with a custodian agreed upon by the client and CCA. The custodian is advised in writing of the limitation of CCA's access to the account. The custodian sends a statement to the client, at least quarterly, indicating all amounts disbursed from the account including the amount of advisory fees paid directly to CCA.

Custody – Account Statements

As described in Item 13, clients receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains client's investment assets. Clients are urged to carefully review such statements and compare such official custodial records to the account statements or other reports that CCA provides. CCA statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Item 16: Investment Discretion

Discretionary Authority for Trading and Limited Power of Attorney

Through the investment management agreement, CCA may accept limited power of attorney to act on a discretionary basis on behalf of clients. A limited power of attorney allows CCA to execute trades on behalf of clients.

When such limited powers exist between CCA and the client, CCA has the authority to determine, without obtaining specific client consent, both the amount and type of securities to be bought to satisfy client account objectives. Additionally, CCA may accept any reasonable limitation or restriction to such authority on the account placed by the client. All limitations and restrictions placed on accounts must be presented to CCA in writing.

Item 17: Voting Client Securities

CCA may vote proxies for securities over which it maintains discretionary authority consistent with its proxy voting policy.

Upon execution of the client Agreement, the client elects to:

- Assign the responsibility for voting all proxies solicited by issuers of securities held in the portfolio to CCA, or
- Retain the responsibility for voting all proxies solicited by issuers of securities held in the portfolio. See disclosures above regarding proxies voted by clients.

When the responsibility to vote proxies has been assigned to CCA, CCA engages Institutional Shareholders Services (ISS) to vote proxies on their behalf.

Notwithstanding anything herein to the contrary, from time to time there may be situations where CCA may determine not to vote certain proxies due to complexities or logistical issues, or because CCA otherwise determines it is in its clients' best interests to abstain.

Clients may direct CCA's vote; direction must be received in writing.

Clients may contact Delia T. Mupita, Chief Compliance Officer at CCA at 310-432-0010 for information about CCA's Proxy policies. Clients may also request information about how CCA voted any proxies on behalf of their account(s).

Item 18: Financial Information

CCA has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.

CCA is not required to provide a balance sheet; CCA does not require prepayment of fees of more than $1,200 per client, **and** six months or more in advance.

CHECCHI

Form ADV Part 2B

Investment Adviser Brochure Supplement

Supervisor: Adam D. Checchi

Supervisor of:
Kathryn D. Checchi
Samuel T. Pfister

Haiyang Zhang

Robert Robinson
Robert Bodner
Kim Maresh Petersen

March 31, 2024

This brochure supplement provides information about the Firm's Supervised Persons that supplements the Checchi Capital Advisers, LLC's brochure. You should have received a copy of that brochure. Please contact Adam Checchi, Managing Member if you did not receive Checchi Capital Advisers, LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about the Firm's Supervised Persons is also available on the SEC's website at www.adviserinfo.sec.gov. You may search this site using a unique identifying number, known as a CRD number for each Supervised Person.

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310-432-0010
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Educational Background and Business Experience

Education and Business Background

CCA requires that advisers in its employ have a bachelor's degree and work experience that demonstrates their aptitude for investment management. In addition, advisers in its employ may have further coursework demonstrating knowledge of financial planning and tax planning. Examples of acceptable coursework include: an MBA, a CFP®, a CFA, a ChFC, JD, CTFA, EA or CPA.

Supervisor
Adam D. Checchi
CRD # 4697959

Adam has been the Managing Partner of CCA since its inception in 2007, supervising and coordinating all aspects of operations, trade execution and marketing, with specific focus on product development and direct sales. Prior to CCA, his investment experience includes: Investment Management and Private Equity Consultant from 2005 to 2007, Associate, Investment Banking Division, Goldman Sachs and Co. from 2003 to 2005, and Senior Analyst, Venture Capital, Entertainment Media Ventures, LLC from 2000 to 2001.

Adam is a 1999 graduate of Harvard University. He received a Master's of Business Administration from Harvard Business School in 2003 and was recognized as a Baker Scholar. He was also the recipient of the Loeb Award given for the most outstanding performance in finance. Adam holds the NASAA Series 65. Adam was born in 1977.

Supervised Persons
Kathryn Checchi
CRD #5320767

Kathy was and continues to be the Manager of Checchi Capital, LLC, since 2005 and is a Principal, focusing on asset management and tax strategy for Checchi Family Interests from 1992 to 2005.

Kathy holds a BA from University of California, San Diego, an MA from Harvard University, and a JD from Georgetown University. She is a member of the District of Columbia and Texas Bars and holds the NASAA Series 65. Kathy was born in 1950.

Samuel T. Pfister
CRD # 6463204

As Director of Engineering, Sam develops and maintains proprietary statistical software tools to enable an efficient, accurate and customizable portfolio construction process. He also oversees the design and maintenance of the firm’s data and trading software systems.

Before joining CCA, Sam was a postdoctoral researcher at the California Institute of Technology and a technical lead in the government-sponsored DARPA Grand Challenge autonomous vehicle competition. Sam was a doctoral student at Caltech from 2000 to 2006, earning his Ph.D. for development of algorithms to enable robust statistical sensor processing in robotic applications. From 2003 to 2004, Sam took time away from graduate school to work on the Mars Exploration Rover mission run by NASA's Jet Propulsion Laboratory. During operations, he developed tools and techniques to more accurately model uncertainty in the state of the rovers to reduce risk and improve overall operational efficiency.

Sam received a Bachelor's of Science degree from Harvard University in 1999. He received a Master's of Science degree in 2001 and a Ph.D. in Mechanical Engineering in 2006 from the California Institute of Technology. Sam was born in 1977.

Haiyang Zhang
CRD # 5568795

As Chief Operating Officer, Haiyang oversees strategic planning, sales and marketing, and key partnerships at CCA. Haiyang has over 10 years of experience in the financial industry, specializing in advice for ultra-high-net-worth clients.

Previously, Haiyang was the Director of Marketing and Relationship Management at CCA, where he managed product marketing, firm branding, and client relationships. Prior to joining CCA, Haiyang worked in Capital Advisory at J.P. Morgan Private Bank in Los Angeles, where he managed the $1bn+ lending portfolio and performed risk and credit analysis to deliver customized financing solutions for clients. Haiyang started his career at J.P. Morgan Private Bank focusing on security analysis and portfolio allocation for individual investors, foundations and private investment companies. Haiyang is currently the Director of Financial Literacy and Senior Programs at Minds Matter Los Angeles, an educational non-profit helping high-achieving students from low-income families prepare for college.

Haiyang received a Bachelor's degree with honors from Claremont McKenna College in Philosophy, Politics and Economics. Haiyang holds the Series 7, Series 63 and Series 65 securities licenses. Haiyang was born in 1985.

Robert Robinson
CRD #6386867

As a Managing Director at CCA, Bob focuses on helping clients and their families develop customized solutions as a fiduciary.

Bob has extensive experience in investment management, business development, real estate, and lending. Prior to joining CCA, Bob joined Silicon Valley Private Bank after successful stints at Oppenheimer and BNY Mellon, where he provided investment management and wealth and estate planning to successful entrepreneurs, family offices, corporate plans, endowments, and foundations. Bob also previously served as Managing Director at the Welton Investment Corporation, an alternative investment manager specializing in managed futures, currency, and global macro strategies. Bob began his career as Vice President of West Coast Wire & Steel, a family-owned company in Riverside, CA.

Bob is a graduate of the University of California, Los Angeles, and is very active in several alumni and mentor programs where he provides mentorship to UCLA athletes and students in the Sharpe Fellowship Program through the UCLA Economics department. Bob was born in 1962.

Robert Bodner
CRD #7589901

Robby is a Vice President of Business Development. Prior to joining CCA, Robby was a full-time student in the MBA Program at USC's Marshall School of Business. During his MBA, he worked at Green Harvest Asset Management concentrating on tax-loss harvesting strategies for high-net-worth individuals. He also spent time at Thames Capital Management, an investment management firm specializing in absolute return long/short equity strategies. Robby previously spent five years working in the Sports & Entertainment industry at Creative Artist Agency and Endeavor. He was responsible for working across brand partnerships for talent as well as properties such as UFC, The Masters, PGA Tour, and IMG Academy.

Robby also holds a Bachelor of Science in Finance from Syracuse University as well as his Series 65 license. Robby was born in 1994.

Kim Maresh Petersen
CRD #2766276

As Managing Director at CCA, Kim specializes in advising CEOs, business owners and entrepreneurs in Houston and greater Texas.

Prior to joining CCA, Kim worked with early-stage venture capital firms, advising portfolio company CEOs on social impact, investor relations, and fundraising strategies. Previously, Kim was Managing Director at J.P. Morgan Chase in Houston. During her 21-year career at the Firm she advised both corporate and private client relationships. Most of her career there she advised ultra-high net worth families, business owners and C-suite executives on investments, wealth planning, philanthropic and credit strategies. Kim built and managed several business verticals within the Firm, including specialized wealth advisory services for CEOs and business owners.

Kim continues to mentor young entrepreneurs and is very active in the Houston community. She currently serves on the Boards of Directors of EDEN Grow Systems; Feed the Future Foundation; The Children's Museum of Houston; and The University of Texas Chancellor's Council Executive Committee. She also served on River Oaks Baptist

School Board of Directors, Executive Committee, Finance (Chair) and Advancement Committees, and the Duchesne Academy Investment Committee. Kim graduated from The University of Texas at Austin with a BBA in Finance and holds her Series 65 license. Kim was born in 1967.

Disciplinary Information

Neither CCA nor any Supervised Persons have been involved in any activities resulting in a disciplinary disclosure.

Other Business Activities

Disclosure on Outside Business Activities is provided in Form ADV Part 2A Item 10 – Other Financial Industry Activities and Affiliations. These Outside Business Activities do not create a material conflict of interest with clients.

As disclosed in Form ADV Part 2A Item 6 – Performance-based Fees and Side-by-Side Management, neither CCA nor any supervised persons receive commissions, bonuses or other compensation based on the sale of securities or other investment products.

Additional Compensation

No Supervised Person receives any economic benefit outside of regular salaries or bonuses related to amount of sales, client referrals or new accounts, except as described in Form ADV Part 2A, Item 12.

Supervision

Adam D. Checchi, Managing Partner, supervises all persons named in this Form ADV Part 2 Investment Adviser Brochure Supplement. All supervised persons are in one location, the principal offices of CCA. Staff, investment, marketing, and ad hoc meetings are held at this location on a regular basis. Client reports and e-mails are reviewed and discussed regularly. Trading for client accounts is planned and discussed prior to execution. Mr. Checchi may be reached at 310-432-0010.