

**Quint Capital Management LLC
(CRD 26586)**

**230 Park Avenue, Suite 908
New York, NY 10169-0499
(212) 682 5090**

**Firm Brochure as of March 2020
(Part 2A of Form ADV)**

This brochure provides information concerning the qualifications and business practices of Quint Capital Management LLC, a Registered Investment Advisor. Please be advised that the name Quint Capital Management LLC is a DBA (Doing Business As) that also utilizes the name Legacy Trust Advisors. The original name of this entity, organized in 1989, was Legacy Trust Advisors. As a result of its acquisition in 2015 by QCAP Holdings LLC, owned exclusively by Alexander N. Quint (CRD 1012135), the name Quint Capital Management LLC has also since been utilized.

Therefore, throughout this document the names Quint Capital Management LLC, QCM, Legacy Trust Advisors and Legacy may appear in various sections and will each refer to the same entity interchangeably. If you have any questions about the contents of this brochure, please contact Alexander N. Quint at (212) 682 5090.

Additional information about Quint Capital Management and Legacy Trust Advisors also is available on the SEC's website at www.adviserinfo.sec.gov.

Please check www.finra.org for more information concerning Quint Capital Corporation, a FINRA-Registered Broker-Dealer, Quint Capital Management LLC and Alexander N. Quint (CRD 1012135).

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.

Registration as an Investment Advisor does not imply a certain level of skill or training. Please use many factors and sources in determining a suitable Advisor.

Quint Capital Management is registered or seeking registration in the following states: New York, New Jersey, Maryland, California, Connecticut, Florida and Pennsylvania.

MATERIAL CHANGES

ANNUAL UPDATE

The Material Changes section of this brochure will be updated annually, or when material changes occur since the previous release of the Firm Brochure.

MATERIAL CHANGES SINCE THE LAST UPDATE

The firm has modified its fee structure; however, this does not affect existing clients.

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4. FIRM DESCRIPTION: ADVISORY

GENERAL

Legacy Trust Advisors (Legacy) is the investment advisory arm of Champion Capital Corporation, founded in 1989. Champion Capital Corporation is now Quint Capital Corporation.

Legacy provides fee-only investment advice with a focus on helping clients achieve personal investment goals.

Our clients include individuals, high net worth individuals, pensions and profit-sharing plans, corporations and other (trusts).

Client goals often include: determination of financial objectives, identification of financial problems, cash flow management, tax planning, insurance review, investment management, education funding, retirement planning, and estate planning. Legacy aims to help you achieve your goals by assisting with the investment aspects of these goals in a professional and workmanlike manner.

Legacy plays well with other firms and advisors to help clients achieve their objectives. See the Other Financial Industry Activities and Affiliations Section for details.

Investment management services are offered on a discretionary or, occasionally, on a partially discretionary or non-discretionary basis. Legacy does not act as a custodian of client assets. Client assets are held in the client's name by independent custodians including Raymond James and others.

Legacy places trades for clients under a limited power of attorney. The client always maintains asset control.

Legacy may directly or indirectly compensate third parties for client referrals.

Legacy offers a wrap-fee program. Please refer to the Appendix 1 Wrap Fee Program Brochure.

PRINCIPAL OWNERS

The owner of the company is QCAP Holdings, LLC. QCAP Holdings, LLC (a New York LLC) is owned entirely by Alexander N. Quint who is also a registered representative with Quint Capital Corporation. QCAP Holdings, LLC purchased Champion Capital Corporation and Champion Capital Management LLC in 2015.

TYPES OF ADVISORY SERVICES

Legacy provides investment supervisory services, also known as investment management or asset management services. Services include: Portfolio Management, Pension Consulting services, and Selection of other advisers (including private fund managers).

Legacy provides clients with specific investment recommendations to achieve a suitable investment plan designed to meet short and long-term objectives. In addition, Legacy manages, or oversees the management of, clients' investment portfolios based on each client's individual needs. Discretionary investment management services are guided by the stated objectives of a client (e.g., principal preservation, maximizing capital appreciation, current income, long-term growth or growth and income). The investment strategy for each client is sometimes summarized in an "Investment Policy Statement" (IPS) agreed to with the client and updated as needed.

An approved Advisory Representative of Legacy interviews each client (usually in person but, occasionally, by telephone) to determine individual needs based on criteria such as age, investment experience, current financial position, personal goals and objectives, and risk tolerance.

As of December 2018, Legacy manages approximately \$60,000,000 in assets for approximately 38 clients. Approximately \$60,000,000 is managed on a discretionary basis, and approximately \$0 is managed on a non-discretionary basis.

TAILORED RELATIONSHIPS

Clients communicate financial objectives by completing Client Profile and through periodic review and advisory meetings and other correspondence. Objectives are tracked via written meeting agendas with each client.

Clients may designate in an Investment Policy Statement, securities in the account which may not be sold, and/or specify restrictions on investing in certain securities or types of securities.

5. FEES AND COMPENSATION

DESCRIPTION

Initial fees (Strategic Portfolio Design Fee – SPD) to evaluate a client's current investment position and recommend suitable changes in portfolio mix and emphasis may be charged separately from ongoing fees for portfolio management. A negotiable initial fee is proposed at Legacy's determination of a fair value generally based on an estimate of the time required to provide the appropriate level of service and the level of complexity anticipated. Initial fees range from .5% to 1.5% of AUM.

Normal hourly rates, upon which estimates are based, range \$100 to \$300 per hour.

Quarterly fees for portfolio management are usually based on a percentage of the value of the investments under management; however, such services may also be provided for a fixed retainer payable quarterly in advance.

The standard fee is up to 50 basis points per quarter or Two Percent (2%) per year. This applies to all services including any sub-advisory fees. Total fees cannot exceed three percent (3%) of assets.

Exceptions to the established fee schedule may be negotiated, on an individual basis, based on certain criteria including relationship history, type of assets, potential account size, expected activities, volume of transactions or a requirement for more or less services.

In order to encourage interaction with our clients, there is no limit placed on the amount of professional time made available for portfolio related or general financial discussions. Legacy may bill separately for additional services, particularly where research, further analysis, projections, tax preparation, etc. are required. One or more of the following billing methods may be recommended, depending on the services:

- Hourly charges at standard rates (range from \$100 to \$300 per hour)
- Hourly charges with a firm estimate in advance which are billed and deducted from the Client's account, with written consent. However, QCM does not collect fees of \$500 or more and six months in advance.
- Fixed fee

- Quarterly retainer

Fee estimates and billing method are generally provided in advance or in arrears of services being rendered. Please note that lower fees may be available from other sources. Fees should be part of, but not solely, a basis for your investment decision.

QCM participates in Wrap Fee Programs and charges each Client a maximum of 2% annually (.50% quarterly). QCM evaluates annually whether Wrap Fee is in best interest of the Client.

FEE BILLING

Investment management fees are usually billed quarterly (may be in advance or in arrears), based on the value of a client's accounts under management at the end of the preceding quarter.

Fees are generally deducted from the account(s) managed by Legacy. The client must consent in advance to direct debiting of their investment account as per the Engagement Letter for Investment Advisory Services. QCM sends qualified custodian written notice of the amount of the fee to be deducted from the client's account, which itemizes the fee, including any formula used to calculate the fee, time period for the fee, and the amount of asset under management on which the fee is based.

The advance fee for new accounts (when substantial deposits may be received in several installments during the initial quarter), or for existing accounts when unusually large deposits or withdrawals occur during a quarter, may be adjusted on a pro-rata basis. Normally, a pro-rata adjustment is made on the next quarterly invoice, to increase the fee for the period of time during which the substantial deposit was under Legacy's management or supervision during the previous quarter, or to decrease the fee for the period of time during which a substantial withdrawal occurred.

Upon receipt from the client of a written notice terminating Legacy's services, any fees paid more than 60 days in advance for the then-current quarter are refundable, on a pro rata basis. Client has the option to opt-out of the QCM agreement if Form ADV has not been provided within 48 hours prior to execution of the advisory agreement.

OTHER FEES

Custodians may charge transaction fees. These transaction charges are usually small and incidental to the purchase or sale of a security. Legacy does not control or receive any portion of these transaction fees. Supervised persons may accept compensation for the sale of securities and other investment products. However, a supervised person cannot accept both fees and commissions from the same account.

EXPENSE RATIOS

Mutual funds, exchange traded funds (ETFs) and separate account managers (SAMs) generally charge management fees for their services as investment managers. The management fee is called an expense ratio. For example, an expense ratio of 0.50 means that the mutual fund company charges 0.50% per year for its services. These fees are in addition to the fees paid by you to Legacy.

Some mutual funds have various share "classes" with different expense ratios for each class. Legacy does not control or receive any portion of these fees. Larger positions will often be placed into the lowest-cost shares available (sometimes known as "Institutional" or "I" shares) when available and appropriate. A complete explanation of the fees charged by mutual funds and ETFs is contained in the prospectus for each fund. Fees for investment management services provided by other investment managers will be disclosed in such managers' separate account agreement. Performance figures quoted by mutual fund companies in various publications are generally after their fees have been deducted.

PAST DUE ACCOUNTS AND TERMINATION OF AGREEMENT

Legacy reserves the right to stop work on any account that is more than 60 days overdue.

6. PERFORMANCE-BASED FEES

No portion of Legacy's fees is computed on the basis of the capital gains on, or capital appreciation of, the funds or any portion of the funds managed for a client. Legacy 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.

7. TYPES OF CLIENTS

DESCRIPTION

Legacy generally provides wealth management, investment advice and investment management services to individuals, high net worth individuals, pensions and profit-sharing plans, corporations and other (trusts).

Client relationships vary in scope and length of service.

ACCOUNT MINIMUMS

The minimum account size is \$10,000 in assets under management. Clients with assets below the minimum account size may pay a higher percentage rate on their annual fees than the fees paid by clients with greater assets under management.

Legacy has the discretion to waive or reduce the account minimum. Accounts of less than \$10,000 may be set up when the client and the advisor anticipate the client will add additional funds to the accounts bringing the total to \$10,000 within a reasonable time. Other exceptions will apply to employees of Legacy and their relatives, or relatives of existing clients, or other circumstances in Legacy's discretion.

8. METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

METHODS OF ANALYSIS

The main sources of securities information used by Legacy include in-house analysis, third party analysts and other third-party research materials, fund prospectuses and annual reports, financial websites, newspapers and magazines, inspections of corporate activities, corporate and bond rating services, filings with the Securities and Exchange Commission, and company press releases.

Security analysis methods used by Legacy, or by the funds or portfolio managers used by Legacy, may include charting, quantum analysis, fundamental analysis, technical analysis, and cyclical analysis.

INVESTMENT STRATEGIES

The primary investment strategy used on client accounts is strategic asset allocation. For most clients, Legacy uses a combination of mutual funds, ETFs and individual stocks. Both active managers and passive index strategies are considered. Portfolios are often globally diversified among U.S. equities, foreign equities and high-quality fixed income investments in an effort to control risk and depending upon the client's goals and appetite for risk.

Legacy may analyze, evaluate and recommend the initial and continued use of independent individuals, firms and institutions that may provide investment management services for certain of Legacy's clients. Often referred to as "Separate Account Managers" (SAMs) these organizations may serve as sub-advisors

for certain clients' accounts. Legacy will provide overall direction and supervision on such SAM accounts as well as monitor performance and continued adherence to the targeted investment style.

Legacy will only engage in margin transactions with the client's consent. However, margin account balances may occur in an account due to a withdrawal of cash by a client, which must be covered by the sale of securities in the account. On occasion the margin balance may be carried for some period, generally no longer than one month, if postponing a sale to cover the margin balance is deemed to be in the best interest of the client.

The investment strategy for a specific client is based upon the objectives stated by the client during consultations. Each client executes an Investment Policy Statement (IPS) that documents their objectives and their desired investment strategy. The client may change these objectives at any time by modifying their investment objectives on their Client Profile or IPS (if any).

RISK OF LOSS

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 any security, including bonds, ETFs or mutual funds may drop in reaction to tangible and intangible events and conditions independent of the security itself. For example, political, economic and social conditions may trigger market events.
- **Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power will erode at the rate of inflation.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country.

This is also referred to as exchange rate risk.

- **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, an oil company's profits depend on finding oil and then refining it, a lengthy process.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash without creating a significant reduction in the price. 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.
- **Financial Risk:** Excessive borrowing to finance a business' operations generates risk, 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.

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

9. DISCIPLINARY INFORMATION

The firm and its employees have not been involved in any material legal or disciplinary events related to past or present investments or clients.

10. OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

FINANCIAL INDUSTRY ACTIVITIES

Quint Capital Management LLC (AKA Legacy Trust Advisor) is the Registered Investment Advisor owned by QCAP Holdings LLC, that also owns Quint Capital Corporation, a securities Broker-Dealer and member of FINRA and SIPC. Quint Capital Corporation offers private placements to clients from time-to-time.

To summarize, the firms that Quint Capital Management LLC are affiliated with are:

- | | |
|-------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| a. QCAP Holdings LLC | Holding Company for: <ul style="list-style-type: none">• Quint Capital Management (RIA)• Quint Capital Corporation (BD)• Quint Cap (Insurance Agency) |
| b. Quint Capital Corporation | Securities Broker-Dealer (BD) |
| c. Quint Cap | Insurance Agency (not a DBA for Quint Capital Corporation) |

Legacy may recommend other professionals (e.g., lawyers, accountants, insurance agents, etc.). Legacy may receive compensation, either monetary or in-kind, for such referrals. However, the firms listed above may have one or more owners and/or employees in common with Legacy. In the unlikely event other conflicts of interest arise, they are fully disclosed to clients. Legacy has management persons who are registered as representatives of the broker-dealer. Before selecting other Advisors, Legacy ensures the other Advisors are properly licensed.

AFFILIATIONS

Legacy does not have arrangements that are material to its advisory business or its clients with a related person who is an investment company, commodity pool operator, commodity trading adviser or futures commission merchant, banking or thrift institution, accounting firm, law firm, pension consultant, or insurance company – except for Quint’s own insurance group, Quint CAP.

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

CODE OF ETHICS

This Code establishes rules of conduct for all employees of Legacy. The Code is based upon the principle that Legacy and its employees owe a fiduciary duty to Legacy's clients to conduct their affairs, including their personal securities transactions, in such a manner as to avoid (i) serving their own personal interests ahead of clients, (ii) taking inappropriate advantage of their position with the firm and (iii) any actual or potential conflicts of interest or any abuse of their position of trust and responsibility. Conflicts are processed through the CCO and clients will be notified in any financial harm needs to be remediated. Any recommendation to Client regarding an investment for which QCM or an employee has a vested interest is disclosed prior to the completion of a transaction.

Legacy's Code of Ethics is available for review by clients and prospective clients upon request.

No employees of Legacy are Certified Financial Planners™, but CPFs are held to a Code of Ethics outlined by the CFP® Board of Standards. Legacy will disclose all material conflicts of interests to clients prior to investing and at any time of discovery.

Please note that Alex Quint maintains ownership in Quint Miller & Co. which no longer is operating as a viable entity. The Quint Miller & Co. name is used by MSR Partners for branding purposes only. Mr. Quint has no affiliation with MSR Partners, and therefore, no conflict of interest exists.

TRANSACTIONS

It is the expressed policy of Legacy that no principal or employee may purchase or sell any security (other than mutual fund shares) immediately prior to a transaction(s) being implemented for an advisory account, thus preventing such person from benefiting from transactions placed on behalf of advisory accounts.

No principal or employee shall prefer his or her interest to that of an advisory client. In the event that in the same day the same security is transacted for both a member of the firm and for a client, the client will always receive the more favorable price.

PERSONAL TRADING

The Chief Compliance Officer of Legacy is Alexander Quint. He reviews all personal employee trades each quarter.

Personal trading reviews ensure that the personal trading of employees does not affect the markets, and that employees of Legacy do not receive preferential treatment relative to clients. Since most employee trades are relatively small mutual fund trades or exchange-traded fund trades, the trades are not of significant enough value to affect the securities markets.

The firm and any related persons do not act as underwriter or purchaser representative, nor recommend securities to advisory clients.

12. BROKERAGE PRACTICES

SELECTING BROKERAGE FIRMS

Specific custodian recommendations are made to clients based on their need for such services. Legacy recommends custodians based on the proven integrity and financial responsibility of the firm and the best execution of orders at reasonable commission rates. Legacy is also a securities broker/dealer, but does not execute trades generated by its investment advisory division. Legacy requires all clients to designate a broker or dealer to be used for all transactions. Legacy recommends that clients use Raymond James as custodian, in most cases. However, clients are free to choose other custodians.

Legacy personnel may receive fees or commissions from any of these arrangements, which will be updated in the brochure accordingly. Proper disclosures are provided to clients when this will occur.

Legacy may accept client instructions for directing the client's brokerage transactions to a particular broker-dealer. For some clients, Legacy manages assets in clients' companies' Qualified Retirement Plans, where the clients' firm designates the custodial arrangement.

In those cases where a client designates a specific broker-dealer, Legacy may not have authority to negotiate commissions, best execution may not be achieved, and there may be a disparity in commission charges between clients.

BEST EXECUTION

Legacy, as a matter of policy and practice, seeks to obtain best execution for client transactions, i.e., seeking to obtain not necessarily the lowest commission but the best overall qualitative execution in the particular circumstances.

Legacy invests primarily in open-end mutual funds (Class I "Institutional" shares where available), closed end funds, exchange traded funds, stocks, bonds and CDs. Clients' accounts are generally held at discount brokers, primarily Raymond James unless a client has another preference. There are many financial and non-financial reasons to select one custodial broker over another.

Trading costs are a primary consideration, however commission or transaction charges on equity and mutual fund trades are within a reasonably close range at most discount brokers.

Legacy does not receive any portion of the trading fees.

Legacy conducts periodic reviews of Raymond James's brokerage and best execution practices, evaluates services and documents these reviews.

SOFT DOLLARS

Legacy, as a matter of policy and practice, does not have any formal or informal arrangements or commitments to utilize research, research-related products and other services obtained from broker-dealers, or third parties, on a soft dollar commission basis.

ORDER AGGREGATION

Legacy does not typically use order aggregation as most equity trades are in custom portfolios that do not lend themselves to aggregation. Also due to diversification of most portfolios and the large market capitalization of the equities in question, there is little chance that any particular trade for one client will move the market.

13. REVIEW OF ACCOUNTS

PERIODIC REVIEWS

Legacy recommends annual or more frequent account review meetings with each client.

Meetings typically occur in person in Legacy's offices. If clients are unable to meet at Legacy's offices, meetings may take place in other locations (most frequently the client's home or place of business), or by phone.

Account reviews typically cover a range of topics, including portfolio allocation, holdings and performance. At each review, the suitability of the investment strategy is confirmed with the client.

Account reviews are performed by Alex Quint (Principal).

REVIEW TRIGGERS

Meeting frequency and discussion topics may vary depending upon the client's circumstances. Triggers for additional meetings may include factors such as:

- Personal/career changes that could influence the client's investment strategy.
- Planning for any expected additional investments or cash withdrawals.

REGULAR REPORTS

Legacy provides written investment reports to each investment client on a quarterly basis. Reports show allocation, valuation and performance.

In addition, custodians independently provide monthly or quarterly statements, as well as trade confirmations, directly to clients.

14. CLIENT REFERRALS AND OTHER COMPENSATION

INCOMING REFERRALS

Referrals typically come from current clients, estate planning attorneys, accountants, personal friends of employees and other similar sources. The firm may compensate referring parties for referrals.

REFERRALS OUT

Legacy accepts referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

OTHER COMPENSATION

Legacy participates in institutional service programs with Raymond James. While there is no direct link between the investment advice given and participants in the institutional program, economic benefits are received which would not be received if Legacy did not give investment advice to clients. These benefits include: receipt of duplicate client confirmations and bundled duplicate statements, access to a trading desk servicing institutional advisors exclusively, ability to have investment advisory fees deducted directly from a client's account, availability of electronic communications software and networks for order entry, account information, quotes, general business and securities information; receipt of compliance and investment publications; and access to mutual funds and ETFs which may waive stated minimum initial investments or which may only be available to customer of institutional clients. Legacy may also have access to certain share classes, typically called Class I shares, that are unavailable to others

because Legacy will commit to invest a specific dollar amount in the mutual fund(s) offering the Class I Shares. This does not constitute a soft dollar arrangement; this is a traditional clearing relationship.

In addition, broker-dealers, mutual fund sponsors and Separate Account Managers (SAMs) with whom client accounts are maintained or clients' funds are invested, often offer advisors other benefits which may not be available if the advisor were not maintaining client's accounts or placing client's investments with such persons:

- Referral of prospective clients.
- Educational conferences and seminars at no charge or reduced rates. Frequently such conferences and seminars may include cocktail receptions, meals and entertainment. Air and/or ground transportation to and from the conference and lodging may be included at no cost or at reduced rates.
- Arranging for continuing education credits for attendance at conferences and seminars or participation in online or telephonic conferences sponsored and/or organized by the broker/dealer, mutual fund sponsor or SAM. Typically, conferences or seminars are devoted to topics such as investment analysis, income or estate taxes, retirement planning, educational planning, insurance, economics, international investing etc. that helps Legacy associates meet educational requirements to maintain designations such as CPA, PFS, or CFA.
- Invitations to affairs such as dinners, charity balls, sporting events and golf tournaments.
- The opportunity to participate in group discounts for investment software, portfolio management and reporting systems, computers, travel, etc. which smaller firms may not be in a position to arrange or negotiate independently.

However, similar arrangements are frequently made available by professional organizations such as the American Institute of Certified Public Accountants and the Financial Planners Association.

- Travel, lodging and meals for due diligence meetings that offer the opportunity to meet portfolio managers of mutual fund and exchange traded funds and discuss specific investments in which Quint Capital Management may invest funds on behalf of clients or may be evaluating for future investments.

Legacy will ensure any solicitors or persons referring clients are properly licensed/authorized under CCR 260.236 (C) (2). For Pennsylvania, Legacy will ensure that solicitors and anyone referring clients are properly licensed/authorized and meet criteria set forth in the Pennsylvania Securities Act of 1972.

15. CUSTODY

ACCOUNT STATEMENTS

All assets are held at qualified custodians who provide account statements directly to clients at their address of record at least quarterly. Clients are encouraged to carefully review the statements provided by their custodians.

PERFORMANCE REPORTS

Clients are urged to compare the account statements received directly from their custodians to the performance report statements provided by Legacy.

CUSTODY (15)

Investment advisers may be considered to have custody of client funds if certain conditions are met. An Investment Advisor may be considered to have custody of certain types of accounts, such as when a staff member acts as trustee of a related trust and Legacy acts as the investment adviser to that trust. In such cases the SEC requires an annual surprise audit of those accounts by an independent CPA firm. Legacy does not allow this arrangement. Legacy does not have custody and does not have ability to remove capital or securities from the account. Legacy can only request direct fee deduction by the custodian based on customer authorization.

16. INVESTMENT DISCRETION

DISCRETIONARY AUTHORITY FOR TRADING

Legacy accepts discretionary authority to manage securities accounts on behalf of clients. Discretionary trading authority facilitates placing trades on clients' behalf in order to promptly implement the investment policy that has been approved in writing. Discretionary investment management services are guided by the stated objectives of a client (e.g., principal preservation, maximizing capital appreciation, current income, long-term growth or growth and income). A principal or director of Legacy interviews each client (usually in person but, occasionally, by telephone) to determine an appropriate investment strategy based on criteria such as age, investment experience, current financial position, personal goals and objectives, and risk tolerance. The investment strategy for each client may be summarized in an "Investment Policy Statement" (IPS) agreed to with each client and updated as needed.

Within the parameters of each client's investment objectives and IPS (if any), Legacy has the authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. If required by the client in an IPS, for certain securities or type of securities, Legacy consults with the client prior to trading those securities to obtain concurrence.

Non-discretionary accounts require prior client approval before QCM transacts on their behalf.

Legacy does not have discretionary authority over the following: Movement of client funds, transfer of securities, custody of client funds or securities, solicit prepayment of fees six months in advance.

For non-discretionary accounts, Legacy will seek permission from Client prior to effecting any transactions.

LIMITED POWER OF ATTORNEY

A limited power of attorney is signed by each client authorizing discretionary investment management. The limited power of attorney is included in the qualified custodian's account application for our primary custodians.

17. VOTING CLIENT SECURITIES

Legacy does not vote proxies on securities. Clients will receive proxies and other solicitations directly from custodians, fund managers or transfer agents. Clients are expected to vote their own proxies.

18. FINANCIAL INFORMATION

Legacy does not have any financial impairment that will preclude the firm from meeting contractual commitments to clients. Legacy has discretionary authority to invest customer funds in securities transactions and withdraw advisory fees as per written agreement.

Legacy has not been the subject of bankruptcy petition at any time during the past ten year.

BUSINESS CONTINUITY PLAN

GENERAL

Legacy has a Business Continuity Plan in place that provides detailed steps to mitigate and recover from the loss of office space, communications, services or key people.

DISASTERS

Legacy's Disaster Recovery Plan covers natural disasters such as storms, hurricanes, tornados, and flooding. The Plan covers man-made disasters such as loss of electrical power, loss of water pressure, fire, bomb threat, nuclear emergency, chemical event, biological event, Internet outage, railway accident and aircraft accident.

All business-critical software and electronic files are maintained at a secure offsite location through the services of a third-party provider. Software and files will remain available to Legacy in the event our office is inaccessible.

Legacy's Disaster Recovery Plan is reviewed and tested periodically, and at least annually, led by Alexander Quint (Chief Compliance Officer).

ALTERNATE OFFICES

Alternate work locations are identified to support ongoing operations in the event the main office is unavailable. It is our intention to contact all clients within five days of a disaster that dictates moving our office to an alternate location.

INFORMATION SECURITY PROGRAM

INFORMATION SECURITY

Legacy maintains an information security program to reduce the risk that clients' personal and confidential information may be breached.

PRIVACY NOTICE

Legacy is committed to maintaining the confidentiality, integrity and security of personal information entrusted to us by our clients. We consider our relationship with our clients to be our most important asset. We strive to maintain your trust and confidence in our firm by protecting your personal information to the best of our ability. We believe all of our clients value their privacy, so we will not disclose your personal information to anyone unless it is required by law, at your direction, or is necessary to provide you with our services. We have not and will not sell your personal information to anyone.

Legacy collects and maintains information required to provide professional services to you. The categories of non-public information that we collect and maintain depend upon the scope of the client engagement. They generally include:

- Personal financial information;
- Qualitative information about objectives, goals and health to the extent required for the planning process;

- Information we receive from you to provide investment advice or open an account (such as your name, address, phone number, objectives and net worth);
- Information we generate to service your account (such as transaction histories of purchases and sales); and,
- Information we may receive from third parties to provide professional services (such as copies of tax returns, estate planning documents from your attorney, or trade confirmations from brokerage firms).

Legacy has instituted the following practices to fulfill our commitment to safeguard the confidential information of our clients:

- We limit employee and agent access to information to those persons who have business or professional reason for knowing, and only to nonaffiliated parties as permitted by law. For example, federal regulations permit us to share a limited amount of information about you with a brokerage firm in order to execute securities transactions on your behalf, or to discuss your financial situation with your attorney or accountant.
- We maintain a secure office and computer environment to ensure that your information is not placed at unreasonable risk.
- We require unaffiliated third parties who provide services for us, such as auditors, computer consultants, and our independent provider of investment reporting services to sign confidentiality agreements to keep your information private.
- We do not provide your personally identifiable information to mailing lists, vendors or solicitors for any purpose.

Because some members of Legacy are Certified Financial Planners, we may be asked to disclose client data to government and private regulatory organizations or associations as required by law, regulations or codes of ethics and professional responsibility and disciplinary rules and procedures. We will satisfy ourselves regarding the compliance with privacy rules before submitting confidential client information to any agency, organization or group.

We will notify you in advance if our privacy policy is expected to change. We are required by law to deliver this *Privacy Notice* to you annually, in writing.

BROCHURE SUPPLEMENT (PART 2B OF FORM ADV)

EDUCATION AND BUSINESS STANDARDS

Legacy requires that its personnel that are providing investment advice hold an undergraduate degree and ten (10) years in the securities industry, advanced degree in business and/or finance or an advanced professional designation such as CPA, ChFC, or CFA. State registrations are required based on each state's standards and practices.

PROFESSIONAL CERTIFICATIONS

Employees have earned certifications and credentials that are required to be explained in further detail.

19. REQUIREMENTS FOR STATE-REGISTERED ADVISORS:

Alexander N. Quint is the Chairman and CEO of both Quint Capital Corporation (QCC), a FINRA registered Broker-Dealer and Quint Cap Insurance Agency; and sole Managing Member of both Quint Capital Management LLC (QCM) a Registered Investment Advisor and QCAP Holdings LLC (QCAP), the Holding Company for QCC, QCM and Quint Cap. QCAP Holdings LLC (Holding-Company) is wholly owned by Mr. Quint. Mr. Quint designates 40% of his time to QCM; and 60% to QCC, QCAP and Quint Cap insurance agency. There are no material issues, regulatory investigations, criminal suites, liens, or judgments versus any of these organizations.

Biography:

Alexander N. Quint

- Managing Member
 - QCAP Holdings LLC - Holding-Company
 - Quint Capital Management LLC – Registered Investment Advisor
- Chairman of the Board, President
 - Quint Capital Corporation (DBA Champion Capital Corporation) – Broker-Dealer
 - Quint Cap Insurance Agency
- Examinations:
 - FINRA - Series 7, 24, 63, 66, 99
 - Insurance – Life, Health, Accident
- Entered the Securities Industry in 1981

EXPERIENCE

2013 - Present

Quint Capital Corporation

230 Park Avenue, Suite 460, New York, NY 10169 (212) 682 5090

Managing Member and Founder

Quint Capital LLC purchased Champion Capital Corporation in 2015 and the name was changed to Quint Capital Corporation, The Firm specializes in:

- Investment Management
- Employee Benefit Plans
- Hedging and Monetizing Transactions
- Corporate Finance
- Securities and Insurance Brokerage

2000 – Present

Quint, Miller & Co., Inc. - Peterson Investments Inc. (2000 – 2/2012)

Quint, Miller & Co., Inc. is not a Broker-Dealer and Mr. Quint is only a shareholder in the company.

Principal and Founder

www.quintmiller.com

1997 - 2000

Canadian Imperial Bank of Commerce (CIBC) - Executive Director

One World Financial Center, New York, NY 10281

1992 – 1997

Salomon Smith Barney – Senior Vice President

200 Park Avenue, New York, NY 10166

1983 – 1992

UBS Paine Webber – Senior Vice President

200 Park Avenue, New York, NY 10166

EDUCATION

University of Buffalo, Buffalo NY

Master of Business Administration (MBA) – 1982

Concentration in Finance

Bachelor of Science (BS) – 1981

Major in Business Administration and Finance

- Magna Cum Laude
- National Honor Society
- Combined BS/MBA degree achieved in five years
- Selected for Research Internship – M&T Bank

Please visit the FINRA Brokercheck website (www.FINRA.org) for additional information concerning Mr. Quint.

PLEASE NOTE:

1. A copy of this brochure must be provided to you at least 24 hours prior to signing an agreement or you have five business days in which to cancel the agreement without penalty.
2. Before referring a client to an outside third-party with which it works jointly, or offering sub-advisory services to an outside third-party with which it works jointly, QCM ensures the financial institution or person is properly licensed and allowed to provide services based on State, Federal and regulatory requirements. QCM also ensures that products and services, including insurance products, are only transacted with proper licensing.
3. There are no material conflicts of interests that the Firm is currently aware of. Management is diligent in monitoring for potential conflicts of interest, particularly between the subsidiaries of QCAP Holdings LLC., i.e. common ownership of Registered Investment Advisor and Broker-Dealer entities.

Appendix 1: WRAP-FEE PROGRAM BROCHURE

**Quint Capital Management
(CRD 26586)**

**230 Park Avenue
Suite 460
New York, NY 10169**

212.682.5090

Firm Wrap Fee Program Brochure as of 09/07/2016

Quint Capital Management also does business under the name Legacy Trust Advisors. Additional information about Quint Capital Management and Legacy Trust Advisors also is available on the SEC's website at www.adviserinfo.sec.gov

Please check www.finra.org for more information about Quint Capital Corporation, Quint Capital Management, and Alexander Quint (CRD 1012135).

Registration as an Investment Advisor does not imply a certain level of skill or training. Please use many factors and sources in determining a suitable Advisor.

This wrap fee program brochure provides information about the qualifications and business practices of Quint Capital Management. If you have any questions about the contents of this brochure, please contact us at aquint@quintcapital.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 Quint Capital Management is available on the SEC's website at www.adviserinfo.sec.gov.

Quint Capital Management is registered or seeking registration in the following states: New York, California, Connecticut, Florida and Pennsylvania.

MATERIAL CHANGES

This is the initial appendix to Quint Capital Management’s Firm Brochure; and therefore, all of the material is new. Please review carefully.

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1. Services, Fees and Compensation:

a. Services, including the types of Portfolio Management Services, provided under each program.

There are two distinct Portfolio Management Services provided:

Internal Portfolio Management (IPM) - The following process is utilized:

- Investment Policy Questionnaire - Administered to prospective clients.
- Statement of Investment Policy - Developed from responses of prospective clients to questionnaire.
- Asset Allocation - Developed from responses of prospective clients to questionnaire.
- Investment - Made on behalf of client in consideration of Statement of Investment Policy and Asset Allocation.
- Quarterly Review - A report is developed on a quarterly basis indicating gross performance (non-risk-adjusted), risk-adjusted performance and performance relative to the indexes.
- Custody - All Client Assets in the IPM Program are held in custody at our clearing firm, Raymond James Financial (NYSE RJF). The fees for custodial services are included in the aggregate fees for Portfolio Management, i.e., there are no additional custodial fees.

External Portfolio Management (EPM)

- Investment Policy Questionnaire - Administered to prospective clients.
- Statement of Investment Policy - Developed from responses of prospective clients to questionnaire.
- Asset Allocation - Developed from responses of prospective clients to questionnaire.
- Investment Manager Selection - Based on prospective client responses to the Investment Policy Questionnaire and the resulting Asset Allocation Model, external Investment Managers are selected from a list of approved Investment Managers provided by our clearing firm, Raymond James. For each Asset Category suggested from the Asset Allocation Model, an Investment Manager is selected based upon his performance within that category, relative to competitors. Only the strongest Investment Managers are selected within each asset category. Investment Manager Selection Criteria include:
 - Experience of the Investment Manager - Includes length of service of Portfolio Manager, prior employment history.
 - Excess Contribution to Performance of Manager relative to the appropriate indexes, measured by "alpha."
 - Gross Portfolio Performance.
 - Risk assumed by the portfolio or standard deviation, measured by "beta."
 - Risk-Adjusted Portfolio Performance.
 - Up-Market/Down Market Performance Participation.
 - Please note - The ultimate selection decision is subjective and based upon above criteria.
- Quarterly Review - A report is developed on a quarterly basis indicating outright performance, risk adjusted performance and performance relative to the appropriate indexes.
- Custody - All Client Assets in the IPM Program are held in custody at our clearing firm, Raymond James Financial (NYSE RJF). The fees for custodial services are included in the aggregate fees for Portfolio Management, i.e., there are no additional custodial fees.

Wrap fee charged for each program or, if fees vary according to a schedule, provide the fee schedule.

Internal Portfolio Management (IPM) - The fee will range from .5% to 2.0% annually.

External Portfolio Management (EPM) - The fee will range from 1.0% to 2.0% annually. The higher minimum fee is attributable to the fees associated with compensating the External Portfolio Manager.

Indicate whether fees are negotiable and identify the portion of the total fee, or the range of fees, paid to portfolio managers.

Fees are negotiable. The fees paid to External Portfolio Managers will range from approximately .5% to 1.0%, depending on the manager.

b. Fees:

Wrap Fees and Schedule

Internal Portfolio Management (IPM) - The fee will range from .5% to 2.0% annually.

External Portfolio Management (EPM) - The fee will range from 1.0% to 2.0% annually. The higher minimum fee is attributable to the fees associated with compensating the External Portfolio Manager.

There is no other fee schedule outside of what is indicated above.

Fee Schedule vs. Purchasing Services Separately

The fees charged in our investment programs are squarely within industry standards. They are no better or worse than purchasing services separately.

c. Addition Fees to the Wrap Program - mark-ups, mutual fund fees or any other related fees.

The client does not pay any additional fees to the wrap program. One fee is inclusive of all the associated services provided to the client.

The client does not pay commissions, mark-ups or any other transaction costs on the purchase of individual securities.

In the event mutual funds are utilized for purposes of diversification of modest amounts into alternative asset classes, a separate account is established that does not charge a wrap fee. C-share mutual funds are utilized that charge 1% annually of assets. Please note again that these mutual fund accounts are separate and distinct from the wrap fee program and are not assessed a wrap fee. Furthermore, the 1% annual mutual fund fee is paid by the Mutual Fund Company and is not taken directly from client accounts. QCM does not collect fees of \$500 or more and six months in advance

d. Any representative who recommends the wrap fee program is paid a percentage of the fee. This fee may be more or less than other programs; or if the Client paid separately for investment advice, brokerage or other services.

The fees charged in our investment programs are within the guidelines of industry standards. They may be more or less than competing programs currently available in the marketplace, depending on the level of service provided to the customer; or if the client paid separately for investment advice, brokerage or other services.

2. Account Requirements and Types of Clients - Clients and requirements relative to representation in the Brochure. The clients and requirements are the same as in the brochure.

3. Portfolio Manager Selection and Evaluation

a. Investment Manager Selection Criteria include:

- Experience of the Investment Manager - Includes length of service of Portfolio Manager, prior employment history.
- Excess Contribution to Performance of Manager relative to the appropriate indexes, measured by "alpha."

- Gross Portfolio Performance.
- Risk assumed by the portfolio or standard deviation, measured by "beta."
- Risk-Adjusted Portfolio Performance.
- Up-Market/Down Market Performance Participation.
- Please note:
 - The ultimate selection decision is subjective, based upon the above criteria.
 - Performance is reviewed quarterly, based upon the above criteria.
 - Quarterly performance Is executed internally, utilizing the above criteria.

b. There are two Investment Management alternatives that are offered - Internal Portfolio Management (IPM) and External Portfolio Management (EPM):

Potential Conflict of Interest - The conflict that exists is purely economic. For IPM, the internal investment professional receives a greater amount of compensation, in consideration of the portfolio management service they provide. For EPM, the internal investment professional receives less compensation since the external portfolio manager requires compensation in consideration of their services. For example:

Assume:

Assets	\$1 million
Fee to Client	1.25% annually
Fee to EPM	1/2% annually

Compensation to internal investment professional for IPM would be \$12,500 annually (\$1 million X 1.25% annual fee to client)

Compensation to internal investment professional for EPM would be \$7,500 annually (\$1 million X 1.25% annual fee to client less \$1 million X .5% annual fee to EPM)

Conflict Resolution - Both IPM and EPM alternatives are clearly explained to prospective clients. It is the client that decides which alternative is more appropriate for them, based solely on their personal preference. In general, the larger institutional accounts are more inclined to opt for the EPM alternative.

4. **Client Information Provided to Portfolio Managers** - In consideration of privacy standards that we adhere to, client information is provided to external portfolios managers only with permission from the client. However, without receiving this information, the external portfolio manager will not take on the assignment, i.e., our client also becomes a client of the portfolio manager. The client information provided is the same as appears on our Client Agreement, i.e., Name, address, phone #, email address, DOB, SS#, etc. This information is updated every two years.
5. **Client Contact with Portfolio Managers. Client communication directly with portfolio managers (third parties) and if so, the circumstances.**

It is not generally customary for individual clients to communicate directly with external portfolio managers. Of course, all clients may speak with our internal portfolio managers as often as they like.

6. **Additional Information - Please see the following Sections in the Firm Brochure regarding: Disciplinary Information, and Other Financials Industry Activities and Affiliations:**

- Code of Ethics
- Participation or Interest in Client Transactions and Personal Trading
- Review of Accounts
- Client referrals and other compensation
- Financial information

Please Note - With respect to traditional securities industry activity relative to this specific Investment Management activity, concerning the above referenced items, there is no material difference in the way all of these activities are conducted. At all times, we are concerned first and foremost with ethical considerations and the productive experience of the client.

7. **Requirements for State Registered Advisors:**

- **Holding Company** – QCAP Holdings, LLC, owned 100% by Alexander N. Quint who is the Managing Member. The holding company is 100% owner of its three subsidiaries:
- **Subsidiary 1** - Quint Capital Management, LLC - Registered Investment Advisor (RIA) - Quint Is the Managing Member.
- **Subsidiary 2** - Quint Capital Corporation - Broker-Dealer (CRD 26586) duly registered with FINRA. Quint is the President.
- **Subsidiary 3** - Quint Cap - Insurance Agency duly registered with New York State. Quint is the President.
- **Time Allocation** - Quint devotes 40% of his time to Quint Capital Management (RIA) and 60% of his time collectively to Quint Capital Corporation (BD), Quint Cap (Insurance agency) and Quint Capital, LLC (holding company).
- Please note - there are no material issues, regulatory investigations, criminal citations, liens, judgements or any adverse circumstances whatsoever connected to any of the above referenced entities.

8. **FINRA Rule 2264. Margin Disclosure Statement**

(a) No member shall open a margin account, as specified in Regulation T of the Board of Governors of the Federal Reserve System, for or on behalf of a non-institutional customer, unless, prior to or at the time of opening the account, the member has furnished to the customer, individually, in paper or electronic form, and in a separate document (or contained by itself on a separate page as part of another document), the margin disclosure statement specified in this paragraph (a). In addition, any member that permits non-institutional customers either to open accounts online or to engage in transactions in

securities online must post such margin disclosure statement on the member's Web site in a clear and conspicuous manner.

Margin Disclosure Statement

Your brokerage firm is furnishing this document to you to provide some basic facts about purchasing securities on margin, and to alert you to the risks involved with trading securities in a margin account. Before trading stocks in a margin account, you should carefully review the margin agreement provided by your firm. Consult your firm regarding any questions or concerns you may have with your margin accounts.

When you purchase securities, you may pay for the securities in full or you may borrow part of the purchase price from your brokerage firm. If you choose to borrow funds from your firm, you will open a margin account with the firm. The securities purchased are the firm's collateral for the loan to you. If the securities in your account decline in value, so does the value of the collateral supporting your loan, and, as a result, the firm can take action, such as issue a margin call and/or sell securities or other assets in any of your accounts held with the member, in order to maintain the required equity in the account.

It is important that you fully understand the risks involved in trading securities on margin. These risks include the following:

- **You can lose more funds than you deposit in the margin account.** A decline in the value of securities that are purchased on margin may require you to provide additional funds to the firm that has made the loan to avoid the forced sale of those securities or other securities or assets in your account(s).
- **The firm can force the sale of securities or other assets in your account(s).** If the equity in your account falls below the maintenance margin requirements, or the firm's higher "house" requirements, the firm can sell the securities or other assets in any of your accounts held at the firm to cover the margin deficiency. You also will be responsible for any short fall in the account after such a sale.
- **The firm can sell your securities or other assets without contacting you.** Some investors mistakenly believe that a firm must contact them for a margin call to be valid, and that the firm cannot liquidate securities or other assets in their accounts to meet the call unless the firm has contacted them first. This is not the case. Most firms will attempt to notify their customers of margin calls, but they are not required to do so. However, even if a firm has contacted a customer and provided a specific date by which the customer can meet a margin call, the firm can still take necessary steps to protect its financial interests, including immediately selling the securities without notice to the customer.

- **You are not entitled to choose which securities or other assets in your account(s) are liquidated or sold to meet a margin call.** Because the securities are collateral for the margin loan, the firm has the right to decide which security to sell in order to protect its interests.
- **The firm can increase its “house” maintenance margin requirements at any time and is not required to provide you advance written notice.** These changes in firm policy often take effect immediately and may result in the issuance of a maintenance margin call. Your failure to satisfy the call may cause the member to liquidate or sell securities in your account(s).
- **You are not entitled to an extension of time on a margin call.** While an extension of time to meet margin requirements may be available to customers under certain conditions, a customer does not have a right to the extension.

(b) Members shall, with a frequency of not less than once a calendar year, deliver individually, in paper or electronic form, the disclosure statement described in paragraph (a) or the following bolded disclosures to all non-institutional customers with margin accounts:

Securities purchased on margin are the firm’s collateral for the loan to you. If the securities in your account decline in value, so does the value of the collateral supporting your loan, and, as a result, the firm can take action, such as issue a margin call and/or sell securities or other assets in any of your accounts held with the member, in order to maintain the required equity in the account. It is important that you fully understand the risks involved in trading securities on margin. These risks include the following:

- **You can lose more funds than you deposit in the margin account.**
- **The firm can force the sale of securities or other assets in your account(s).**
- **The firm can sell your securities or other assets without contacting you.**
- **You are not entitled to choose which securities or other assets in your account(s) are liquidated or sold to meet a margin call.**
- **The firm can increase its “house” maintenance margin requirements at any time and is not required to provide you advance written notice.**
- **You are not entitled to an extension of time on a margin call.**

The annual disclosure statement required pursuant to this paragraph (b) may be delivered within or as part of other account documentation, and is not required to be provided in a separate document or on a separate page.

(c) In lieu of providing the disclosures specified in paragraphs (a) and (b), a member may provide to the customer and, to the extent required under paragraph (a) post on its Web site, an alternative disclosure statement, provided that the alternative disclosures shall be substantially similar to the disclosures specified in paragraphs (a) and (b).

(d) For purposes of this Rule, the term “non-institutional customer” means a customer that does not qualify as an “institutional account” under [Rule 4512\(c\)](#).

Part 2B of Form ADV: Brochure Supplement – Registered Advisor Representatives

1. Cover Page – General Information Regarding Registered Advisor Representatives

- a. Name
- b. Business Address
- c. Phone Number
- d. Firm Name
- e. Business Address
- f. Phone Number
- g. Date of Supplement
- h. Statement - This brochure supplement provides information about [**name of supervised person**] that supplements the Quint Capital Management brochure. You should have received a copy of that brochure. Please contact Alexander Quint, President of Quint Capital Management if you did not receive Quint Capital Management’s brochure or if you have any questions about the contents of this supplement. Additional information about [**name of supervised person**] is available on the SEC’s website [atwww.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

2. Educational Background and Business Experience

- a. Name
- b. Date of Birth
- c. Formal Education – High School, College, Graduate School, Other
- d. Business Background – Prior Five Years
- e. Professional Designations and Minimum Qualification for Designation

3. Disciplinary Information

- a. A criminal or civil action in a domestic, foreign or military court of competent jurisdiction.
- b. An administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority.
- c. A self-regulatory organization (SRO) proceeding.
- d. Any other hearing or formal adjudication in which a professional attainment, designation, or license of the supervised person was revoked or suspended because of a violation of rules relating to professional conduct.

4. Other/Outside Business Activity

- a. If a relationship between the advisory business and the supervised person’s other financial industry activities creates a material conflict of interest with clients, describe the nature of the conflict and generally how it is addressed.
- b. If the supervised person is actively engaged in any business or occupation for compensation not discussed in response to Item 4.A, above, and the other business activity or activities provide a substantial source of the supervised person’s income or involve a substantial amount of the supervised person’s time, disclose this fact and describe the nature of that business.

5. **Additional Compensation** - If someone who is not a client provides an economic benefit to the supervised person for providing advisory services, generally describe the arrangement.
6. **Supervision** - Explain how you supervise the supervised person, including how you monitor the advice the supervised person provides to clients. Provide the name, title and telephone number of the person responsible for supervising the supervised person's advisory activities on behalf of your firm.
7. **Legal History**
 - a. Arbitration – Award/Liability on claim greater than \$2,500.
 - an investment or an *investment-related* business or activity;
 - fraud, false statement(s), or omissions;
 - theft, embezzlement, or other wrongful taking of property;
 - bribery, forgery, counterfeiting, or extortion; or
 - dishonest, unfair, or unethical practices.
 - b. Civil, self-regulatory organization, or administrative proceeding - An award or otherwise being found liable:
 - an investment or an *investment-related* business or activity;
 - fraud, false statement(s), or omissions;
 - theft, embezzlement, or other wrongful taking of property;
 - bribery, forgery, counterfeiting, or extortion; or
 - dishonest, unfair, or unethical practices.
 - If the *supervised person* has been the subject of a bankruptcy petition, disclose that fact, the date the petition was first brought, and the current status.

Part 2B of Form ADV: Brochure Supplement – Patrick J Considine

1. **Cover Page – General Information Regarding Registered Advisor Representatives**
 - a. Name Patrick J. Considine
 - b. Business Address 230 Park Avenue, Suite 908 New York, NY 10169-0499
 - c. Phone Number (212) 682-5090
 - d. Firm Name Quint Capital Management, LLC
 - e. Business Address 230 Park Avenue, Suite 908 New York, NY 10169-0499
 - f. Phone Number (212) 682-5090
 - g. Date of Supplement 02/20/2020
 - h. Statement - This brochure supplement provides information about Patrick J. Considine that supplements the Quint Capital Management brochure. You should have received a copy of that brochure. Please contact Alexander Quint, President of Quint Capital Management if you did not receive Quint Capital Management's brochure or if you have any questions about the contents of this supplement. Additional information about Patrick J. Considine is available on the SEC's website [atwww.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).
2. **Educational Background and Business Experience**
 - a. Name Patrick Considine
 - b. Date of Birth March 28, 1962
 - c. Formal Education – High School, College, Graduate School, Other
 - d. Business Background – Prior Five Years
 - e. Professional Designations and Minimum Qualification for Designation

The Advisor Representative, Mr. Considine, was born on March 28, 1962, is a 1980 graduate of Dumont High School, Dumont, NJ and between 1992 and 2000 attended Frederick, Darian, Nassau and LaGuardia Community Colleges, accumulating 88 college credits with a Cumulative GPA of 3.85. He has worked as a Financial Advisor both at (a) Citigroup Global Markets from 2002 – 2018; and (b) Merrill Lynch in 2001. Prior to that, from 1992 to 2001, he was an Independent Contractor retained by various organizations within the Hospitality Industry.

Summary of Prior Employment:

2007 – 2018 (11 years) Citigroup Global Markets, Inc. (CRD# 7059)
2003 – 2007 (4 years) Citicorp Investment Swervices (CRD# 23988)
2001– 2002 (1 year) Merrill Lynch Pierce Fenner & Smith, Inc.

- 3. **Disciplinary Information** – None
- 4. **Other/Outside Business Activity**

Mr. Considine is the owner of a consulting company, Considine LLC, which has no revenue currently, however is anticipated to, in the future. He has no outside income of any kind, with his sole source of income derived from his engagement with Quint Capital Management. Therefore, Mr. Considine has no material conflicts of interest that would adversely affect any of his clients. He is also a volunteer athletic coach for teenage children in his community, for which he receives no compensation.

- 5. **Additional Compensation**

Mr. Considine does not receive any compensation whatsoever from any activity outside of that associated with Quint Capital Management. No other compensation includes salary, bonuses, prizes, etc.

- 6. **Supervision**

All prospective client transactions are presented to the firm’s CCO, Alexander N. Quint - (212) 682 5090 - prior to execution. Quint and Considine discuss in detail the advice offered to clients that may result in these transactions, including but not limited to; (a) client objectives; (b) risk factors; and (c) suitability.

Please refer to the Quint Capital Written Supervisory Procedures (WSP) for a detailed description of the supervisory process applicable to the Advisor Representative.

Supervisor Contact Information:

Alexander N. Quint
Chief Compliance Officer (CCO)
Quint Capital Corporation
230 Park Avenue – Suite 908
New York, NY 10169-0499
(212) 682 5090 – W
(917) 885 6731 - M
aquint@quintcapital.com
www.quintcapital.com

7. Legal History - None

Part 2B of Form ADV: Brochure Supplement – James K. Lombardo

1. Cover Page – General Information Regarding Registered Advisor Representatives

- a. Name James K. Lombardo
- b. Business Address 230 Park Avenue, Ste. 908 New York, NY 10169
- c. Phone Number 212 682 5090
- d. Firm Name Quint Capital Corporation
- e. Business Address 230 Park Avenue, Ste. 908 New York, NY 10169
- f. Phone Number 212 682 5090
- g. Date of Supplement 02/20/2020
- h. Statement - This brochure supplement provides information about James K. Lombardo that supplements the Quint Capital Management brochure. You should have received a copy of that brochure. Please contact Alexander Quint, President of Quint Capital Management if you did not receive Quint Capital Management’s brochure or if you have any questions about the contents of this supplement. Additional information about James K. Lombardo is available on the SEC’s website [atwww.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

Additional activities of Mr. Lombardo include:

- 1975 Steve Colgate Sailing School Sail Racing Course: City Island, New York
- 1987 Hon. Order of Kentucky Colonels Commissioned as a Kentucky Colonel
- 1987 PADI Scuba Licenses Certified Open Water Scuba Diver (1987)
- Certified Scuba Ice Diver (1988)
- Certified Underwater Photographer (1988)
- 1993 BMW Club Driving School Lime Rock Park, Lakeville, Connecticut
- 1994 Skip Barber Driving School Road Track Driving School

2. Educational Background and Business Experience

- a. Name James K. Lombardo
- b. Date of Birth November 9, 1945
- c. Formal Education
 - High School Abraham Lincoln High School, Brooklyn NY June 1963
 - College Polytechnic Institute of Brooklyn, June 1963
BS Aerospace Engineering
 - Other USAF Officer Candidate School, San Antonio, TX

General Background - Mr. Lombardo was born on November 9, 1945 in Brooklyn, NY; graduated Abraham Lincoln High School, Brooklyn, NY in June, 1963 and graduated Polytechnic Institute of Brooklyn in June, 1967 with a Bachelor of Science Degree in Aerospace Engineering.

Mr. Lombardo served in the United States Air force from June, 1967 to November 1971. His assignments include:

- Officer’s Candidate School: San Antonio, Texas
- Flight School: Vance AFB, Enid, Oklahoma
- Squadron Commander: Keesler AFB, Biloxi, Mississippi
- Executive Support Officer: Korat Royal Thai AFB, Thailand
- Honorably Discharged with the rank of Captain

d. Business Background

Prior Employment - Mr. Lombardo's work experience prior to the securities industry includes:

- Xerox Corporation [10 years: 06/1972 to 03/1982]
Sales/Marketing: New York City, New York & Greenwich, Connecticut
- O.C. Tanner [Salt Lake City, Utah] [1 year: 06/1982 to 06/1983]
Corporate Recognition Program Sales: New York Metro Area

Mr. Lombardo's work experience within the securities industry as a Financial Advisor Prior to Quint Capital Management includes:

- **03/14/2001 - 01/07/2019**
PETERSEN INVESTMENTS, INC. (CRD#:38537)
BEDFORD, NY
- **05/23/1997 - 02/08/2001**
GRUNTAL & CO., L.L.C. (CRD#:372)
NEW YORK, NY
- **02/14/1990 - 04/29/1997**
A. G. EDWARDS & SONS, INC. (CRD#:4)
ST. LOUIS, MO
- **02/07/1990 - 03/01/1990**
JESUP & LAMONT, INCORPORATED (CRD#:3144)
- **03/15/1989 - 01/30/1990**
J. T. MORAN & CO., INC. (CRD#:15655)
- **01/02/1990 - 01/27/1990**
HANIFEN, IMHOFF SECURITIES CORP. (CRD#:10620)
- **12/12/1989 - 01/02/1990**
MOORE & SCHLEY, CAMERON & CO. (CRD#:6917)
- **03/13/1984 - 04/13/1989**
MCLAUGHLIN, PIVEN, VOGEL INC. (CRD#:7404)
- **01/16/1984 - 03/14/1984**
M V SECURITIES, INC. INC. (CRD#:7201)

3. Disciplinary Information – None

4. Other/Outside Business Activity

Mr. Lombardo has no outside business activity or outside income of any kind, with his sole source of income derived from his engagement with Quint Capital Management. Therefore, Mr. Lombardo has no material conflicts of interest that would adversely affect any of his clients. Additional

Additional Compensation - Mr. Lombardo does not receive any compensation whatsoever from any activity outside of that associated with Quint Capital Management. No other compensation includes salary, bonuses, prizes, etc.

5.

6. Supervision

All client transactions are presented to the firm's CCO, Alexander N. Quint - (212) 682 5090 - prior to execution. Quint and Lombardo discuss in detail the advice offered to clients that may result in these transactions, including but not limited to; (a) client objectives; (b) risk factors; and (c) suitability.

Mr. Lombardo also utilized the services of Bellatore Financial, Inc., of San Jose, California. Bellatore is an external Advisory Firms that Lombardo introduces to clients, in exchange for an agreed upon portion of the investment management fee.

7. Legal History

Regulatory History – Investment Related - Mr. Lombardo has no disciplinary actions against him as they pertain to criminal or civil actions in a domestic, foreign or military court of competent jurisdiction. He has twenty (20) Disclosure Items that are detailed on FINRA BrokerCheck, the last of which was in 2001, eighteen years prior to this Brochure Supplement. These are disclosures that involve:

- Administrative proceeding before the SEC, any federal regulatory agency, any state regulatory agency or any foreign financial regulatory authority;
- Self-regulatory organization (SRO) proceedings; or
- Hearing or formal adjudication in which a professional attainment, designation, or license of Mr. Lombardo has been revoked or suspended.

Each of these twenty (20) disclosure items is related to only a few Research Reports issued by his Broker-Dealer employer at the time, that recommended the purchase of certain bonds. These research recommendations were not developed by Lombardo on his own. These bonds were being sold from this firm's proprietary trading account in their bond department on a principal basis. The bonds were owned by the firm and being sold from the firm's proprietary trading account to customers of the firm. The firm's bond department was a profit center for the firm, so while legal to do so, it constituted a conflict of interest between the firm and its clients. These bonds, that were recommended by the firm's research department, defaulted causing them to lose the majority of their value. The firm's bond department, knowing that these bonds owned by the firm were in danger of default, published a research report recommending them for purchase by the firm's clients, to avoid the firm taking enormous losses in these bonds that they owned. These bonds were sold to the firm's clients, who then suffered these significant losses, causing the firm itself to avoid taking these losses.

Mr. Lombardo was a victim of his firm. The firm encouraged him to sell these bonds to his clients so that the clients would experience the losses and not the firm. This is why in each of these disclosure events, it was the firm that paid all restitution to clients and Mr. Lombardo was never obligated to pay a thing. The reason Mr. Lombardo has so many disclosure events is because he sold the same bonds over and over to several of his clients, i.e., there are several events, but they all originate from a very few bond issues. When the bonds defaulted, Mr. Lombardo advised his clients to sue the firm for putting out misleading and self-serving research that would harm the clients, but save the firm. Unfortunately, Mr. Lombardo was told by his firm that they would protect him in terms of any regulatory discourse and he believed them. As a consequence of his good nature, he did not provide himself with adequate legal protection. These several disclosures are a direct result of his unfortunate lack of personal legal protection. Had he retained competent counsel for himself, he would not have suffered any of these disclosures since his firm was clearly at fault, not Mr. Lombardo. Mr. Lombardo and his clients were victims of his firm.

Please recognize that Quint Capital is in the process of retaining counsel to expunge the record of Mr. Lombardo. After seeing the research reports that recommended the bonds that were the cause of these problems, it was very clear that Mr. Lombardo was not at fault and his firm behaved in an unscrupulous manner to protect their own interests, with no regard for Mr. Lombardo or his clients who bore the economic brunt of these bad investments. We further speculate that the firm was premeditated in this approach since even though they eventually paid restitution to bondholders that brought action: (1) not all bond holders that lost money brought action; and (2) the funds paid to bond holders that brought action was likely covered by the firm's E&O Insurance Policy and not the firm, whereas if their bonds had defaulted in the firm's proprietary trading account, it would have been a direct and unconditional loss to the firm.

Part 2B of Form ADV: Brochure Supplement – Kurt Anthony Stein - Next

1. Cover Page – General Information Regarding Registered Advisor Representatives

- a. Name Kurt Anthony Stein
- b. Business Address 230 Park Avenue, Ste. 908 New York, NY 10169
- a. Phone Number 212 682 5090
- b. Firm Name Quint Capital Corporation
- c. Business Address 230 Park Avenue, Ste. 908 New York, NY 10169
- d. Phone Number 212 682 5090
- e. Date of Supplement 02/20/2020
- f. Statement - This brochure supplement provides information about Kurt Anthony Stein that supplements the Quint Capital Management brochure. You should have received a copy of that brochure. Please contact Alexander Quint, President of Quint Capital Management if you did not receive Quint Capital Management's brochure or if you have any questions about the contents of this supplement. Additional information about Kurt Anthony Stein is available on the SEC's website [atwww.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

General Background - Mr. Stein was born on June 23, 1967 in Philadelphia, PA, graduated Northeast High School in St. Petersburg in 1985 and graduated the University of Florida in 1989 with a B.S. in Business Administration, concentrating in finance. He engaged in Graduate Studies of Talmudic Law at Yeshiva University in Jerusalem, Israel and currently teaches Torah studies to young adults for no compensation. He has worked as a Financial Advisor at Goldman Sachs, Merrill Lynch, and National Securities Corp.

2. Educational Background and Business Experience

- a. Name Kurt Anthony Stein
- b. Date of Birth June 23, 1967
- c. Formal Education – High School, College, Graduate School, Other
 - High School 1985 - Northeast High School, St. Petersburg, FL
 - College 1989 - University of Florida
B.S. in Business Administration, concentration in finance
 - Other Graduate Studies of Talmudic Law - Yeshiva University,
Jerusalem, Israel

d. Business Background – Prior Five Years

- 1999 – 2001 (2 years) Goldman Sachs & Co. (CRD# 361)
- 2001 – 2018 (16 years) Merrill Lynch, Pierce, Fenner & Smith.
- 2018 – 2019 (1 year) National Securities Corp. (CRD# 7569)

3. **Disciplinary Information** - None

4. **Other/Outside Business Activity**

Mr. Stein owns a consulting company, Skymount Capital LLC, which is an entity that only administers his BD and RIA activity and has no other revenue currently. He has no other outside income of any kind, with his sole source of income derived from his engagements with Quint Capital. Therefore, Mr. Stein has no material conflicts of interest of any sort that would adversely affect any of his clients, in the BD or RIA arenas.

Additional Compensation

Mr. Stein does not receive compensation at all from any activity outside of that associated with Quint Capital. No other compensation includes salary, bonuses, prizes, etc.

5. **Supervision**

All client transactions are presented to the firm’s CCO, Alexander N. Quint - (212) 682 5090 - prior to execution. Quint and Stein discuss in detail the advice offered to clients that may result in these transactions, including but not limited to; (a) client objectives; (b) risk factors; and (c) suitability.

6. **Legal History**

- Merrill Lynch was fined for a Collateralized Debt Obligation (CDO) investment that they recommended. Mr. Stein was not named in the action; however, the action is referenced in his FINRA BrokerCheck profile. The issue was settled by Merrill Lynch without any economic contribution made by Mr. Stein.
- A direct investment has been called into questioned by a client. The issue is currently pending. Since the client is highly sophisticated and specifically in the business of evaluating direct investments, it is anticipated that this will ultimately be dropped.

Part 2B of Form ADV: Brochure Supplement – William McConville

1. **Cover Page – General Information Regarding Registered Advisor Representatives**

- | | |
|---------------------|----------------------------------------------------|
| a. Name | William McConville |
| b. Business Address | 230 Park Avenue, Suite 908 New York, NY 10169-0499 |
| c. Phone Number | (212) 682-5090 |
| d. Firm Name | Quint Capital Management, LLC |
| e. Business Address | 230 Park Avenue, Suite 908 New York, NY 10169-0499 |
| f. Phone Number | (212) 682-5090 |

g. Date of Supplement 02/20/2020

Statement - This brochure supplement provides information about William McConville that supplements the Quint Capital Management brochure. You should have received a copy of that brochure. Please contact Alexander Quint, President of Quint Capital Management if you did not receive Quint Capital Management's brochure or if you have any questions about the contents of this supplement. Additional information about William McConville is available on the SEC's website [atwww.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

2. Educational Background and Business Experience

- Name William McConville
- Date of Birth July 16, 1964
- Formal Education – High School, College, Graduate School, Other
 - High School 1982 - North Shore High School on Long Island, NY
 - College 1986 - Baldwin-Wallace College in Berea OH,
B.A. Business Administration
 - Other N/A

- Business Background – Prior Five Years

The Advisor Representative, William McConville was born on July 16, 1964 in Islip, NY, is a 1982 graduate of North Shore High School on Long Island and graduated from Baldwin-Wallace College in Berea OH in 1986 with a B.A. in Business Administration. He has worked as a FINRA Registered Financial Advisor since June of 2001. He also works as an Account Executive at J.N. Savasta Corp. located at 1350 Broadway, Suite 410, New York, NY 10018. Mr. McConville has four children.

Summary of Prior Employment:

10/30/2015 - 06/04/2019

WELLS FARGO CLEARING SERVICES, LLC (CRD#:19616)

WEST PALM BEACH, FL

09/14/2012 - 11/03/2015

PNC INVESTMENTS (CRD#:129052)

PALM CITY, FL

08/26/2010 - 09/10/2012

CHASE INVESTMENT SERVICES CORP. (CRD#:25574)

VERO BEACH, FL

06/01/2009 - 08/23/2010

MORGAN STANLEY SMITH BARNEY (CRD#:149777)

VERO BEACH, FL

08/22/2008 - 06/01/2009

MORGAN STANLEY & CO. INCORPORATED (CRD#:8209)

VERO BEACH, FL

06/18/2001 - 09/24/2003

WHITE MOUNTAIN CAPITAL, LLC (CRD#:104123)

NEW YORK, NY

3. **Disciplinary Information** – None

4. **Other/Outside Business Activity**

Mr. McConville works as an account executive at J.N. Savasta Corp., located at 1350 Broadway, Suite 410, New York, NY 10018. J.N. Savasta Corp. is a successful mid-size Corporate Benefits Consult and Insurance Brokerage. His primary activity centers around cross-selling that firm's insurance clients with Quint Capital Investment Management products and services, so that activity is directly related to the investment activity conducted at Quint Capital. Mr. McConville does not have any other outside business activity.

5. **Additional Compensation**

Mr. McConville is compensated by Quint Capital for all Investment Management related activity in consideration of his association with Quint Capital and J.N. Savasta Corp. He receives a modest monthly salary from J.N. Savasta Corp. There is nothing in this arrangement that would constitute a conflict of interest with any Investment Management client.

6. **Supervision**

All prospective client transactions are presented to the firm's CCO, Alexander N. Quint - (212) 682 5090 - prior to execution. Quint and McConville discuss in detail the advice offered to clients that may result in these transactions, including but not limited to; (a) client objectives; (b) risk factors; and (c) suitability.

Please refer to the Quint Capital Written Supervisory Procedures (WSP) for a detailed description of the supervisory process applicable to the Advisor Representative.

Supervisor Contact Information:

Alexander N. Quint
Chief Compliance Officer (CCO)
Quint Capital Corporation
230 Park Avenue – Suite 908
New York, NY 10169-0499
(212) 682 5090 – W
(917) 885 6731 - M
aquint@quintcapital.com
www.quintcapital.com

7. **Legal History - None**

Part 2B of Form ADV: Brochure Supplement – Joshua Galanter

1. **Cover Page – General Information Regarding Registered Advisor Representatives**

- | | |
|---------------------|----------------------------------------------------|
| a. Name | Joshua Galanter |
| b. Business Address | 230 Park Avenue, Suite 908 New York, NY 10169-0499 |
| c. Phone Number | (212) 682-5090 |
| d. Firm Name | Quint Capital Management, LLC |
| e. Business Address | 230 Park Avenue, Suite 908 New York, NY 10169-0499 |

- f. Phone Number (212) 682-5090
- g. Date of Supplement 02/20/2020
- h. Statement - This brochure supplement provides information about Joshua Galanter that supplements the Quint Capital Management brochure. You should have received a copy of that brochure. Please contact Alexander Quint, President of Quint Capital Management if you did not receive Quint Capital Management’s brochure or if you have any questions about the contents of this supplement. Additional information about Joshua Galanter is available on the SEC’s website [atwww.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

2. Educational Background and Business Experience

- a. Name Joshua Galanter
- b. Date of Birth March 28,1962
- c. Formal Education – High School, College
 - High School 2013 – NYC Lab School
 - College 2017 – Rutgers – State University of New Jersey
BS in Communications
- d. Business Background – Prior Five Years
- e. Professional Designations and Minimum Qualification for Designation

The Advisor Representative, Mr. Galanter was born on March 18, 1995 in New York City, NY. He graduated Rutgers, State University of New Jersey in 2017 with a BS in Communications and a Minor in Entrepreneurship. At Rutgers, he participated in the Rutgers Entrepreneurial Society and LIBOR – Little Investment Bankers of Rutgers. He has worked as a Registered Financial Advisor at Quint Capital Corporation since December 2018. This is his first job in the Securities Industry. Prior to that, he worked at Marbrose Realty from June to December 2017, Quint Capital Corporation as an intern from June to August 2016, Seamless Docs from June to August 2015. He resides at 105 Fifth Avenue in New York and is not married.

06/2017 – 12/2017	Marbrose Realty, Inc.	Assistant Property Manager
06/2016 – 08 2016	Quint Capital Corporation	Intern - Investments
06/2015 – 08 2015	Seamless Docs	Intern - Technology

3. Disciplinary Information – None

4. Other/Outside Business Activity

Mr. Galanter is the owner of a consulting company, Galanter Capital LLC, which has no revenue currently. He has no outside income of any kind, with his sole source of income derived from his engagement with Quint Capital. Therefore, Mr. Considine has no material conflicts of interest that would adversely affect any of his clients.

5. Additional Compensation

Mr. Galanter does not receive compensation whatsoever from any activity outside of that associated with Quint Capital Management. No other compensation includes salary, bonuses, prizes, etc.

6. Supervision

All prospective client transactions are presented to the firm’s CCO, Alexander N. Quint - (212) 682 5090 - prior to execution. Quint and Galanter discuss in detail the advice offered to clients

that may result in these transactions, including but not limited to; (a) client objectives; (b) risk factors; and (c) suitability.

Please refer to the Quint Capital Written Supervisory Procedures (WSP) for a detailed description of the supervisory process applicable to the Advisor Representative.

Supervisor Contact Information:

Alexander N. Quint
Chief Compliance Officer (CCO)
Quint Capital Corporation
230 Park Avenue – Suite 908
New York, NY 10169-0499
(212) 682 5090 – W
(917) 885 6731 - M
aquint@quintcapital.com
www.quintcapital.com

7. Legal History - None

Part 2B of Form ADV: Brochure Supplement – Michael Lawrence Rule

1. Cover Page – General Information Regarding Registered Advisor Representatives

- a. Name Michael Rule
- b. Business Address 230 Park Avenue, Suite 908 New York, NY 10169-0499
- c. Phone Number (212) 682-5090
- d. Firm Name Quint Capital Management, LLC
- e. Business Address 230 Park Avenue, Suite 908 New York, NY 10169-0499
- f. Phone Number (212) 682-5090
- g. Date of Supplement 02/20/2020
- h. **Statement** - This brochure supplement provides information about Michael Rule that supplements the Quint Capital Management brochure. You should have received a copy of that brochure. Please contact Alexander Quint, President of Quint Capital Management if you did not receive Quint Capital Management’s brochure or if you have any questions about the contents of this supplement. Additional information about Michael Rule is available on the SEC’s website [atwww.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

2. Educational Background and Business Experience

- a. Name Michael Rule
- b. Date of Birth March 28,1964
- c. Formal Education – High School 1982 – Lansingburgh High School
College 1987 – State University of New York at Albany
BS Economics
- d. Business Background – Prior Five Years

03/10/2010 - 04/27/2015

APB FINANCIAL GROUP, LLC (CRD#:38235)

NEW YORK, NY

12/19/2007 - 05/01/2009

TALLEY & COMPANY (CRD#:29203)

NEWPORT BEACH, CA

03/02/2001 - 12/03/2007

VISION (CRD#:47927)

NEW YORK, NY

05/05/2000 - 01/29/2001

RM STARK & CO INC. (CRD#:7612)

LAKE WORTH BEACH, FL

01/08/1999 - 04/23/1999

DALTON KENT SECURITIES GROUP, INC. (CRD#:38813)

NEW YORK, NY

05/20/1998 - 12/31/1998

J.P. TURNER & COMPANY, L.L.C. (CRD#:43177)

ATLANTA, GA

08/23/1997 - 01/29/1998

NICHOLS, SAFINA, LERNER & CO. INC. (CRD#:35476)

NEW YORK, NY

11/07/1996 - 04/17/1997

PRUDENTIAL SECURITIES INCORPORATED (CRD#:7471)

NEW YORK, NY

02/25/1994 - 10/30/1996

SMITH BARNEY INC. (CRD#:7059)

NEW YORK, NY

05/19/1992 - 03/03/1994

PAINEWEBBER INCORPORATED (CRD#:8174)

WEEHAWKEN, NJ

The Advisor Representative, Mr. Rule was born on March 6, 1964 in Troy, NY. He graduated Lansingburgh High School in 1982 and the State University of New York at Albany in 1987 with a BS in Economics. At Albany, he was a member of the varsity football team. Mr Rule played with the Miami Dolphins football organization in 1987. He has worked as a Registered Financial Advisor at Quint Capital Corporation since May 2015.

3. Disciplinary Information

Incident - Rule was accused of modifying a document sent to his firm. The document was a simple mutual fund liquidation request made by the customer involving a transaction that resulted in no fees or commissions. He believes the allegation was erroneous since any document sent to the firm would have been routed to the operations or compliance area and would never have been directed to him personally. Therefore, there was no possibility that this allegation could have occurred since he never came into contact with the document. Unfortunately, this single incidence has set of a series of subsequent events that have plagued him for over twenty years.

Maryland - Rule resigned from Dalton Kent in 1999. Two weeks after his resignation, Maryland contacted Dalton Kent to request an Order to Show Cause concerning this incident and suggested that he request a hearing with the State of Maryland. This was a

full fifteen days after he had left the firm. Maryland never contacted Rule directly and Dalton Kent never responded to Maryland or contacted him directly. He had no knowledge that any inquiry had been initiated, so he had no opportunity to defend himself. As a result, he was suspended from the State of Maryland for non-response. Had he been informed of the request from Maryland or his employer, he certainly would have responded to it, however he never had the opportunity to do so.

South Carolina – On July 14, 1998 Rule had requested registration in South Carolina. A request from the South Carolina Securities Division for information, directed to the Compliance Department of JP Turner & Company, his employer at that point, went unanswered. South Carolina barred him from the state for three years, once again due to the oversight of this firm’s compliance department. The firm recognized and apologized for their mistake but the damage had been done. South Carolina stated: “FAILURE TO RESPOND TO DIVISION’S REQUEST FOR INFORMATION IN CONNECTION WITH MR. RULE’S APPLICATION FOR REGISTRATION AS AN AGENT IN SC.” Rule communicated with South Carolina to contest the issue, but to no avail. South Carolina did recognize that this was not his error and also stated when he had reapplied: MR. RULE HONORED HIS COMMITMENTS SET FORTH IN THE 8/27/1998 CONSENT ORDER. THE 7/14/1998 ORDER OF DENIAL NO LONGER CONSTITUTES A BAR TO REGISTRATION IN SC. CONTACT SC SECURITIES DIVISION (803) 734-4731.

NYSE Division of Enforcement - 1/6/1999 - NYSE allegations stated “Using Margin Without the Customer’s Consent.” Rule believed these allegations were erroneous. His employer at the time was Prudential Securities, a large and prominent firm. It would simply have been impossible to engage in margin transactions at a firm like this without having executed margin papers on file. The firm’s automated “system” would have rejected the trade with no margin papers on file. Additionally, no compliance officer would ever override the system and allow the trade to occur without these executed margin documents. Rule’s attorney told him to consent to a censure since he was no longer going to represent him. Rule was unable to continue to pay his very substantial legal fee. Unfortunately, rule was young and inexperienced at the time and fell victim to a suboptimal set of circumstances.

4. **Other/Outside Business Activity**

Mr. Rule does not receive compensation whatsoever from any activity outside of that associated with Quint Capital Management. No other compensation includes salary, bonuses, prizes, etc.

5. **Supervision**

All prospective client transactions are presented to the firm’s CCO, Alexander N. Quint - (212) 682 5090 - prior to execution. Quint and Rule discuss in detail the advice offered to clients that may result in these transactions, including but not limited to; (a) client objectives; (b) risk factors; and (c) suitability.

Please refer to the Quint Capital Written Supervisory Procedures (WSP) for a detailed description of the supervisory process applicable to the Advisor Representative.

Supervisor Contact Information:

Alexander N. Quint
Chief Compliance Officer (CCO)
Quint Capital Corporation
230 Park Avenue – Suite 908
New York, NY 10169-0499
(212) 682 5090 – W
(917) 885 6731 - M
aquint@quintcapital.com
www.quintcapital.com

6. **Legal History** - None