

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

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

Form ADV 2A Disclosure Brochure

June 12, 2023

This brochure provides information concerning the qualifications and business practices of Quint Capital Corporation d/b/a Quint Capital Management LLC (“QCM” or the “Firm”). If you have any questions about the contents of this brochure, please contact us at compliance@qintcapital.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.

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. Additional information about Quint Capital Management is available on the SEC’s website at www.adviserinfo.sec.gov.

Quint Capital Management is registered in **New York, New Jersey, Connecticut, and Florida.**

Each registered adviser must provide advisory clients with a brochure and brochure supplements with clearly written, meaningful, current disclosure in a standard format. Please consider the oral and written communications we provide to you, including this brochure, as you decide to hire us or manage your ongoing relationship with us.

ITEM 2. MATERIAL CHANGES

The Material Changes section of this brochure will be updated annually, or when material changes occur since the previous release of the Firm Brochure. This brochure, dated June 12, 2023, updates and replaces the amendment filed May 17, 2023. The following material changes were made since our last annual amendment in March 2023:

- Due to Alexander Quint's temporary regulatory suspension of his Series 24 Supervisory Authority, which is in effect from April 20, 2023, to August 19, 2023, Alex has temporarily stepped down from all supervisory and compliance related duties of the advisory and broker-dealer activities. Rene Ramirez served as the interim Chief Compliance Officer and will be supervising the advisory business. Any questions or concerns related to sales supervision should be directed to Rene Ramirez at (212) 682 5090 or rramirez@quintcapital.com.
- Effective June 1, 2023, Kathy J. Kuria has joined the firm as the Chief Compliance Officer. Any compliance related matters should be directed to kkuria@quintcapital.com or compliance@quintcapital.com.

Item 3 – Table of Contents

- Item 2. Material Changes..... 2
- Item 3. Table of Contents.....3
- Item 4. Firm Description: Advisory 4
- Item 5. Fees and Compensation..... 5
- Item 6. Performance-Based Fees 6
- Item 7. Types of Clients 7
- Item 8. Methods of Analysis, Investment Strategies and Risk of Loss 7
- Item 9. Disciplinary Information 9
- Item 10. Other Financial Industry Activities And Affiliations 9
- Item 11. Code of Ethics, Participation or Interest in Client Transactions and Personal Trading 10
- Item 12. Brokerage Practices 10
- Item 13. Review Of Accounts 11
- Item 14. Client Referrals and Other Compensation 12
- Item 15. Custody 13
- Item 16. Investment Discretion..... 14
- Item 17. Voting Client Securities..... 15
- Item 18. Financial Information..... 15
- Item 19. Requirements For State – Registered Advisors.....15
 - ADV 2B: Brochure Supplement.....17

ITEM 4. FIRM DESCRIPTION: ADVISORY

GENERAL

Quint Capital Corporation ("QCAP") is dually registered; as a registered investment adviser and broker dealer. QCAP d/b/a Quint Capital Management ("QCM"), is a state registered investment advisor. QCM accounts are custodied at The Royal Bank of Canada (RBC), the custody and clearing firm for QCAP, the broker dealer.

QCM also utilizes the name Legacy Trust Advisors, founded in 1989, and acquired by QCAP Holdings, LLC in 2015. QCAP Holdings LLC, is the parent company of QCM and is 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.

TYPES OF ADVISORY SERVICES

QCM provides both discretionary and non-discretionary investment advice, asset allocation and related asset management services to separate account clients and institutional investors. Services include Portfolio Management, Pension Consulting services, and Selection of other advisers (including private fund managers).

QCM provides clients with specific investment recommendations to achieve a suitable investment plan designed to meet short and long-term objectives. In addition, QCM 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.

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

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

ASSETS UNDER MANAGEMENT

As of December 2022, QCM manages approximately \$70 million in assets for approximately 100 clients. Currently, all funds are managed on a discretionary basis.

TAILORED RELATIONSHIPS

QCM assesses each client's needs (e.g., tax situation, diversification needs, other assets held, liquidity needs, etc.) to determine the appropriate asset allocation among accounts. Clients communicate financial objectives by completing Client Profile and through periodic reviews, advisory meetings, and other correspondence. Objectives are tracked via written meeting agendas with each client.

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. QCM aims to help you achieve your goals by assisting with the investment aspects of these goals in a professional and workmanlike manner.

Clients may designate in an Investment Policy Statement, securities in the account that cannot be sold, and/or specify restrictions on investing in certain securities or types of securities. Assets that may not be sold will be held in a non-discretionary, fee account.

ITEM 5. FEES AND COMPENSATION

DESCRIPTION

QCM generally manages assets for advisory clients on a discretionary basis. However, clients may also have assets that are managed on a non-discretionary basis that are also subject to a management fee. Quarterly fees for portfolio management are based on a percentage of the value of the investments under management or a fixed annual fee, payable quarterly in arrears.

The standard fee is up to 50 basis points per quarter or two percent (2%) per year, including all sub-advisory fees. Total fees will not exceed three percent (3%) of assets.

Exceptions to the established fee schedule can 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 services.

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.

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

FEE BILLING

Investment management fees are usually billed quarterly in arrears, based on the value of a client's accounts under management at the end of the preceding quarter. In consideration of very specific circumstances, the firm has the ability to bill fees in advance. As this special arrangement requires more operational oversight, it will be accommodated on a limited basis.

Fees are deducted from the account(s) managed by QCM. The client must consent in advance to direct debiting of their investment account as per the Engagement Letter for Investment Advisory Services. QCM sends the 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 are received in several installments during the initial quarter), or for existing accounts when unusually large deposits or withdrawals occur during a quarter, will 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 during which the substantial deposit was under QCM'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 QCM's services, any fees paid more than 60 days in advance for the then-current quarter are refundable, on a pro rata basis. The client has the option to opt out of the QCM agreement if Form ADV 2A has not been provided within 48 hours prior to execution of the advisory agreement.

OTHER FEES

Clients are responsible for certain other fees and expenses such as custodial fees, brokerage commissions, and similar charges associated with maintained accounts at a qualified custodian. If client assets are invested in pooled investment vehicles such as a mutual fund, ETF or private fund, the client will also bear the additional fees and expenses assessed by such funds with respect to the client's investment. Underlying fund fees and expenses compensate the fund manager and other service providers of the fund and/or arise in connection with the operation and investment activities of the fund. These costs are separate from, and in addition to, the fees paid to QCM for selecting and monitoring the investments. QCM's fees will not be reduced, credited, or deferred as a result of the underlying fund fees and expenses assessed by a mutual fund, ETF, or private fund. Underlying fund fees and expenses are fully disclosed in each fund prospectus or PPM received by each investor in the pooled vehicle.

QCM does not control or receive any portion of these transaction fees. Supervised persons cannot accept compensation for the sale of securities and other investment products. QCAP, the affiliated broker-dealer, does receive a portion of some of the fees and therefore a conflict of interest does exist when QCM accounts are opened through QCAP an introducing broker-dealer and held at a qualifying custodian.

Clients must consent to any principal trades in writing prior to the trades being executed. For principal trades clients will pay a commission/mark-up or mark/down. These assets are NOT included in the assets under management for fee calculation purposes.

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. As noted in the previous section, these fees are in addition to the fees paid by you to QCM.

Some mutual funds have various share "classes" with different expense ratios for each class. QCM does not control any portion of these fees. Preference is given to mutual funds that do not have a sales charge or 12b-1 fees. Any mutual funds that have a sales charge will not be included in the calculation of assets under management. 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.

QCM does not receive any portion of fund management or 12b-1 fees.

PAST DUE ACCOUNTS AND TERMINATION OF AGREEMENT

QCM reserves the right to stop work on any account that is more than 60 days overdue. The Firm will take this action only after it has made attempts to reach the client and written notification has been provided.

ITEM 6. PERFORMANCE-BASED FEES

No portion of QCM's fee is computed based on the capital gains on, or capital appreciation of, the funds

or any portion of the funds managed for a client. QCM does not use a performance-based fee structure because of the potential conflict of interest. Performance-based compensation can create an incentive for the adviser to recommend an investment that carries a higher degree of risk to the client.

ITEM 7. TYPES OF CLIENTS

DESCRIPTION

QCM generally provides wealth management, investment advice and investment management services to individuals, high net worth individuals, pensions and profit-sharing plans, corporations and others such as trust accounts. 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 can pay a higher percentage rate on their annual fees than the fees paid by clients with greater assets under management.

QCM has the discretion to waive or reduce the account minimum and fee. Accounts of less than \$10,000 can be set up when the client and the advisor anticipate the client expects to add additional funds to the accounts bringing the total to \$10,000 within a reasonable time. Other exceptions will apply to employees of QCM and their relatives, or relatives of existing clients, or other circumstances by QCM on a case-by-case basis.

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

METHODS OF ANALYSIS

The main sources of securities information used by QCM 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 QCM, or by the funds or portfolio managers used by QCM, 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, QCM 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.

QCM does analyze, evaluate, and recommend the initial and continued use of independent individuals, firms and institutions that provide investment management services for certain of QCM's clients. Often referred to as "Separate Account Managers" (SAMs). These organizations can serve as sub-advisors for certain clients' accounts. QCM will provide overall direction and supervision on such SAM accounts as well as monitor performance and continued adherence to the targeted investment style.

QCM will only engage in margin transactions with the client's consent. However, margin account balances that occur in an account due to a withdrawal of cash by a client must be covered by the sale of securities in the account. On occasion the margin balance can 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 can 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. Investing in securities involves risk of loss that you should be prepared to bear. We do not represent or guarantee that our services or methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to market corrections or declines. We cannot offer any guarantees or promises that your financial goals and objectives will be met. Past performance is in no way an indication of future performance.

Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks:

- **Interest-Rate Risk:** Fluctuations in interest rates can 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 can drop in reaction to tangible and intangible events and conditions independent of the security itself. For example, political, economic and social conditions can 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.
- **Reinvestment Risk:** This is the risk that future proceeds from investments 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 can result in bankruptcy and/or a declining market value.

- **Complex Product Risk:** Complex products include more than one risk, from any embedded features of any such as structured products, equity-indexed annuities, leveraged and inverse exchange-traded funds (ETFs), principal protected notes, reverse convertibles and commodity future-linked securities. These products are not suitable for all clients or all investment strategies. This risk of loss is potentially higher with complex products.

ITEM 9. DISCIPLINARY INFORMATION

QCM has not been involved in any material legal or disciplinary events related to past or present investments or clients. Some of the Investment Advisor Representatives (“IAR”) do have material legal or disciplinary events related to past or present investments or clients that are detailed in the IAR’s ADV Part 2B Brochure Supplement.

ITEM 10. OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

FINANCIAL INDUSTRY ACTIVITIES

Quint Capital Management LLC is the Registered Investment Advisor owned by QCAP Holdings LLC. QCAP Holdings also owns Quint Capital Corporation, a securities Broker-Dealer, member of FINRA and SIPC member. Most QCM accounts are held at The Royal Bank of Canada (RBC), the custody and clearing firm for Quint Capital Corp.

To summarize, the firms that Quint Capital Management LLC is 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) |

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

AFFILIATIONS

QCM 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. QCM is affiliated with Quint Capital, an introducing broker-dealer to other qualified custodians.

ITEM 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 QCM. The Code is based upon the principle that QCM and its employees owe a fiduciary duty to QCM'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 if 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.

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

TRANSACTIONS

It is the expressed policy of QCM that no principal or IAR shall 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 trading ahead of the client.

No principal or IAR shall prefer his or her interest to that of an advisory client. If 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. Principals and IARs can either receive fees or commissions/transactional fees on an account they cannot receive both.

PERSONAL TRADING

Personal trading is reviewed on a quarterly basis. Personal trading reviews are intended to ensure that the personal trading of employees does not affect the markets, and that employees of QCM do not receive preferential treatment relative to clients. Since most employee trades are small mutual fund trades or exchange-traded fund trades, the trades are not of significant enough value to affect the securities markets.

ITEM 12. BROKERAGE PRACTICES

SELECTING BROKERAGE FIRMS

Specific custodian recommendations are made to clients based on their need for such services. QCM recommends custodians based on the proven integrity and financial responsibility of the recommended firm and the best execution of orders at reasonable commission rates. QCM is under common ownership and control with Quint Capital Corporation, an introducing broker-dealer. QCM requires all clients to designate a broker or dealer to be used for all transactions. QCM recommends that clients use RBC Capital Markets as custodian, in most cases. However, Quint Capital Corporation may benefit from QCM accounts, which causes a conflict of interest, so clients are free to choose other custodians.

QCM personnel cannot receive fees or commissions from any of these arrangements. Any costs charged to the client in addition to the management fees will be disclosed to the client in writing prior to the transaction being executed.

QCM does not receive any portion of the fees or costs charged by RBC. Quint Capital Corporation (QCAP), the affiliated broker dealer, does receive payments from RBC for things such as credit interest and margin interest as well as commission on trades done on the broker dealer side of the business.

QCM can accept client instructions for directing the client's brokerage transactions to a particular broker-dealer. For some clients, QCM advises on assets in clients' employers' Qualified Retirement Plans, where the clients' firm designates the custodial arrangement.

In those cases where a client designates a specific broker-dealer, QCM does not always have authority to negotiate commissions, best execution in some cases cannot be achieved, and there can be a disparity in commission charges between clients.

BEST EXECUTION

QCM, 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.

QCM 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 RBC Capital Markets 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.

QCM does not receive any portion of the trading fees, but its affiliate QCAP does receive payments from RBC from various credit products, i.e., margin balances.

QCM conducts periodic reviews of RBC Capital Markets brokerage and best execution practices, evaluates services and documents these reviews.

SOFT DOLLARS

QCM, 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

QCM 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.

ITEM 13. REVIEW OF ACCOUNTS

PERIODIC REVIEWS

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

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 Rene Ramirez on at least an annual basis.

REVIEW TRIGGERS

Meeting frequency and discussion topics vary depending upon the client's circumstances and market conditions. Triggers for additional meetings include but are not limited to factors such as:

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

REGULAR REPORTS

QCM's Custodian 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.

ITEM 14. CLIENT REFERRALS AND OTHER COMPENSATION

REFERRALS FROM PROMOTERS (FORMERLY SOLICITORS)

QCM does not currently utilize promoters. In the event that QCM elects to utilize a promoter, including current clients, estate planning attorneys, accountants, personal friends of employees and other similar sources, the firm will ensure that procedures are in place to comply with regulation and disclosure requirements.

COMPENSATION RECEIVED BY QCM

QCM acts as a promoter for other professionals when a prospect or client is referred to them. This is disclosed to the client at the time the investment management agreement is signed.

OTHER COMPENSATION

QCM participates in institutional service programs with RBC Capital Markets. 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 QCM 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 can waive stated minimum initial investments or which are only be available to customer of institutional clients. QCM has access to certain share classes, typically called Class I shares, which are unavailable to others because QCM 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 are not always 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 include cocktail receptions, meals, and entertainment. Air and/or ground transportation to and from the conference and lodging are sometimes 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 QCM 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 are not 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 can invest funds on behalf of clients or be evaluating for future investments. These meetings do not obligate QCM or its advisors to use these investments and are not based upon specific sale production for those products.

QCM will ensure any promoter or persons referring clients complies with the requirements of SEC Rule 206 and that clients are notified in writing of this agreement at or prior to the time and Investment management agreement is signed.

ITEM 15. CUSTODY

QCM does not maintain physical custody of any client assets as all assets are maintained by qualified custodians. The term "custody" is broadly defined by the SEC. QCM performs certain activities, debiting advisory fees and facilitating money movement on behalf of the client, which result in QCM being deemed to have inadvertent custody.

Debiting of fees: The Firm is deemed to have custody of client funds and securities because it is given the authority to debit client accounts for payment of advisory fees. As such, client funds and securities are maintained at one or more qualified custodians. Such custodians will send out statements to clients at least once per calendar quarter that typically detail any transactions in such account for the relevant period.

Wire Transfer and/or Standing Letter of Authorization: In response to Client requests for assistance with third-party wire and other asset-transfer requests, QCM can operate under a standing letter of authorization or instruct Custodians on a Client's instruction to move assets to third parties. In these cases, the Firm is deemed to have "custody" of Client assets within the meaning of Advisers Act Rule

206(4)-2 (the “**Custody Rule**”). However, we do not have to obtain a surprise annual audit, as we otherwise would be required to by reason of having custody, if the following criteria are met:

1. You provide a written, signed instruction to the qualified custodian that includes the third party's name and address or account number at a custodian;
2. You authorize us in writing to direct transfers to the third party either on a specified schedule or from time to time;
3. Your qualified custodian verifies your authorization (e.g., signature review) and provides a transfer of funds notice to you promptly after each transfer;
4. You can terminate or change the instruction;
5. We have no authority or ability to designate or change the identity of the third party, the address, or any other information about the third party;
6. We maintain records showing that the third party is not a related party to us nor located at the same address as us; and
7. Your qualified custodian sends you, in writing, an initial notice confirming the instruction and an annual notice reconfirming the instruction. We hereby confirm that we meet the above criteria.

ACCOUNT STATEMENTS

The Custodian will send the Client periodic account statements (monthly in the case of account activity, and at least quarterly) indicating the amounts of any funds or securities in the Account as of the end of the statement period and any transactions in the Account during the statement period. A Client should review these statements carefully. Additionally, a Client should contact the Firm immediately if Account statements are not received from the Account Custodian on at least a quarterly basis.

PERFORMANCE REPORTS

Clients are provided with quarterly performance reports that are generated by the custodian.

ITEM 16. INVESTMENT DISCRETION

DISCRETIONARY AUTHORITY FOR TRADING

QCM 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). An Investment Advisor Representative of QCM 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 is 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), QCM 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 types of securities, QCM 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.

QCM 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, QCM 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.

ITEM 17. VOTING CLIENT SECURITIES

QCM 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.

ITEM 18. FINANCIAL INFORMATION

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

QCM has not been the subject of a bankruptcy petition at any time during the past ten years.

ITEM 19. REQUIREMENTS FOR STATE – REGISTERED ADVISORS

Alexander N. Quint is the owner of both Quint Capital Corporation (QCC), a FINRA registered Broker-Dealer, and Quint Cap Insurance Agency; and the sole Managing Member of QCAP Holdings LLC (QCAP), the Holding Company for QCC, QCM, and Quint Capital. Mr. Quint designates 40% of his time to QCM; and 60% to QCC, QCAP and Quint Cap insurance agency.

Mr. Ramirez is the Sales Supervisor for both Quint Capital Corporation and Quint Capital Management.

ALEXANDER N. QUINT

1. Cover Page – General Information Regarding Registered Advisor Representatives

Born: 1958
Business Address: 230 Park Avenue, Suite 460
New York, NY 10169
Phone Number: (212) 682-5090

2. Educational Background and Business Experience

University of Buffalo, Buffalo NY
Master of Business Administration, Finance 1982
Bachelor of Science (BS), Business and Administration 1981
Magna Cum Laude, National Honor Society

<i>Quint Capital Corporation</i> Managing Member and Founder	2013 to Present
<i>Quint, Miller & Co., Inc. - Peterson Investments Inc.</i> Principal and Founder	2000 to-2012
<i>Canadian Imperial Bank of Commerce (CIBC)</i> Executive Director	June 1997- June 2000
<i>Salomon Smith Barney</i> Senior Vice President – Senior Vice President	August 1992 to July 1997
<i>UBS Paine Webber</i> Senior Vice President	November 1983 to August 1992

RUBEN RENE RAMIREZ

1. General Information Regarding Registered Advisor Representatives

Born: 1972
 Business Address: 230 Park Avenue Suite 908
 New York, NY 10169
 Phone: 212-682-5090

2. Educational Background and Business Experience

<i>Quint Capital Corporation/Quint Capital Management</i> Chief Executive Officer	September 2022 to Present
<i>Fortitude Advisory Group</i> Investment Adviser Representative	June 2019 to Present
<i>Eagles Coast</i> Registered Representative	July 2019 to Sept 2022
<i>LPL Financial</i> Financial Advisor	Jan 2017 to April 2019

3. Disciplinary Information

On February 14, 2023, A letter of Acceptance, Waiver and Consent (AWC) was filed with FINRA for a violation of Article III, Section 3(b) of FINRA’s By-Laws, FINRA Rules 8311 and 2010, and MSRB Rules G-4 and G-5 and MSRB Rules G-2 and G-3. Mr. Quint was fined \$10,000 and issued a five-month suspension of principal capacities effective March 20, 2023, through August 20, 2023.

Please visit [FINRA BrokerCheck](#) for additional information concerning Mr. Quint.

PART 2B OF FORM ADV: BROCHURE SUPPLEMENT

INVESTMENT ADVISER REPRESENTATIVES

This brochure supplement provides information about the firm's representatives. You should have received a copy of the ADV 2A, Disclosure Brochures along with this brochure supplement. Please contact compliance@quintcapital.com 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 the firm and each representative is available on the SEC's website at www.adviserinfo.sec.gov.

ALEXANDER N. QUINT

1. General Information Regarding Registered Advisor Representatives

Born: 1958
Business Address: 230 Park Avenue, Suite 460
New York, NY 10169
Phone Number: (212) 682-5090

2. Educational Background and Business Experience

University of Buffalo, Buffalo NY

Master of Business Administration, Finance 1982

Bachelor of Science (BS), Business and Administration 1981

Magna Cum Laude, National Honor Society

Quint Capital Corporation 2013 to Present
Managing Member and Founder

Quint, Miller & Co., Inc. - Peterson Investments Inc. 2000 to-2012
Principal and Founder

Canadian Imperial Bank of Commerce (CIBC) June 1997- June 2000
Executive Director

Salomon Smith Barney August 1992 to July 1997
Senior Vice President – Senior Vice President

UBS Paine Webber November 1983 to August 1992
Senior Vice President

3. Disciplinary Information

On February 14, 2023, A letter of Acceptance, Waiver and Consent (AWC) was filed with FINRA for a violation of Article III, Section 3(b) of FINRA’s By-Laws, FINRA Rules 8311 and 2010, and MSRB Rules G-4 and G-5 and MSRB Rules G-2 and G-3. Mr. Quint was fined \$10,000 and issued a five-month suspension of principal capacities effective March 20, 2023, through August 20,

Please visit [FINRA BrokerCheck](#) for additional information concerning Mr. Quint.

4. Other/Outside Business Activity

Mr. Quint serves as an unpaid board member of the 5th Avenue Loft Corporation in New York City.

Mr. Quint serves as an unpaid board member for the Lower Westside Household Services Corporation.

Mr. Quint advises them on their 401-k plan for which he is compensated through Quint Capital Corporation, the broker-dealer. He advises them on a supplemental benefit plan for which he is compensated through Quint Capital Insurance Agency.

Mr. Quint serves as an unpaid board member for the Dennelisse Corp. Mr. Quint advises them on their 401-k plan for which he is compensated through Quint Capital Corporation, the broker dealer. He advises them on a supplemental benefit plan for which he is compensated through Quint Capital Insurance Agency. and Quint Capital Insurance.

5. Additional Compensation

Mr. Quint does not receive compensation at all for any activity outside of that associated with Quint Capital, which includes its broker-dealer, registered investment advisor and insurance agency.

6. Supervision

All prospective client transactions are reviewed by Rene Ramirez - (212)6825090 - Mr. Ramirez reviews in detail the advice offered to clients that result in these transactions, including but not limited to; (a) client objectives; (b) risk factors; and (c) suitability.

7. Legal History - None

RUBEN RENE RAMIREZ

1. General Information Regarding Registered Advisor Representatives

Born: 1972
Business Address: 230 Park Avenue Suite 908
New York, NY 10169
Phone: 212-682-5090

2. Educational Background and Business Experience

Quint Capital Corporation/Quint Capital Management September 2022 to Present
Chief Executive Officer

Fortitude Advisory Group June 2019 to Present
Investment Adviser Representative

Eagles Coast July 2019 to Sept 2022
Registered Representative

LPL Financial Jan 2017 to April 2019
Financial Advisor

3. Disciplinary Information- NONE

4. Other/Outside Business Activity

Mr. Ramirez is the CEO and CIO of ProActive Planning Partners, LLC, a fee-based financial planning and investment advisory firm located in New York. Mr. Ramirez spends approximately 120 hours/month on this activity. ProActive Planning Partners is a dba for advisory services offered through Fortitude Advisory Group, LLC

5. Additional Compensation – No additional compensation outside of what is received in the activities listed above.

6. Supervision

To ensure thoroughness and compliance, our firm follows a robust review process for daily transactions. The sales supervisor conducts an initial review of all accounts' transactions and grants final approval.

We rely on RBC's internal "Gateway" system for customer profile data, which offers a comprehensive view of investments based on the customer's risk profile and suitability. These profiles are regularly updated, ensuring that the information we consider is current and relevant.

Our firm's professionals focus on key attributes of investments in relation to the client profile. These include:

- a. Consistency with customer risk profile and suitability.
- b. Relation to other portfolio holdings.
- c. Capacity in terms of broker-dealer (BD), registered investment advisor (RIA), and insurance.
- d. Company analysis.
- e. Industry analysis.
- f. Evaluation of experienced management.
- g. Assessment of strong financial statements.
- h. Consideration of dividends.
- i. Evaluation of competitive products.
- j. Analysis of competitive advantage.
- k. Understanding the reasons for investment.

For solicited transactions in non-fee, non-discretionary accounts, Investment Professionals first submit them to the Sales Supervisor through our internal Reg BI - SEC disclosed "Blotter" system. Transactions are only permitted after receiving explicit approval from the Sales Supervisor.

By implementing these comprehensive procedures and utilizing our internal systems and resources, we prioritize thoroughness, compliance, and aligning investments with our clients' profiles and objectives.

Name	Rene Ruben Ramirez
Title	Chief Executive Officer and Sales Supervisor
Phone	(201) 478-1176
Email	rramirez@quintcapital.com

7. Legal History -None

PATRICK J CONSIDINE

1. General Information Regarding Registered Advisor Representatives

Born: 1962
Business Address: 230 Park Avenue, Suite 908
New York, NY 10169-0499
Phone Number: (212) 682-5090

2. Educational Background and Business Experience

<i>Nassau Community College</i>	1992-2000
<i>LaGuardia Community College</i>	
<i>Quint Capital Management/Quint Capital Corp.</i> Financial Advisor	September 2018 to Present
<i>Citigroup Global Markets</i> Financial Advisor	May 2007 to October 2018
<i>Citicorp Investment Services</i> Financial Advisor	February 2003 to May 2007
<i>Merrill Lynch</i> Financial Advisor	October 2001 to March 2002

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

To ensure thoroughness and compliance, our firm follows a robust review process for daily transactions. The sales supervisor conducts an initial review of all accounts' transactions and grants

final approval.

We rely on RBC's internal "Gateway" system for customer profile data, which offers a comprehensive view of investments based on the customer's risk profile and suitability. These profiles are regularly updated, ensuring that the information we consider is current and relevant.

Our firm's professionals focus on key attributes of investments in relation to the client profile. These include:

- a) Consistency with customer risk profile and suitability.
- b) Relation to other portfolio holdings.
- c) Capacity in terms of broker-dealer (BD), registered investment advisor (RIA), and insurance.
- d) Company analysis.
- e) Industry analysis.
- f) Evaluation of experienced management.
- g) Assessment of strong financial statements.
- h) Consideration of dividends.
- i) Evaluation of competitive products.
- j) Analysis of competitive advantage.
- k) Understanding the reasons for investment.

For solicited transactions in non-fee, non-discretionary accounts, Investment Professionals first submit them to the Sales Supervisor through our internal Reg BI - SEC disclosed "Blotter" system. Transactions are only permitted after receiving explicit approval from the Sales Supervisor.

By implementing these comprehensive procedures and utilizing our internal systems and resources, we prioritize thoroughness, compliance, and aligning investments with our clients' profiles and objectives.

Name	Rene Ruben Ramirez
Title	Chief Executive Officer and Sales Supervisor
Phone	(201) 478-1176
Email	rramirez@quintcapital.com

7. Legal History - None

JAMES K. LOMBARDO

1. General Information Regarding Registered Advisor Representatives

Born: 1945
Business Address: 230 Park Avenue, Ste. 908
New York, NY 10169
Phone Number: 212 682 5090

2. Educational Background and Business Experience

<i>Polytechnic Institute of Brooklyn</i> Bachelor of Science, Aerospace Engineering	June 1963
<i>Quint Capital Management/Capital Corp.</i> Financial Advisor	January 2019 to Present
<i>Petersen Investments, Inc</i> Financial Advisor	March 2001 to January 2019
<i>Gruntal & Co., LLC</i> Financial Advisor	May 1997 to February 2001
<i>A.G. Edwards & Sons, Inc.</i> Financial Advisor	February 1990 to April 1997
<i>Jesup & Lamont, Inc.</i> Financial Advisor	February 1990 to March 1990
<i>J.T. Morgan & Co, Inc</i> Financial Advisor	March 1989 to January 1990
<i>United States Air Force</i> Honorably Discharged with the rank of Captain	June 1967-November 1971

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.

5. Additional Compensation – Mr. Lombardo also utilized the services of Bellatore Financial, Inc., of San Jose, California. Bellatore is an external advisory firm that Lombardo introduces to clients in exchange for an agreed-upon portion of the investment management fee.

6. Supervision

To ensure thoroughness and compliance, our firm follows a robust review process for daily transactions. The sales supervisor conducts an initial review of all accounts' transactions and grants final approval.

We rely on RBC's internal "Gateway" system for customer profile data, which offers a comprehensive view of investments based on the customer's risk profile and suitability. These profiles are regularly updated, ensuring that the information we consider is current and relevant.

Our firm's professionals focus on key attributes of investments in relation to the client profile. These include:

- a. Consistency with customer risk profile and suitability.
- b. Relation to other portfolio holdings.
- c. Capacity in terms of broker-dealer (BD), registered investment advisor (RIA), and insurance.
- d. Company analysis.
- e. Industry analysis.
- f. Evaluation of experienced management.
- g. Assessment of strong financial statements.
- h. Consideration of dividends.
- i. Evaluation of competitive products.
- j. Analysis of competitive advantage.
- k. Understanding the reasons for investment.

For solicited transactions in non-fee, non-discretionary accounts, Investment Professionals first submit them to the Sales Supervisor through our internal Reg BI - SEC disclosed "Blotter" system. Transactions are only permitted after receiving explicit approval from the Sales Supervisor.

By implementing these comprehensive procedures and utilizing our internal systems and resources, we prioritize thoroughness, compliance, and aligning investments with our clients' profiles and objectives.

Name	Rene Ruben Ramirez
Title	Chief Executive Officer and Sales Supervisor
Phone	(201) 478-1176
Email	rramirez@quintcapital.com

7. Legal History

Regulatory History – Investment Related - Mr. Lombardo has 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, twenty-two years prior to this Brochure Supplement. These are disclosures that involve:

- Administrative proceedings 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) disclosures items are related to only a few Research Reports issued by his Broker-Dealer employer at the time, which 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, which 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 the 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.

KURT ANTHONY STEIN

1. General Information Regarding Registered Advisor Representatives

Born: 1967
Business Address: 230 Park Avenue, Ste. 908
New York, NY 10169
Phone Number: 212 682 5090

2. Educational Background and Business Experience

University of Florida 1989
B.S. in Business Administration, Finance

Yeshiva University, Jerusalem, Israel
Graduate Studies of Talmudic Law –

Quint Capital Management/Quint Capital Corp. July 2019 to Present
Financial Advisor

Palladium Capital Advisors March 2019 to October 2019
Registered Representative

National Asset Management, Inc. March 2018 to March 2019
Investment Adviser Representative

National Securities Corporation March 2018 to March 2019
Registered Representative

Merrill Lynch March 2001 to March 2018
Financial Advisor

Goldman Sachs & Co. March 1999 to June 2001
Registered Representative

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.

5. Additional Compensation

Mr. Stein does not receive compensation for any activity outside of that associated with Quint Capital.

6. Supervision

To ensure thoroughness and compliance, our firm follows a robust review process for daily transactions. The sales supervisor conducts an initial review of all accounts' transactions and grants final approval.

We rely on RBC's internal "Gateway" system for customer profile data, which offers a comprehensive view of investments based on the customer's risk profile and suitability. These profiles are regularly updated, ensuring that the information we consider is current and relevant.

Our firm's professionals focus on key attributes of investments in relation to the client profile. These include:

- a. Consistency with customer risk profile and suitability.
- b. Relation to other portfolio holdings.
- c. Capacity in terms of broker-dealer (BD), registered investment advisor (RIA), and insurance.
- d. Company analysis.
- e. Industry analysis.
- f. Evaluation of experienced management.
- g. Assessment of strong financial statements.
- h. Consideration of dividends.
- i. Evaluation of competitive products.
- j. Analysis of competitive advantage.
- k. Understanding the reasons for investment.

For solicited transactions in non-fee, non-discretionary accounts, Investment Professionals first submit them to the Sales Supervisor through our internal Reg BI - SEC disclosed "Blotter" system. Transactions are only permitted after receiving explicit approval from the Sales Supervisor.

By implementing these comprehensive procedures and utilizing our internal systems and resources, we prioritize thoroughness, compliance, and aligning investments with our clients' profiles and objectives.

Name	Rene Ruben Ramirez
Title	Chief Executive Officer and Sales Supervisor
Phone	(201) 478-1176

7. 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.

National Financial Services A complaint has been filed regarding the suitability of direct real estate investment. 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.

WILLIAM McCONVILLE

1. General Information Regarding Registered Advisor Representatives

Born: 1964
Business Address: 230 Park Avenue, Suite 908
New York, NY 10169-0499
Phone Number: (212) 682-5090

2. Educational Background and Business Experience

<i>Baldwin-Wallace College</i> B.A. Business Administration	1986
<i>Quint Capital Management/Quint Capital Corp.</i> Financial Advisor	July 2019 to Present
<i>Vanderbilt Advisory Services</i> Financial Advisor	May 2019 to September 2019
<i>Wells Fargo Clearing Services, LLC</i> Financial Advisor	October 2015 to June 2019
<i>PNC Investments</i> Financial Advisor	September 2012 to November 2015
<i>Chase Investment Services Corp.</i> Financial Advisor	August 2010 to September 2012
<i>Morgan Stanley Smith Barney LLC</i> Financial Advisor	June 2009 to August 2010
<i>White Mountain Capital, LLC</i> Registered Representative	June 2001 to September 2003

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 Consultant 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-To ensure thoroughness and compliance, our firm follows a robust review process for daily transactions. The sales supervisor conducts an initial review of all accounts' transactions and grants final approval.

We rely on RBC's internal "Gateway" system for customer profile data, which offers a comprehensive view of investments based on the customer's risk profile and suitability. These profiles are regularly updated, ensuring that the information we consider is current and relevant.

Our firm's professionals focus on key attributes of investments in relation to the client profile. These include:

- a. Consistency with customer risk profile and suitability.
- b. Relation to other portfolio holdings.
- c. Capacity in terms of broker-dealer (BD), registered investment advisor (RIA), and insurance.
- d. Company analysis.
- e. Industry analysis.
- f. Evaluation of experienced management.
- g. Assessment of strong financial statements.
- h. Consideration of dividends.
- i. Evaluation of competitive products.
- j. Analysis of competitive advantage.
- k. Understanding the reasons for investment.

For solicited transactions in non-fee, non-discretionary accounts, Investment Professionals first submit them to the Sales Supervisor through our internal Reg BI - SEC disclosed "Blotter" system. Transactions are only permitted after receiving explicit approval from the Sales Supervisor.

By implementing these comprehensive procedures and utilizing our internal systems and resources, we prioritize thoroughness, compliance, and aligning investments with our clients' profiles and objectives.

Name	Rene Ruben Ramirez
Title	Chief Executive Officer and Sales Supervisor
Phone	(201) 478-1176
Email	rramirez@quintcapital.com

7. Legal History - None

MICHAEL LAWRENCE RULE

1. General Information Regarding Registered Advisor Representatives

Born: 1964
Business Address: 230 Park Avenue, Suite 908
New York, NY 10169-0499
Phone Number: (212) 682-5090

2. Educational Background and Business Experience

<i>State University of New York at Albany</i> Bachelor of Science, Economics	1987
<i>Quint Capital Management/Quint Capital Corp.</i> Financial Advisor	April 2015 to Present
<i>APB Financial Group, LLC</i> Registered Representative	March 2010 to April 2015
<i>Talley & Company</i> Registered Representative	December 2007 to May 2009
<i>Vision</i> Registered Representative	March 2001 to December 2007
<i>RM Stark & Co Inc.</i> Registered Representative	May 2000 to January 2001
<i>Dalton Kent Securities Group, LLC</i> Registered Representative	May 1998 to December 1998

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 off 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 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 have any 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. Additional Compensation

Mr. Rule does not receive compensation at all from any activity outside of that associated with Quint Capital.

6. Supervision

To ensure thoroughness and compliance, our firm follows a robust review process for daily transactions. The sales supervisor conducts an initial review of all accounts' transactions and grants final approval.

We rely on RBC's internal "Gateway" system for customer profile data, which offers a comprehensive view of investments based on the customer's risk profile and suitability. These profiles are regularly updated, ensuring that the information we consider is current and relevant.

Our firm's professionals focus on key attributes of investments in relation to the client profile. These

include:

- a. Consistency with customer risk profile and suitability.
- b. Relation to other portfolio holdings.
- c. Capacity in terms of broker-dealer (BD), registered investment advisor (RIA), and insurance.
- d. Company analysis.
- e. Industry analysis.
- f. Evaluation of experienced management.
- g. Assessment of strong financial statements.
- h. Consideration of dividends.
- i. Evaluation of competitive products.
- j. Analysis of competitive advantage.
- k. Understanding the reasons for investment.

For solicited transactions in non-fee, non-discretionary accounts, Investment Professionals first submit them to the Sales Supervisor through our internal Reg BI - SEC disclosed "Blotter" system. Transactions are only permitted after receiving explicit approval from the Sales Supervisor.

By implementing these comprehensive procedures and utilizing our internal systems and resources, we prioritize thoroughness, compliance, and aligning investments with our clients' profiles and objectives.

Name	Rene Ruben Ramirez
Title	Chief Executive Officer and Sales Supervisor
Phone	(201) 478-1176
Email	rramirez@quintcapital.com

7. Legal History - None

ANTHONY GERRARD GIORDANO

1. General Information Regarding Registered Advisor Representatives

Born: 1955
Business Address: 230 Park Avenue, Suite 908
New York, NY 10169-0499
Phone Number: (212) 682-5090

2. Educational Background and Business Experience

<i>Pace University</i> Bachelor of Arts, Marketing	1979
<i>Westchester Community College</i> Associate in General Studies	1975-1977
<i>Quint Capital Management/Quint Capital Corp.</i> Financial Advisor	October 20120 to Present
<i>Wells Fargo Clearing Services</i> Financial Advisor	January 2008 to October 2021
<i>A.G. Edwards & Sons, Inc.</i> Financial Advisor	March 1990 to January 2008

3. Disciplinary Information

359877 - 3/12/1989 - McLaughlin, Piven Vogel.

I formally resigned from the firm of McLaughlin, Piven and Vogel, Inc. ("MPV, Inc.") on the date in question after several years of service. The firm alleged without any credible evidence or factual support, that I "took records" that belonged to the company without firm authorization. I categorically denied his unfounded allegation at that time and shortly thereafter resigned from the firm.

MPV took the issue further and made a formal (and unfounded) complaint against me to the NYSE. A NYSE Investigator, after reviewing the allegations and the surrounding circumstances, made a final determination that Mr. McLaughlin had a vendetta against me for leaving, and the firm. As such, it was his opinion that this complaint warranted "no further action." The matter was promptly dismissed and closed without any further action by NYSE.

1878016 Edith Nissenblatt 2016 Client alleges investments were inappropriate with large amounts below investment grade. Clients also questioned why more of the same were recommended. (05/01/2001-03/07/2016). Client held the bonds. This issue is closed and is no longer reportable.
2155633 2019 – Judgement/Lien IRS This is an IRS lien for \$50,262 from a tax issue I had in 2013. At the time the markets were down, and I did not have the funds to settle this issue. The IRS put it on hold. In December 2019 they sent a letter of intent to file a lien. The current status of this lien is s still outstanding with discussions for a resolution moving forward.

1824021 2006 - Judgement/Lien 2015IRS lien for 169,265.00 Judgment/Lien has been satisfied;

completed; released. This is no longer reportable.

4. Other/Outside Business Activity- Mr. Giordano does not have outside business activity.

5. Additional Compensation- Mr. Giordano does not have any additional compensation.

6. Supervision

To ensure thoroughness and compliance, our firm follows a robust review process for daily transactions. The sales supervisor conducts an initial review of all accounts' transactions and grants final approval.

We rely on RBC's internal "Gateway" system for customer profile data, which offers a comprehensive view of investments based on the customer's risk profile and suitability. These profiles are regularly updated, ensuring that the information we consider is current and relevant.

Our firm's professionals focus on key attributes of investments in relation to the client profile. These include:

- a. Consistency with customer risk profile and suitability.
- b. Relation to other portfolio holdings.
- c. Capacity in terms of broker-dealer (BD), registered investment advisor (RIA), and insurance.
- d. Company analysis.
- e. Industry analysis.
- f. Evaluation of experienced management.
- g. Assessment of strong financial statements.
- h. Consideration of dividends.
- i. Evaluation of competitive products.
- j. Analysis of competitive advantage.
- k. Understanding the reasons for investment.

For solicited transactions in non-fee, non-discretionary accounts, Investment Professionals first submit them to the Sales Supervisor through our internal Reg BI - SEC disclosed "Blotter" system. Transactions are only permitted after receiving explicit approval from the Sales Supervisor.

By implementing these comprehensive procedures and utilizing our internal systems and resources, we prioritize thoroughness, compliance, and aligning investments with our clients' profiles and objectives.

Name	Rene Ruben Ramirez
Title	Chief Executive Officer and Sales Supervisor
Phone	(201) 478-1176
Email	rramirez@quintcapital.com

7. Legal History

2019 - Tax lien with the IRS \$50,262