Tim Travis Capital Management, LLC

Doing Business As

T&T Capital Management

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FORM ADV PART 2A
BROCHURE

This brochure provides information about the qualifications and business practices of T&T Capital Management. If you have any questions about the contents of this brochure, contact us at 805-886-8140. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority.

Additional information about T&T Capital Management (CRD # 158407) is available on the SEC's website at www.adviserinfo.sec.gov.

T&T Capital Management is a registered investment adviser. Registration with the SEC or any state securities authority does not imply a certain level of skill or training.

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Item 2 Material Changes

Form ADV Part 2 requires registered investment advisers to amend their firm brochure when information becomes materially inaccurate. If there are any material changes to an adviser's firm brochure, the adviser is required to notify you and provide you with a description of the material changes.

This amended firm brochure contains the following material changes from our previous annual updating amendment brochure dated February 5, 2016:

- Item 1 - Cover Page: This section has been amended to reflect our new home office address of 7242 E. Cortez Road, Scottsdale, AZ 85260-5459 and telephone number of 805-886-8140. Clients are reminded that all correspondence should be directed to the foregoing physical address and telephone number.
- Item 5 - Fees and Compensation: This section has been amended to reflect that certain persons providing investment advice on behalf of our firm are licensed as independent insurance agents and may receive commissions in connection with insurance products they may sell to clients. Notwithstanding the foregoing, such persons shall refrain from selling to our advisory clients insurance products for which they may receive a sales commission.
- Item 10 - Other Financial Industry Activities and Affiliations: This section has been amended to reflect that certain persons providing investment advice on behalf of our firm are licensed as independent insurance agents and may receive commissions in connection with insurance products they may sell to clients. Notwithstanding the foregoing, such persons shall refrain from selling to our advisory clients insurance products for which they may receive a sales commission.
- Items 4 and 5 - Advisory Services / Fees and Compensation: These section have been amended to disclose Financial Planning Services as a stand-alone service offered on an hourly fee basis.
- General: Our firm changed from a sole proprietorship to an LLC. There were no changes to our firm's daily operations as a result of this entity status change.
- Item 14 - Client Referrals and Other Compensation: This section has been amended to disclose that we may compensate certain individuals for client referrals.

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Item 4 Advisory Services

A. Firm Information

Tim Travis Capital Management, LLC doing business as T&T Capital Management ("T&T," "T&T Capital Management," or the "Advisor"), a limited liability company organized under the laws of the State of California, is a registered investment adviser with its primary offices located in Scottsdale, Arizona. T&T Capital Management was founded in 2011 and is owned and operated by Timothy Philip Travis. The firm's CRD Number is 158407. Mr. Travis serves as the the firm's Chief Investment Officer. This firm brochure provides information regarding the qualifications, business practices, and the advisory services provided by T&T Capital Management.

B. Advisory Services Offered

T&T Capital Management offers investment advisory services to high net worth individuals, their legacy trusts and estates (each referred to as a "Client").

Account Portfolio Management
T&T Capital Management provides customized investment advisory solutions for its Client. This is achieved through ongoing personal Client contract and interaction while providing discretionary investment management and consulting services. T&T works with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to create a portfolio allocation. T&T will then construct a portfolio, consisting of stocks, bonds, option contracts, and any other instrument deemed appropriate in view of the Client's investment profile. In some cases, T&T may open a short position in a security with potential to lose value.

T&T's investment strategy is primarily long-term, deep value, focused; however T&T may buy, sell or re-allocate positions that have been held less than one year to meet objectives of the Client or due to market conditions. T&T will construct, implement, and monitor the portfolio to ensure it meets the goals, objectives, circumstances, and risk tolerance agreed to by the Client. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to the acceptance by the Advisor.

T&T evaluates and selects securities for inclusion in Client portfolios only after applying its internal due diligence process. T&T may recommend, on occasion, redistributing investment allocations to diversify the portfolio. T&T may recommend specific positions to increase sector or asset class weightings. The Advisor may recommend employing cash positions as a possible hedge against market movement, which may adversely affect the portfolio. T&T may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, over valuation or overweighting of the position in the portfolio, change in risk tolerance of Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client's risk tolerance.

Financial Planning Services
T&T Capital Management offers financial planning services related to the Client's investment portfolio and other financial matters. Financial planning services may include recommendations for portfolio customization based on their client's investment objectives, goals and financial situation. Financial planning services may also include recommendations relating to investment strategies as well as tailored investment advice.

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For these services, it is expressly agreed by and between the parties that Client is free to follow, or disregard, in whole or in part, any recommendations, suggestions or advice made by T&T Capital Management to the Client, and that the Client may choose any advisor, brokerage firm or comparable products of the Client's choice to implement the suggestions and recommendations prepared by T&T Capital Management.

Financial planning services do not include portfolio management or supervision services. The Client may re-engage the T&T Capital Management at any time for additional advice and guidance.

Prior to rendering investment advisory services, T&T will ascertain, in conjunction with the Client, the Client's financial situation, risk tolerance and investment objectives.

C. Client Account Management

Prior to engaging T&T to provide investment advisory services, each Client is required to enter into an Investment Advisory Agreement with the Advisor that defines the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

- Establishing an Investment Policy Statement - T&T, in connection with the Client, may develop a statement that summarizes the Client's investment goals and objectives along with the broad strategy[ies] to be employed to meet the objectives. An Investment Policy Statement generally includes specific information on the Client's stated goals, time horizon for achieving the goals, investment strategies, Client risk tolerance and any restrictions imposed by the Client.
- Portfolio Construction - T&T will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision - T&T will provide investment management and ongoing oversight of the Client's portfolio and overall account.

D. Wrap Fee Programs

T&T does not manage or place Client assets into a wrap fee program. Investment management services are provided directly by T&T.

E. Assets Under Management

As of January 31, 2017, the most recent date for which such calculations are provided pursuant to securities regulations, T&T manages the following assets:

Assets Under Management	Assets
Discretionary Assets	$53,794,136
Non-Discretionary Assets	$1,313,760
Total	**$55,107,896**

Clients may request more current information at any time by contacting the Advisor.

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Item 5 Fees and Compensation

The following paragraphs detail the fee structure and compensation methodology for investment management. Each Client shall sign an Investment Advisory Agreement that details the responsibilities of T&T and the Client. Total advisory fees per client will be below 3.00% annually. As such it is possible that in some cases we might charge a higher percentage than other investment advisers but we are in compliance with SEC Rule 205 of the Investment Advisers Act of 1940.

A. Fees for Advisory Services

Account Portfolio Management
Investment Advisory Fees are paid quarterly in advance pursuant to the terms of the Investment Advisory Agreement. Investment Advisory Fees are based on the market value of assets under management at the end of each quarter. Investment Advisory Fees are paid quarterly in advance pursuant to the terms of the Investment Advisory Agreement. Investment Advisory Fees are based on the market value of all assets under management at the end of each quarter. Investment Advisory Fees range from 1.50%-2.00% based on the following schedule. Lower fees for comparable services may be available from other sources.

Assets Under Management	Annual Rate
$10,000 to $500,000	2.00%
$500,001 to $1,000,000	1.75%
Over $1,000,000	1.50%

Investment Advisory Fees in the first quarter of service are prorated to the inception date of the account to the end of the first quarter. Fees may be negotiable at the discretion of the Advisor. The Client's fees will take into consideration the aggregate assets under management with Advisor. All securities held in accounts managed by T&T will be independently valued by the designated Custodian. T&T will not have the authority or responsibility to value portfolio securities.

In certain circumstances, advisory fees and account minimums may be negotiable based upon prior relationships as well as related account holdings. The fees charged are calculated as described above and are not charged on the basis of a share of capital gains or capital appreciation of the funds or any portion of the funds of an advisory client. In accordance with CCR Section 260,238(j), it should be noted that lower fees for comparable services may be available from other sources.

The Client may be able to attain similar services for a lower fee from other service providers.

Performance-Based Fees
We may charge performance based fees for certain persons meeting the definition of a "qualified client" (generally, those clients who have at least $1,000,000 under our management at inception or that have certified to our firm that they have a net worth of at least $2,000,000 at the inception of our engagement for advisory services; or as otherwise permitted under applicable law). The fixed portion of the fee will not exceed 2.80% per annum of current portfolio equity, payable quarterly in advance. The performance fee is generally equal to a maximum of 20% of any gains in the Client account during the quarter to the extent that there are cumulative gains in the Client's account during the quarter. These fees are negotiable.

Although we comply with applicable rules and regulations, we believe our advisory fees are competitive. However, total fees, exceeding 3% of assets under management could be considered excessive. Comparable services may be available from other sources for a lower fee.

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Financial Planning Services
T&T Capital Management offers financial planning services on hourly rate ranging between $100 and $500 depending on the services to be performed and the complexity of the client's financial circumstances and/or objectives. The hour rate and services to be performed will be evidenced in a written agreement between T&T Capital Management and the Client. Hourly fees are due and payable upon completion of the engagement deliverables.

The financial planning services engagement may be terminated by the Client at any time by providing written notice to T&T Capital Management.

B. Fee Billing

Account Portfolio Management
Investment Advisory Fees will be automatically deducted from the Client Account by the Custodian. The Advisor shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client Account at the respective quarter end date. The amount due is calculated by applying the quarterly rate (annual rate divided by 4) to the total assets under management with T&T at the end of each quarter. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the Investment Advisory Fee. In addition, the Advisor will provide the Client a report itemizing the fee, including the calculation period covered by the fee, the account value and the methodology used to calculate the fee. It is the responsibility of the Client to verify the accuracy of these fees as listed on the custodian's brokerage statement as the Custodian does not assume this responsibility. Clients provide written authorization permitting T&T to be paid directly from their accounts held by the Custodian as part of the Investment Advisory Agreement and separate account forms provided by the Custodian.

Clients may also pay investment advisory fees by check, credit card or ACH. In these cases, T&T will not bill the custodian for the fee. T&T will invoice the Client directly. Fees are payable and due upon receipt of the invoice.

C. Other Fees and Expenses

Clients may incur certain fees or charges imposed by third parties, other than T&T, in connection with investments made on behalf of the Client's account[s]. The Client is responsible for all custodial and securities execution fees charged by the custodian and executing broker-dealer. The Investment Advisory Fee charged by T&T is separate and distinct from these custodian and execution fees.

In addition, all fees paid to T&T for investment advisory services are separate and distinct from the expenses charged by mutual funds and exchange-traded funds to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client could invest in these products directly, without the services of T&T, but would not receive the services provided by T&T which are designed, among other things, to assist the Client in determining which products or services are most appropriate to each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by T&T to fully understand the total fees to be paid. For information on our brokerage practices, please refer to *Item 12 - Brokerage Practices* of this firm brochure.

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D. Advance Payment of Fees and Termination

Account Portfolio Management
T&T is compensated for its services in advance of the quarter in which investment advisory services are rendered. Clients may request to terminate their Investment Advisory Agreement with T&T, in whole or in part, by providing advance written notice. The Client shall be responsible for Investment Advisory Fees up to and including the effective date of termination. Upon termination, the Advisor will refund any unearned, prepaid Investment Advisory Fees from the effective date of termination to the end of the quarter. The Client's Investment Advisory Agreement with the Advisor is non-transferable without Client's written approval.

E. Compensation for Sales of Securities or Other Investment Products

Persons providing investment advice on behalf of our firm are licensed as independent insurance agents. These persons will earn commission-based compensation for selling insurance products, including insurance products they sell to you. Insurance commissions earned by these persons are separate and in addition to our advisory fees. This practice presents a conflict of interest because persons providing investment advice on behalf of our firm who are insurance agents have an incentive to recommend insurance products to you for the purpose of generating commissions rather than solely based on your needs. You are under no obligation, contractually or otherwise, to purchase insurance products through any person affiliated with our firm.

Item 6 Performance-Based Fees and Side-By-Side Management

T&T may charge performance based fees for certain persons meeting the definition of a "qualified client"

"Qualified Client" means:

(i) A natural person who or a company that immediately after entering into the contract has at least $1,000,000 under the management of the investment adviser;
(ii) A natural person who or a company that the investment adviser entering into the contract (and any person acting on his behalf) reasonably believes, immediately prior to entering into the contract, either:
(A) Has a net worth (together, in the case of a natural person, with assets held jointly with a spouse) of more than $2,000,000, at the time the contract is entered into; or
(B) Is a qualified purchases as defined in section 2(a)(51)(AA) of the Investment Company Act of 1940 (15U.S.C. 80a-2(51)(A)) at the time the contract is entered into;
(iii) A natural person who immediately prior to entering into the contract is:
(A) An executive officer, director, trustee, general partner or person serving in similar capacity, of the investment adviser; or
(B) An employee of the investment adviser (other than an employee performing solely clerical, secretarially or administrative functions with regard to the investment 2 adviser) who, in connection with his or her regular functions or duties, participates in the investment activities of such investment adviser, provided that such employee has been performing such functions and duties for or on behalf of the investment adviser, or substantially similar functions or duties for or on behalf of another company for at least 12 months.

Performance-based fees are fees based on a share of capital gains or capital appreciation of a client's account. The amount of the performance based fee we charge is described in *Item 5 - Fees and Compensation* section - of this brochure. Performance-based fees create an incentive for our firm to make investments that are riskier or more speculative than would be the case absent a performance

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fee arrangement. In order to address this potential conflict of interest, a senior officer of our firm periodically reviews client accounts to ensure that investments are suitable and that the account is being managed according to the client's investment objectives and risk tolerance. Performance-based fees may also create an incentive for our firm to overvalue investments which lack a market quotation. In order to address such conflict, we have adopted policies and procedures that require our firm to "fairly value" any investments, which do not have a readily ascertainable value.

Side-by-side management might provide an incentive for our firm to favor accounts for which we receive a performance-based fee. For example, we may have an incentive to allocate limited investment opportunities, such as initial public offerings, to clients who are charged performance-based fees over clients who are charged asset based fees only. To address this conflict of interest, we have instituted policies and procedures that require our firm to allocate investment opportunities (if they are suitable) in an effort to avoid favoritism among our clients, regardless of whether the client is charged performance fees.

Item 7 Types of Clients

T&T provides investment advisory services to the following types of Clients:

- Individuals, Personal Trusts and Estates - private investors, investing their personal assets

The relative percentage each type of Client is available on T&T's Form ADV Part 1. These percentages will change over time. T&T generally does not impose a minimum account size for establishing a relationship.

Separate account management generally requires a minimum of $10,000 assets under management; however, under certain circumstances this may be negotiable.

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

A. Methods of Analysis

T&T primarily employs fundamental analysis methods in developing investment strategies for its Clients. Research and analysis from T&T is derived from numerous sources, including financial media companies, third-party research materials, Internet sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others.

T&T generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. T&T will typically hold all or a portion of a security for more than a year, but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, T&T may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector or asset class. We may use one or more of the following methods of analysis or investment strategies when providing investment advice to you:

Fundamental Analysis - involves analyzing individual companies and their industry groups, such as a company's financial statements, details regarding the company's product line, the experience and expertise of the company's management, and the outlook for the company and its industry. The resulting data is used to measure the true value of the company's stock compared to the current market value.

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Risk: The risk of fundamental analysis is that information obtained may be incorrect and the analysis may not provide an accurate estimate of earnings, which may be the basis for a stock's value. If securities prices adjust rapidly to new information, utilizing fundamental analysis may not result in favorable performance.

Technical Analysis - involves studying past price patterns, trends and interrelationships in the financial markets to assess risk-adjusted performance and predict the direction of both the overall market and specific securities.

Risk: The risk of market timing based on technical analysis is that our analysis may not accurately detect anomalies or predict future price movements. Current prices of securities may reflect all information known about the security and day-to-day changes in market prices of securities may follow random patterns and may not be predictable with any reliable degree of accuracy.

Charting Analysis - involves the gathering and processing of price and volume pattern information for a particular security, sector, broad index or commodity. This price and volume pattern information is analyzed. The resulting pattern and correlation data is used to detect departures from expected performance and diversification and predict future price movements and trends.

Risk: Our charting analysis may not accurately detect anomalies or predict future price movements. Current prices of securities may reflect all information known about the security and day-to-day changes in market prices of securities may follow random patterns and may not be predictable with any reliable degree of accuracy.

Cyclical Analysis - a type of technical analysis that involves evaluating recurring price patterns and trends. Economic/business cycles may not be predictable and may have many fluctuations between long-term expansions and contractions.

Risk: The lengths of economic cycles may be difficult to predict with accuracy and therefore the risk of cyclical analysis is the difficulty in predicting economic trends and consequently the changing value of securities that would be affected by these changing trends.

Long-Term Purchases - securities purchased with the expectation that the value of those securities will grow over a relatively long period of time, generally greater than one year.

Risk: Using a long-term purchase strategy generally assumes the financial markets will go up in the long-term which may not be the case. There is also the risk that the segment of the market that you are invested in or perhaps just your particular investment will go down over time even if the overall financial markets advance. Purchasing investments long-term may create an opportunity cost - "locking-up" assets that may be better utilized in the short-term in other investments.

Short-Term Purchases - securities purchased with the expectation that they will be sold within a relatively short period of time, generally less than one year, to take advantage of the securities' short-term price fluctuations.

Risk: Using a short-term purchase strategy generally assumes that we can predict how financial markets will perform in the short-term which may be very difficult and will incur a disproportionately higher amount of transaction costs compared to long-term trading. There are many factors that can affect financial market performance in the short-term (such as short-term interest rate changes, cyclical earnings announcements, etc.) but may have a smaller impact over longer periods of times.

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Trading - We may use frequent trading (in general, selling securities within 30 days of purchasing the same securities) as an investment strategy when managing your account(s). Frequent trading is not a fundamental part of our overall investment strategy, but we may use this strategy occasionally when we determine that it is suitable given your stated investment objectives and tolerance for risk. This may include buying and selling securities frequently in an effort to capture significant market gains and avoid significant losses.

Risk: When a frequent trading policy is in effect, there is a risk that investment performance within your account may be negatively affected, particularly through increased brokerage and other transactional costs and taxes.

B. Risk of Loss

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. T&T will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

Fundamental analysis utilizes economic and business indicators as investment selection criteria. These criteria are generally ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included in *Item 13 - Review of Accounts*.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process.

T&T may use margin in Client accounts to manage the timing of purchases and sales, as appropriate. T&T may employ options strategies to hedge or gain additional exposure to a particular asset class or sector. T&T's investment strategy encompasses active trading in concentrated portfolios. Following are some of the risks associated with Margin, Options and Short-Sale transactions:

Margin Transactions - a securities transaction in which an investor borrows money to purchase a security, in which case the security serves as collateral on the loan.

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Risk: If the value of the shares drops sufficiently, the investor will be required to either deposit more cash into the account or sell a portion of the stock in order to maintain the margin requirements of the account. This is known as a "margin call." An investor's overall risk includes the amount of money invested plus the amount that was loaned to them.

Option Writing - a securities transaction that involves selling an option. An option is a contract that gives the buyer the right, but not the obligation, to buy or sell a particular security at a specified price on or before the expiration date of the option. When an investor sells an option, he or she must deliver to the buyer a specified number of shares if the buyer exercises the option. The option writer/seller receives a premium (the market price of the option at a particular time) in exchange for writing the option.

Risk: Options are complex investments and can be very risky, especially if the investor does not own the underlying stock. In certain situations, an investor's risk can be unlimited.

Short Sales - Unlike a straightforward investment in stocks where you buy shares with the expectation that their price will increase so you can sell at a profit, in a "short sale" you borrow stocks from your brokerage firm and sell them immediately, hoping to buy them later at a lower price. Thus, a short seller hopes that the price of a stock will go down in the near future. A short seller thus uses declines in the market to his advantage. The short seller makes money when the stock prices fall and loses when prices go up. The SEC has strict regulations in place regarding short selling.

Risk: Short selling is very risky. A short seller will profit if the stock goes down in price, but if the price of the shares increase, the potential losses are unlimited. There is no ceiling on how much a short seller can lose in a trade. The share price may keep going up and the short seller will have to pay whatever the prevailing stock price is to buy back the shares. However, gains have a ceiling level because the stock price cannot fall below zero. A short seller has to undertake to pay the earnings on the borrowed securities as long as the short seller chooses to keep the short position open. If the company declares huge dividends or issues bonus shares, the short seller will have to pay that amount to the lender. Any such occurrence can skew the entire short investment and make it unprofitable. The broker can use the funds in the short seller's margin account to buy back the loaned shares or issue a "call away" to get the short seller to return the borrowed securities. If the broker makes this call when the stock price is much higher than the price at the time of the short sale, then the investor can end up taking huge losses.

Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with our firm. For more information on our investment management services, please contact us at 805-886-8140.

Item 9 Disciplinary Information

We are required to disclose the facts of any legal or disciplinary events that are material to a client's evaluation of our advisory business or the integrity of our management. We do not have any required disclosures under this item.

Item 10 Other Financial Industry Activities and Affiliations

Arrangements with Affiliated Entities
We have not provided information on other financial industry activities and affiliations because we do not have any relationship or arrangement that is material to our advisory business or to our clients with any of the types of entities listed below.

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1. broker-dealer, municipal securities dealer, or government securities dealer or broker.
2. investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund," and offshore fund).
3. other investment adviser or financial planner.
4. futures commission merchant, commodity pool operator, or commodity trading advisor.
5. banking or thrift institution.
6. accountant or accounting firm.
7. lawyer or law firm.
8. insurance company or agency.
9. pension consultant.
10. real estate broker or dealer.
11. sponsor or syndicator of limited partnerships.

Licensed Independent Insurance Agents
Our firm only provides investment advice. However, persons providing investment advice on behalf of our firm, in their separate capacity as an outside business activity, may be licensed as independent insurance agents. These persons will earn commission-based compensation for selling insurance products, including insurance products they sell to you. Insurance commissions earned by these persons are separate and in addition to our advisory fees. Please refer to *Item 5 - Fees and Compensation* in this firm brochure for more information on the compensation received by insurance agents who are affiliated with our firm and any resulting conflicts of interest presented by this arrangement. Associated persons of our firm who are licensed as independent insurance agents must ensure that their activities as an independent insurance agent at all times comply with the rules and regulations of the organizations and/or regulatory authorities issuing his insurance license and our Code of Ethics. Notwithstanding the foregoing, associated persons who are licensed as independent insurance agents shall refrain from recommending and/or selling insurance products to our advisory clients for which they may receive a sales commission.

Please refer to *Item 11 - Code of Ethics, Participation or Interest in Client Transactions, and Personal Trading* of this firm brochure for more information regarding our Code of Ethics.

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

A. Code of Ethics

T&T has implemented a Code of Ethics that defines our fiduciary commitment to each Client. This Code of Ethics applies to all persons associated with T&T. The Code of Ethics was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. T&T and its personnel owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of T&T associates to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code of Ethics covers a range of topics that may include; general ethical principles, reporting personal securities trading, reportable securities, initial public offerings and private placements, reporting ethical violations, distribution of the Code of Ethics, review and enforcement processes, amendments to Form ADV and supervisory procedures. T&T has written its Code of Ethics to meet and exceed regulatory standards. To request a copy of our Code of Ethics, please contact us at 805-886-8140.

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B. Personal Trading with Material Interest

Neither T&T nor any persons associated with T&T have any material financial interest in client transactions beyond the provision of investment advisory services as described in this brochure.

C & D. Personal Trading Practices

T&T allows our employees to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities we recommend (purchase or sell) to you presents a potential conflict of interest that, as fiduciaries, we must disclose to you and mitigate through policies and procedures. To mitigate this conflict of interest, it is T&T's policy that neither our firm nor persons associated with our firm shall have priority over your account in the purchase or sale of securities. As noted above, we have adopted, consistent with Section 204A of the Investment Advisers Act of 1940, a Code of Ethics, which addresses insider trading (material non-public information controls) and personal securities reporting procedures. We have also adopted written policies and procedures to detect the misuse of material, non-public information.

At no time, will T&T or any associated person of T&T, transact in any security to the detriment of any Client.

Item 12 Brokerage Practices

A. Recommendation of Custodian[s]

T&T does not have discretionary authority to select the broker-dealer/custodian for custodial and execution services or the administrator for defined contribution accounts. The Client will select the broker-dealer or custodian (herein the "custodian") to safeguard Client assets and authorize T&T to direct trades to this custodian as agreed in the Investment Advisory Agreement. Further, T&T does not have the discretionary authority to negotiate commissions on behalf of our Clients on a trade-by-trade basis.

Where T&T does not exercise discretion over the selection of the custodian, it may recommend the custodian[s] to Clients for execution and/or custodial services. Clients are not obligated to use the recommended custodian and will not incur any extra fee or cost associated with using a broker not recommended by T&T. T&T typically recommends to Clients that they established their brokerage account[s] at TD Ameritrade Institutional ("TD Ameritrade"). TD Ameritrade is an independent and unaffiliated SEC-registered broker-dealer and FINRA/SIPC member. TD Ameritrade offers independent investment advisors services, which include custody of securities, trade execution, clearance and settlement of transactions. T&T receives some benefits from TD Ameritrade through its participation in the program.

T&T considers a number of factors in selecting and/or recommending brokers and custodians for its Clients' accounts, including, but not limited to, execution capability, experience and financial stability, reputation and the quality of services provided. T&T is not affiliated with, or related to, TD Ameritrade. T&T receives economic benefits from TD Ameritrade, which are detailed in Item 14 below. T&T participates in the institutional advisor program (the "Program") offered by TD Ameritrade Institutional. TD Ameritrade Institutional is a division of TD Ameritrade Inc.

Following are additional details regarding the brokerage practices of the Advisor:

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1. Soft Dollars - Soft dollars are revenue programs offered by broker-dealers whereby an advisor enters into an agreement to place security trades with the broker in exchange for research and other services. As many of these services could be considered to provide a benefit to T&T, and because the "soft dollars" used to acquire these services are Client assets, T&T may have a conflict of interest in recommending a particular broker or dealer to execute Client transactions and the transaction compensation charged by that broker-dealer might not be the lowest compensation the Client might be able to obtain.

Generally, in addition to a broker's ability to provide "best execution," we may also consider the value of "research" or additional brokerage products and services a broker-dealer has provided or may be willing to provide. This is known as paying for those services or products with "soft dollars."

Recommended Custodians

T&T receives compensation and economic benefits from TD Ameritrade by participating in TD Ameritrade's Soft Dollar Program. This compensation may result in a conflict of interest between the Advisor and the Client as T&T could have an incentive to cause Clients to engage in more securities transactions than would otherwise be optimal in order to generate brokerage compensation with which to acquire products and services.

T&T's use of soft dollars is intended to comply with the requirements of Section 28(e) of the Securities Exchange Act of 1934. Section 28(e) provides a "safe harbor" for investment managers who use commissions or transaction fees paid by their advised accounts to obtain investment research services that provide lawful and appropriate assistance to the manager in performing investment decision-making responsibilities. As required by Section 28(e), T&T will make a good faith determination that the amount of commission or other fees paid is reasonable in relation to the value of the brokerage and research services provided. That is, before placing orders with a particular broker, we generally determine, considering all the factors described below, that the compensation to be paid to TD Ameritrade is reasonable in relation to the value of all the brokerage and research products and services provided by TD Ameritrade. In making this determination, we typically consider not only the particular transaction or transactions, and not only the value of brokerage and research services and products to a particular Client, but also the value of those services and products in our performance of our overall responsibilities to all of our Clients. In some cases, the commissions or other transaction fees charged by a particular broker-dealer for a particular transaction or set of transactions may be greater than the amounts another broker-dealer that did not provide research services or products might charge.

As noted above T&T receives a benefit because our firm does not pay for the research, products and/or services noted above. Consequently, T&T may have an incentive to recommend a broker-dealer/custodian based on our firm's interest rather than the interest of our clients. T&T has considered and evaluated the brokerage/custodial relationship with TD Ameritrade and the direct and indirect benefits to clients of T&T.

2. Brokerage Referrals - T&T does not receive any compensation from any third party in connection with the recommendation for establishing a brokerage account.

3. Directed Brokerage - All Clients are serviced on a "directed brokerage basis", where T&T will place trades within the established account[s] at the custodian designated by the Client. Further, all Client accounts are traded within their respective brokerage account[s]. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor's own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client's account[s]). In selecting the custodian, T&T will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction

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costs. These costs are determined by the designated custodian. As such, T&T may be unable to achieve the most favorable execution of client transactions and clients may pay higher brokerage commissions than the client might otherwise pay through another broker-dealer that offers the same types of services.

B. Aggregating and Allocating Trades

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the broker. T&T will execute its transactions through an unaffiliated broker-dealer selected by the Client. T&T may aggregate orders in a block trade or trades when securities are purchased or sold through the same broker-dealer for multiple (discretionary) accounts. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage particular Client accounts.

Where T&T does not block trade clients may pay different prices for the same securities transactions than other clients pay. Furthermore, T&T may not be able to buy and sell the same quantities of securities and clients may pay higher commissions, fees, and/or transaction costs than other clients.

Item 13 Review of Accounts

A. Frequency of Reviews

Accounts are monitored on a regular and continuous basis by T&T Capital Management. Formal reviews are generally conducted at least annually or more or less frequently depending on the needs of the Client. Tim Travis, Chief Investment Officer/President, will conduct all reviews.

B. Causes for Reviews

In addition to the investment monitoring noted above in *Item 13 - Review of Accounts*, each Client account shall be reviewed on an ongoing basis. Reviews may be conducted more or less frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account. The Client is encouraged to notify T&T if changes occur in financial situation that might adversely affect the investment plan. Additional reviews may be triggered by material market, economic or political events.

C. Review Reports

The Client will receive brokerage statements no less than quarterly from the trustee or custodian. These brokerage statements are sent directly from the custodian to the Client. The Client may also establish electronic access to the custodian's website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client's account[s]. The Advisor may also provide Clients with written periodic reports regarding their holdings, allocations, and performance.

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Item 14 Client Referrals and Other Compensation

A. Compensation Received by T&T

T&T is generally a "fee-only" advisory firm, insofar as in all circumstances, compensation from our clients is received solely through payment of advisory fees as described in this firm brochure. Notwithstanding that certain associated persons of our firm are licensed as independent insurance agents and may be eligible to collect sales commissions in connection with the sale of certain insurance products, such associated persons will refrain from recommending and/or selling insurance products to our advisory clients for which they may receive a sales commission. Accordingly, T&T does not receive commissions or other compensation from product sponsors, broker dealers, insurance companies or agencies or any other un-related third parties. T&T may refer Clients to various third parties to provide certain financial services necessary to meet the goals of its Clients. Likewise, T&T may receive referrals of new Clients from a third-party.

Participation in Institutional Advisor Platform

As disclosed above in *Item 12 - Brokerage Practices*, T&T participates in TD Ameritrade's institutional program and may recommend TD Ameritrade to Clients for custody and brokerage services. There is no direct link between T&T's participation in the program and the investment advice it gives to its Clients, although T&T receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors. T&T participates in the institutional advisor program (the "Program") offered by TD Ameritrade Institutional. TD Ameritrade Institutional is a division of TD Ameritrade Inc.

Generally, in addition to a broker's ability to provide "best execution," we may also consider the value of "research" or additional brokerage products and services a broker-dealer has provided or may be willing to provide. This is known as paying for those services or products with "soft dollars."

These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving adviser participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to T&T by third party vendors.

Some of the products and services made available by TD Ameritrade through the institutional program may benefit T&T but may not benefit its Client accounts. These products or services may assist T&T in managing and administering Client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help T&T manage and further develop its business. The benefits received by T&T or its personnel through participation in the institutional program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to its Clients, the T&T endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits by T&T or its advisory persons in and of itself creates a potential conflict of interest and may indirectly influence the T&T's recommendation of TD Ameritrade for custody and brokerage services.

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B. Client Referrals from Solicitors

T&T may directly compensate non-employee (outside) consultants, individuals, and/or entities (Solicitors) for client referrals. In order to receive a cash referral fee from our firm, Solicitors must comply with the requirements of the jurisdictions in which they operate. If you were referred to our firm by a Solicitor, you should have received a copy of this brochure along with the Solicitor's disclosure statement at the time of the referral. If you become a client, the Solicitor that referred you to our firm will receive compensation directly from our firm. You will not pay additional fees because of this referral arrangement. Referral fees paid to a Solicitor are contingent upon your entering into an advisory agreement with our firm. Therefore, a Solicitor has a financial incentive to recommend our firm to you for advisory services. This creates a conflict of interest; however, you are not obligated to retain our firm for advisory services. Comparable services and/or lower fees may be available through other firms.

Item 15 Custody

T&T does not accept or maintain custody of any Client accounts. All Clients must place their assets with a qualified custodian. Clients are required to select their own custodian to retain their funds and securities and direct T&T to utilize that custodian for the Client's security transactions. T&T encourages Clients to review statements provided by account custodian. For more information about custodians and brokerage practices please see *Item 12 - Brokerage Practices* of this firm brochure.

T&T encourages Clients to review statement(s) received from the acting qualified custodian. If the Client resides in a jurisdiction where T&T is required to deliver a fee statement (Bill Summary), T&T encourages Clients to compare such fee statement (Bill Summary) with the statements from the account custodian(s) to reconcile the information reflected on each statement. If Clients have a question regarding the account statement, or if Clients do not receive a statement from the account custodian, please contact T&T directly at the telephone number on the cover page of this brochure.

Item 16 Investment Discretion

T&T generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by T&T. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an Investment Advisory Agreement containing all applicable limitations to such authority. All discretionary trades made by T&T will be in accordance with each Client's investment objectives and goals.

Item 17 Voting Client Securities

T&T does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. At your request, we may offer you advice regarding corporate actions and the exercise of your proxy voting rights.

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Item 18 Financial Information

Neither T&T, nor its management has any adverse financial situations that would reasonably impair the ability of T&T to meet all obligations to its Clients. Neither T&T, nor any of its advisory persons, has been subject to a bankruptcy or financial compromise. T&T is not required to deliver a balance sheet along with this Brochure as the firm does not collect advance fees for services to be performed six months or more in advance.

Item 19 Requirements for State Registered Advisors

Please refer to the Part(s) 2B for background information about our principal executive officers, management personnel and those giving advice on behalf of our firm.

Our firm is not actively engaged in any business other than giving investment advice that is not already disclosed above.

Performance Fee Calculations

Performance-Based Fees

We may charge performance based fees for certain persons meeting the definition of a "qualified client" (generally, those clients who have at least $1,000,000 under our management at inception or that have certified to our firm that they have a net worth of at least $2,000,000 at the inception of our engagement for advisory services; or as otherwise permitted under applicable law). The fixed portion of the fee will not exceed 2.80% per annum of current portfolio equity, payable quarterly in advance. The performance fee is generally equal to a maximum of 20% of any gains in the Client account during the quarter to the extent that there are cumulative gains in the Client's account during the quarter.

Although we comply with applicable rules and regulations, we believe our advisory fees are competitive. However, total fees, exceeding 3% of assets under management could be considered excessive. Comparable services may be available from other sources for a lower fee.

Performance-based compensation may create an incentive for T&T to recommend an investment that may carry a higher degree of risk to the Client. Please see *Item 5 - Fees and Compensation* and *Item 6 Performance -Based Fees and Side-By-Side Management* for additional information.

Neither our firm, nor any of our management persons have any reportable arbitration claims, civil, self-regulatory organization proceedings, or administrative proceedings.

Neither our firm, nor any of our management persons have a material relationship or arrangement with any issuer of securities.

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Additional Information

Your Privacy
We view protecting your private information as a top priority. Pursuant to applicable privacy requirements, we have instituted policies and procedures to ensure that we keep your personal information private and secure.

We do not disclose any non-public personal information about you to any non-affiliated third parties, except as permitted by law. In the course of servicing your account, we may share some information with our service providers, such as transfer agents, custodians, broker-dealers, accountants, consultants, and attorneys.

We restrict internal access to non-public personal information about you to employees, who need that information in order to provide products or services to you. We maintain physical and procedural safeguards that comply with regulatory standards to guard your non-public personal information and to ensure our integrity and confidentiality. We will not sell information about you or your accounts to anyone. We do not share your information unless it is required to process a transaction, at your request, or required by law.

You will receive a copy of our privacy notice prior to or at the time you sign an advisory agreement with our firm. Thereafter, we will deliver a copy of the current privacy policy notice to you on an annual basis. Contact our main office at the telephone number on the cover page of this brochure if you have any questions regarding this policy.

If you decide to close your account(s) we will adhere to our privacy policies, which may be amended from time to time.

If we make any substantive changes in our privacy policy that would further permit or require disclosures of your private information, we will provide written notice to you. Where the change is based on permitted disclosures, you will be given an opportunity to direct us as to whether such disclosure is acceptable. Where the change is based on required disclosures, you will only receive written notice of the change. You may not opt out of the required disclosures.

If you have questions about our privacy policies contact our main office at the telephone number on the cover page of this firm brochure and ask to speak to the Chief Compliance Officer.

Trade Errors
In the event a trading error occurs in your account, our policy is to restore your account to the position it should have been in had the trading error not occurred. Depending on the circumstances, corrective actions may include canceling the trade, adjusting an allocation, and/or reimbursing the account.

Class Action Lawsuits
We do not determine if securities held by you are the subject of a class action lawsuit or whether you are eligible to participate in class action settlements or litigation nor do we initiate or participate in litigation to recover damages on your behalf for injuries as a result of actions, misconduct, or negligence by issuers of securities held by you.

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Timothy Travis

Tim Travis Capital Management, LLC
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September 25, 2017

FORM ADV PART 2B
BROCHURE SUPPLEMENT

This brochure supplement provides information about Timothy Travis that supplements the T&T Capital Management brochure. You should have received a copy of that brochure. Contact us at 805-886-8140 if you did not receive T&T Capital Management's brochure or if you have any questions about the contents of this supplement.

Additional information about Timothy Travis (CRD # 4698981) is available on the SEC's website at www.adviserinfo.sec.gov.

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Item 2 Educational Background and Business Experience

Timothy Travis
Year of Birth: 1982
Formal Education After High School:

- University of California, Santa Barbara, BA Economics

Business Background:

- Tim Travis Capital Management, LLC d/b/a T&T Capital Management, CEO and CCO, 8/2011 - Present
- TTCM LLC, CEO/CIO/Owner/Investment Adviser Representative, 1/2014 - 01/2016
- Diverse Financial Investment Advisory Group, Investment Adviser Representative, 1/2014 - 6/2014
- Opvest Wealth Management, Investment Adviser Representative, 4/2007 - 10/2011

Item 3 Disciplinary Information

Form ADV Part 2B requires disclosure of certain criminal or civil actions, administrative proceedings, and self-regulatory organization proceedings, as well as certain other proceedings related to suspension or revocation of a professional attainment, designation, or license. Mr. Timothy Travis has no required disclosures under this item.

Item 4 Other Business Activities

Timothy Travis is not actively engaged in any other business or occupation (investment-related or otherwise) beyond his capacity as CEO and CCO of T&T Capital Management. Moreover, Mr. Travis does not receive any commissions, bonuses or other compensation based on the sale of securities or other investment products.

Item 5 Additional Compensation

Timothy Travis does not receive any additional compensation beyond that received as an CEO and CCO of T&T Capital Management.

Item 6 Supervision

As the CEO and CCO of T&T Capital Management, Timothy Travis supervises the advisory activities of our firm. Timothy Travis can be reached at 805-886-8140.

Item 7 Requirements for State Registered Advisors

Timothy Travis does not have any reportable arbitration claims, has not been found liable in a reportable civil, self-regulatory organization or administrative proceeding, and has not been the subject of a bankruptcy petition.

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September 25, 2017

FORM ADV PART 2B
BROCHURE SUPPLEMENT

This brochure supplement provides information about Peter Travis that supplements the T&T Capital Management brochure. You should have received a copy of that brochure. Contact us at 805-886-8140 if you did not receive T&T Capital Management's brochure or if you have any questions about the contents of this supplement.

Additional information about Peter Travis (CRD # 5830345) is available on the SEC's website at www.adviserinfo.sec.gov.

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Item 2 Educational Background and Business Experience

Peter Travis
Year of Birth: 1977
Formal Education After High School:

- Peter Travis has no formal educational background

Business Background:

- Tim Travis Capital Management, LLC d/b/a T&T Capital Management, Chief Operating Officer, 9/2011 - Present
- TTCM LLC, Investment Adviser Representative, 2/2014 - 01/2016
- T&T Investment Management LLC, COO/IAR, 8/2010 - 10/2011
- Options Investments, Inc., Intern, 6/2010 - 6/2011
- Opvest Wealth Management, Investment Adviser Representative, 8/2010 - 10/2011

Item 3 Disciplinary Information

Form ADV Part 2B requires disclosure of certain criminal or civil actions, administrative proceedings, and self-regulatory organization proceedings, as well as certain other proceedings related to suspension or revocation of a professional attainment, designation, or license. Mr. Peter Travis has no required disclosures under this item.

Item 4 Other Business Activities

Peter Travis is not actively engaged in any other business or occupation (investment-related or otherwise) beyond his capacity as Chief Operating Officer of T&T Capital Management. Moreover, Mr. Travis does not receive any commissions, bonuses or other compensation based on the sale of securities or other investment products.

Item 5 Additional Compensation

Peter Travis does not receive any additional compensation beyond that received as an Chief Operating Officer of T&T Capital Management.

Item 6 Supervision

In the supervision of our associated persons, advice provided is limited based on the restrictions set by T&T Capital Management, and by internal decisions as to the types of investments that may be included in client portfolios. We conduct periodic reviews of client holdings and documented suitability information to provide reasonable assurance that the advice provided remains aligned with each client's stated investment objectives and with our internal guidelines.

My supervisor is: Timothy Travis, CEO and CCO

Supervisor phone number: 805-886-8140

Item 7 Requirements for State Registered Advisers

Peter Travis does not have any reportable arbitration claims, has not been found liable in a reportable civil, self-regulatory organization or administrative proceeding, and has not been the subject of a bankruptcy petition.

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FORM ADV PART 2B
BROCHURE SUPPLEMENT

This brochure supplement provides information about Joel Kelner that supplements the T&T Capital Management brochure. You should have received a copy of that brochure. Contact us at 805-886-8140 if you did not receive T&T Capital Management's brochure or if you have any questions about the contents of this supplement.

Additional information about Joel Kelner (CRD # 5865866) is available on the SEC's website at www.adviserinfo.sec.gov.

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Item 2 Educational Background and Business Experience

Joel Kelner
Year of Birth: 1981
Formal Education After High School:

- University of Florida, BA Business Administration, Finance, 2002

Business Background:

- Tim Travis Capital Management, LLC d/b/a T&T Capital Management, Investment Adviser Representative, 11/2013 - Present
- TTCM LLC, Partner/Investment Adviser Representative, 1/2014 - 01/2016
- Vatreni Inc, Loan Officer, 5/2011 - Present
- Options Investments, Inc., Option Specialist, 8/2008 - 5/2011

Item 3 Disciplinary Information

Form ADV Part 2B requires disclosure of certain criminal or civil actions, administrative proceedings, and self-regulatory organization proceedings, as well as certain other proceedings related to suspension or revocation of a professional attainment, designation, or license. Mr. Joel Kelner has no required disclosures under this item.

Item 4 Other Business Activities

Joel Kelner is Principal of Vatreni, Inc., a real estate and mortgage company. Mr. Kelner's duties as the Principal of Vatreni, Inc. do not create a conflict of interest to his provision of advisory services through T&T Capital Management.

Item 5 Additional Compensation

Refer to the *Other Business Activities* section above for disclosures on Mr. Kelner's receipt of additional compensation as a result of his other business activities.

Also, refer to the *Other Financial Industry Activities and Affiliations* section of T&T Capital Management's firm brochure for additional disclosures on this topic.

Item 6 Supervision

In the supervision of our associated persons, advice provided is limited based on the restrictions set by T&T Capital Management, and by internal decisions as to the types of investments that may be included in client portfolios. We conduct periodic reviews of client holdings and documented suitability information to provide reasonable assurance that the advice provided remains aligned with each client's stated investment objectives and with our internal guidelines.

My supervisor is: Timothy Travis, CEO and CCO

Supervisor phone number: 805-886-8140

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Item 7 Requirements for State Registered Advisers

Joel Kelner does not have any reportable arbitration claims, has not been found liable in a reportable civil, self-regulatory organization or administrative proceeding, and has not been the subject of a bankruptcy petition.

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September 25, 2017

FORM ADV PART 2B
BROCHURE SUPPLEMENT

This brochure supplement provides information about Mario Fragomeno that supplements the T&T Capital Management brochure. You should have received a copy of that brochure. Contact us at 805-886-8140 if you did not receive T&T Capital Management's brochure or if you have any questions about the contents of this supplement.

Additional information about Mario Fragomeno (CRD # 6021105) is available on the SEC's website at www.adviserinfo.sec.gov.

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Item 2 Educational Background and Business Experience

Mario Fragomeno
Year of Birth: 1983
Formal Education After High School:

- University of California, Irvine, BS Civil Engineering, 2006

Business Background:

- Tim Travis Capital Management, LLC d/b/a T&T Capital Management, Director of Client Relations, 8/2013 - Present
- TTCM LLC, Investment Adviser Representative, 2/2014 - 01/2016
- National Securities Corp, Registered Representative, 4/2013 - 8/2013
- Independent Capital Management, Inc, Management Trainee, 1/2012 - 1/2013
- Sagepoint Financial, Inc., Registered Representative, 2/2012 - 1/2013
- Kimley-Horn & Associates, Inc., Civil Engineering Consultant, 6/2006 - 12/2011
- National Asset Management, Inc., Investment Adviser Representative, 5/2013 - 8/2013

Item 3 Disciplinary Information

Form ADV Part 2B requires disclosure of certain criminal or civil actions, administrative proceedings, and self-regulatory organization proceedings, as well as certain other proceedings related to suspension or revocation of a professional attainment, designation, or license. Mr. Mario Fragomeno has no required disclosures under this item.

Item 4 Other Business Activities

Mario Fragomeno is separately licensed as an independent insurance agent. In this capacity, he can effect transactions in insurance products for his clients and earn commissions for these activities. The fees you pay our firm for advisory services are separate and distinct from the commissions earned by Mr. Fragomeno for insurance related activities. This presents a conflict of interest because Mr. Fragomeno may have an incentive to recommend insurance products to you for the purpose of generating commissions rather than solely based on your needs. However, you are under no obligation, contractually or otherwise, to purchase insurance products through any person affiliated with our firm.

Item 5 Additional Compensation

Refer to the *Other Business Activities* section above for disclosures on Mr. Fragomeno's receipt of additional compensation as a result of his other business activities.

Also, refer to the *Other Financial Industry Activities and Affiliations* section of T&T Capital Management's firm brochure for additional disclosures on this topic.

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Item 6 Supervision

In the supervision of our associated persons, advice provided is limited based on the restrictions set by T&T Capital Management, and by internal decisions as to the types of investments that may be included in client portfolios. We conduct periodic reviews of client holdings and documented suitability information to provide reasonable assurance that the advice provided remains aligned with each client's stated investment objectives and with our internal guidelines.

My supervisor is: Timothy Travis, CEO and CCO

Supervisor phone number: 805-886-8140

Item 7 Requirements for State Registered Advisers

Mario Fragomeno does not have any reportable arbitration claims, has not been found liable in a reportable civil, self-regulatory organization or administrative proceeding, and has not been the subject of a bankruptcy petition.

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FORM ADV PART 2B
BROCHURE SUPPLEMENT

This brochure supplement provides information about Mitchell Fee that supplements the T&T Capital Management brochure. You should have received a copy of that brochure. Contact us at 805-886-8140 if you did not receive T&T Capital Management's brochure or if you have any questions about the contents of this supplement.

Additional information about Mitchell Fee (CRD # 5950554) is available on the SEC's website at www.adviserinfo.sec.gov.

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Item 2 Educational Background and Business Experience

Mitchell Fee
Year of Birth: 1979
Formal Education After High School:

- Riverside Community College, Business , 9/1998 - 9/2000

Business Background:

- Tim Travis Capital Management, LLC d/b/a T&T Capital Management, Investment Adviser Representative, 3/2017 - Present
- Three Lakes Advisors, Branch Manager/Associated Person, 4/2017 - Present
- Kingsview LLC, Associated Person, 11/2014 - 05/2017
- Kingsview Asset Management, Investment Adviser Representative, 6/2015 - 3/2017
- Investcore Partners, Sr. Account Executive, 7/2012 - 11/2014
- Unemployed, 3/2012 - 7/2012
- Vision Investment Advisors, Registered Representative, 6/2011 - 6/2012
- Option Investments, Broker, 6/2004 - 3/2012

Item 3 Disciplinary Information

The National Futures Association took certain disciplinary actions against Mitchell Fee for alleged violations of certain securities regulations, rules, and/or statutory provisions. The matters have been resolved. Mitchell Fee has no outstanding issues and is registered without restriction as an investment adviser representative on behalf of T&T Capital Management. The details on these matters related to Mitchell Fee's disciplinary history can be found on the IAPD. The IAPD link is www.adviserinfo.sec.gov. and searching Mr. Fee's individual CRD number (5950554).

Item 4 Other Business Activities

Mitchell Fee is separately licensed as an independent insurance agent. In this capacity, he can effect transactions in insurance products for his clients and earn commissions for these activities. The fees you pay our firm for advisory services are separate and distinct from the commissions earned by Mr. Fee for insurance related activities. This presents a conflict of interest because Mr. Fee may have an incentive to recommend insurance products to you for the purpose of generating commissions rather than solely based on your needs. However, you are under no obligation, contractually or otherwise, to purchase insurance products through any person affiliated with our firm.

Mitchell Fee is the Branch Manager and Associated Person of Three Lakes Advisors, an Introducing Broker. Mr. Fee's duties as the Branch Manager and Associated Person of Three Lakes Advisors do not create a conflict of interest to his provision of advisory services through T&T Capital Management.

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Item 5 Additional Compensation

Refer to the *Other Business Activities* section above for disclosures on Mr. Fee's receipt of additional compensation as a result of his other business activities.

Also, refer to the *Fees and Compensation*, *Client Referrals and Other Compensation, and Other Financial Industry Activities and Affiliations* section(s) of T&T Capital Management's firm brochure for additional disclosures on this topic.

Item 6 Supervision

In the supervision of our associated persons, advice provided is limited based on the restrictions set by T&T Capital Management, and by internal decisions as to the types of investments that may be included in client portfolios. We conduct periodic reviews of client holdings and documented suitability information to provide reasonable assurance that the advice provided remains aligned with each client's stated investment objectives and with our internal guidelines.

My supervisor is: Timothy Travis, CEO and CCO

Supervisor phone number: 805-886-8140

Item 7 Requirements for State Registered Advisers

Mitchell Fee does not have any reportable arbitration claims, and has not been the subject of a bankruptcy petition. Please see Item 3 above for certain disciplinary infromation.

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