

**Client Relationship Summary**  
**Chronim Investments, Inc. dba Snider Advisors and Chrisilis (CRD# 120943)**

## Introduction

Our firm, Chronim Investments, Inc. dba Snider Advisors and Chrisilis, is registered as an investment adviser with the U.S. Securities and Exchange Commission. Brokerage and investment advisory services and fees differ and it is important for you to understand these differences. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](http://Investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing.

## Relationships and Services

### What investment services and advice can you provide me?

**Services:** We offer investment advisory services to retail investors. These services include asset management and various levels of consulting, including educational workshops, general investment consulting, securities rating and performance reporting. We work closely with you to identify your investment goals and objectives, as well as risk tolerance and financial situation in order to develop an investment approach.

**Accounts, Investments, and Monitoring:** We provide services to individual, joint, retirement, trust and estate accounts. We primarily use exchange-traded funds, stocks, and options in constructing portfolios. We do not make available or offer advice with respect to only proprietary products or a limited menu of products or types of investments. As part of our services, we monitor portfolios and securities in accounts on a regular and continuous basis. We also offer to meet with you at least annually, or more frequently, depending on your needs.

**Investment Authority:** We provide our services either on a discretionary or non-discretionary basis. Discretionary engagements mean we will execute investment recommendations in accordance with your investment objectives without your prior approval of each specific transaction. Our engagement will continue until you notify us otherwise in writing. Non-discretionary engagements mean we are required to obtain your consent prior to executing any trades in your accounts. Therefore, you will make the ultimate decision regarding the purchase or sale of investments in your accounts.

**Account Minimums & Other Requirements:** For discretionary asset management services we require a minimum account size of \$200,000 in order to effectively implement our investment process. This amount may be waived or reduced at our sole discretion. For non-discretionary clients, we recommend a minimum investment of \$25,000.

**Additional Information:** For more detailed information on our relationships and services, please see Item 4 – Advisory Services, Item 13 – Review of Accounts and Item 7 – Types of Clients of our Form ADV Part 2A available via our firm's [Investment Adviser Public Disclosure Page](#).

**Conversation Starters:** *Given my financial situation, should I choose an investment advisory service? Why or why not? How will you choose investments to recommend to me? What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?*

## Fees, Costs, Conflicts, and Standard of Conduct

### What fees will I pay?

**Asset-Based Fees:** Our asset-based fees for asset management services range from 0.50% to 2.50% annually based on the value of your portfolio and the scope of services provided. Asset-based fees are collected either monthly or quarterly and calculated as a percentage of the value of the cash and investments in your account[s] that we manage. This presents a conflict of interest as we are financially incentivized to encourage you to place more assets in your advisory account as you will ultimately pay more in advisory fees.

**Fixed Fees:** Our fixed fees for consulting vary based on the scope of services provided. Initial educational workshop fees are equal to \$799 and are due in a single installment. Ongoing consulting fees are collected on a monthly basis and range up to \$250 in any given month. Fixed fees are negotiable based on the nature and complexity of the services to be provided and the overall relationship with us.

**Other Fees & Costs:** In addition to our advisory fee, you will also be responsible for trading commissions, custody fees, account administrative fees, fees and expenses related to exchange-traded funds and applicable securities transaction fees.

**Additional Information: You will pay fees and costs whether you make or lose money on your investments.** Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying. For more detailed information on our fees, please see Item 5 –

Fees and Compensation of our Form ADV Part 2A available via our firm's [Investment Adviser Public Disclosure Page](#).

**Conversation Starters:** *Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?*

#### What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?

When we act as your investment adviser, we have to act in your best interest and not put our interests ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice that we provide you. Here is an example to help you understand what this means.

Our firm is dually licensed as an insurance agency where certain of our financial professionals are licensed as insurance agents. When it's deemed to be in your best interest, our firm will recommend that you purchase insurance products through us. The fees charged for the implementation of insurance products are separate from our advisory fees, where our firm will earn commission-based compensation. Therefore, we have a financial incentive to recommend that you implement insurance through our firm.

**Additional Information:** For more detailed information, please see Item 10 – Financial Industry Activities and Affiliations, Item 12 – Brokerage Practices and Item 14 – Client Referrals and Other Compensation of our Form ADV Part 2A available via our firm's [Investment Adviser Public Disclosure Page](#).

**Conversation Starters:** *How might your conflicts of interest affect me, and how will you address them?*

#### How do your financial professionals make money?

Our financial professionals are compensated based on an agreed-upon annual salary. Certain financial professionals may also be entitled to an incentive bonus tied to bringing on new clients or providing new advisory services. This means our financial professionals have an incentive to solicit new business or advisory services, taking time away from the day-to-day servicing of existing clients.

### Disciplinary History

#### Do you or your financial professionals have legal or disciplinary history?

No. You can visit [Investor.gov/CRS](http://Investor.gov/CRS) for a free and simple search tool to research our firm and our financial professionals.

**Conversation Starters:** *As a financial professional, do you have any disciplinary history? For what type of conduct?*

### Additional Information

You can find additional information about our investment advisory services by viewing our Form ADV Part 2A available via our firm's [Investment Adviser Public Disclosure Page](#) or by visiting our website at <http://www.snideradvisors.com>. You can request up to date information and a copy of our client relationship summary by contacting us at [janderson@snideradvisors.com](mailto:janderson@snideradvisors.com) or (214) 220-0055.

**Conversation Starters:** *Who is my primary contact person? Is he or she a representative of an investment advisor? Who can I talk to if I have concerns about how this person is treating me?*

# CHRONIM INVESTMENTS, INC.

PART 2A AND 2B OF FORM ADV: Firm Brochure and Brochure Supplements

## CHRONIM INVESTMENTS, INC.

DBA SNIDER ADVISORS

AND

DBA CHRISILIS

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Suite 120  
Irving, TX 75062

SNIDER ADVISORS

888-676-4337

[support@snideradvisors.com](mailto:support@snideradvisors.com)

[www.snideradvisors.com](http://www.snideradvisors.com)

CHRISILIS

877-449-0147

[support@chrisilis.com](mailto:support@chrisilis.com)

[www.chrisilis.com](http://www.chrisilis.com)

March 3, 2021

This brochure provides information about the qualifications and business practices of Chronim Investments, Inc. If you have any questions about the contents of this brochure, please contact us at 214-220-0055 or [support@snideradvisors.com](mailto:support@snideradvisors.com) or [support@chrisilis.com](mailto:support@chrisilis.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission.

Additional information about Chronim Investments is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search this site by a unique identifying number, known as a CRD number. Our firm's CRD number is 120943. Registration does not imply a certain level of skill or training.



## ITEM 2 MATERIAL CHANGES

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### Material Changes

The following material changes have been made to this Disclosure Brochure since the last filing and distribution to clients:

- Effective January 2021, the Advisor became affiliated with optionDash and TrackYourDividends both of which are online investment tools that are made available to clients. Please see Item 10 for additional Information.

### Full Brochure Available

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us via email at [support@snideradvisors.com](mailto:support@snideradvisors.com) or [support@chrisilis.com](mailto:support@chrisilis.com). You can also visit our websites at [www.snideradvisors.com](http://www.snideradvisors.com) or [www.chrisilis.com](http://www.chrisilis.com).

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## ITEM 4 ADVISORY BUSINESS

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### Firm Description

Chronim Investments, Inc. (Chronim) is an SEC registered investment adviser with its principal place of business located in Texas. Chronim Investments, Inc. began conducting business in 2002. Chronim offers educational and investment management products tailored to meet our clients' needs. We conduct all investment business under the names Snider Advisors and Chrisilis.

Snider Advisors investment management and consulting services are built to assist our clients in implementing the Snider Investment Method. The Snider Method is a systematic strategy with specifically defined steps to invest for cash flow. It uses a combination of stock, options, and cash, along with specific techniques applied in a specific sequence to achieve our cash flow objectives. The Snider Method uses our proprietary stock selection tool "Lattco" to select stocks that fit within the parameters of the Snider Investment Method. In addition to Lattco, we also offer two additional tiers of the software to assist clients with their implementation of the Snider Investment Method. Lattco PRO assists clients with the bookkeeping necessary to implement the strategy. Lattco AutoPilot walks clients through every trade in their investment account, recommends their trades according to the Snider Investment Method, sends their trades directly to the broker, and updates all their records. In order to properly implement the Snider Method, clients must complete our Snider Investment Method course. It is not necessary to attend our seminar if you are seeking Asset Management services. Consulting services and Lattco are optional after successfully completing the Snider Investment Method course.

Chrisilis is an online investment advisor that recommends, implements, and provides on-going investment management of low-cost, Exchange Traded Fund (ETF) portfolios on a discretionary basis.

Should a client have certain restrictions on specific stock transactions, we can assist them in implementing the strategy with those restrictions accounted for. Ultimately, the clients' suitability for the Snider Investment Method is required to be determined prior to the client attending our educational seminar.

Chronim does not participate in any wrap fee programs.

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### Principal Owners

Listed below are the firm's principal shareholders. These are the individuals and/or entities controlling 25% or more of this company.

- Jesse G. Anderson
- Tyler Curtis

## Types of Advisory Services

For all advisory services we gather data regarding a client's circumstances to determine a suitable investment. We gather information on the client's individual objectives, time horizons, risk tolerance, and liquidity needs. As appropriate, we also review and discuss a client's prior investment history, as well as family composition and background.

Our investment recommendations are not limited to any specific product or service offered by a broker-dealer or insurance company. They include:

- Exchange-listed securities
- Options contracts on securities
- United States governmental securities
- Exchange Traded Funds (ETFs)

Because some types of investments involve certain additional degrees of risk, they will only be implemented/recommended when consistent with the client's stated investment objectives, tolerance for risk, liquidity, and suitability.

Snider Advisors is not a broker or custodian. All clients must open a brokerage account under their own name. Depending on the level of service selected, clients will be given general Snider Investment Method investment guidance, specific non-discretionary investment recommendations, or full discretionary implementation of our investment strategy.

### SNIDER ADVISORS: SNIDER INVESTMENT METHOD WORKSHOP

A client generally begins their relationship with Snider Advisors through our Snider Investment Method Workshop. We conduct group educational workshops where clients learn the Snider Investment Method. The Snider Method is a long-term strategy designed to create income from your portfolio. It uses a combination of stock, options and cash, along with specific techniques applied in a specific sequence, to achieve these goals.

We offer the Snider Investment Method Workshop in two forms, live and online. The live version of the course is taught in a one-day workshop covering all the material you need to learn the Method. Our online course is a 6 hour on-demand version that investors can take at their own pace. Each course covers the exact same material.

After the completion of the workshop, clients can choose to engage in additional service to assist them in the implementation of the Snider Investment Method. The Snider Investment Method workshop is a prerequisite for all additional service except Snider Advisors Asset Management and Chrisilis Investment Management.

No additional services are required after the completion of the workshop in order to implement the Snider Investment Method. However, each additional service is designed to make implementation easier, more accurate, and less time consuming. Higher levels of service come at an additional cost and in turn receive more specialized services and investment guidance.

### SNIDER ADVISORS: LEVEL 1 CONSULTING

Snider Advisors provides advice to a client regarding the investment of their funds based on the Snider Investment Method. Level 1 Consulting consists of a monthly newsletter, periodic notices of events which may affect the trades called for by the method, answering questions from clients regarding the method in general or specific to their accounts, and assistance placing trades.

Level 1 Consulting clients do all their own trading and make their own investment decisions, although we recommend they strictly follow the rules of the Snider Investment Method. They can use any brokerage service and do not require any additional service to implement the Method. A Level 1 Consulting client may request Snider Advisors place the trades on their behalf (Vacation Trade). In this case, we assume discretionary authority over the account for a limited period of time when a client makes such a request. Discretionary authority requires a Limited Trading Authorization agreement on file for each client account. This service can be used up to 2 times per year and meant to be used when a client is unable to place their own trades on the designated Trade Day.

#### SNIDER ADVISORS: LATTCO (SECURITIES RATING SERVICES)

Snider Advisors provides a securities rating service called Lattco. This service is used to find new securities appropriate for the Snider Investment Method. We exclude securities from consideration based on fundamental data, credit scoring methods, and liquidity measures (for the stock and the options on the stock).

Included securities are then ranked based on price, volatility, liquidity, sector, and industry factors and presented to the client as investment recommendations. Clients can implement Lattco's investment recommendations at any broker of their choosing. Recommendations are specific to the parameters of the clients' account to include the new ticker, quantity, and corresponding put and call options according to the first month rules of the Snider Investment Method.

Subsequent investment recommendations regarding a security are determined by the algorithms and rules of the Snider Investment Method, which do not generally consider these factors after the initial Lattco recommendation.

Lattco users are required to be Level 1 Consulting clients to utilize the service. A client could choose their own stock selection criteria and implement the Snider Investment Method on securities they choose on their own. Lattco is not required to implement the Method.

#### SNIDER ADVISORS: LATTCO PRO

Lattco PRO is a recordkeeping system for the Snider Investment Method. Part of the Snider Method includes keeping detailed records of each transaction to aid in the decision-making process of buying more stock and selling the appropriate calls and puts. Prior to Lattco PRO, clients recorded this information in specially designed worksheets by hand or created their own spreadsheet to organize the information.

With Lattco PRO, an electronic connection between the client's brokerage account and Lattco is created so that Lattco can download the brokerage activity directly. It organizes a client's account and trading data to aid clients in the accurate implementation of our strategy. In addition to organizing trading activity, it accurately tracks monthly performance and stores historical position data. Due to technical limitations of Lattco PRO and various brokers, it is only available to clients using Ally Invest or Fidelity as their broker.

Lattco PRO users are required to be Level 1 Consulting clients to utilize the service. A client can choose to do all the recordkeeping on their own. Lattco PRO is not required to implement the Method. Users of Lattco PRO are not charged for their use of Lattco's security rating service.

#### SNIDER ADVISORS: LATTCO AUTOPILOT (NON-DISCRETIONARY MANAGEMENT)



Lattco AutoPilot guides clients through each step of implementing the Snider Investment Method. It suggests each trade, pre-fills trade order forms, sends the order to the broker after client approval, and downloads trade activity. Data is organized according to the Snider Method along with detailed performance figures and charts. All trade recommendations are according to the Snider Investment Method and the client's specific account.

Due to technical limitations of Lattco AutoPilot and various brokers, it is only available to clients using Ally Invest. Clients using Lattco AutoPilot do not need Level 1 Consulting or any of the other Lattco services. These other services are included with Lattco AutoPilot. Assets utilizing Lattco AutoPilot are managed on a non-discretionary basis with clients making the final decision to place each trade recommendation.

#### SNIDER ADVISORS: ASSET MANAGEMENT

Our firm provides continuous regular asset management of client funds based on the Snider Method. All our Snider Advisors Asset Management clients' accounts utilize the Snider Investment Method, a long-term strategy designed to create income from your portfolio. It uses a combination of stock, options and cash, along with specific techniques applied in a specific sequence, to achieve these goals.

All accounts are managed on a discretionary basis. All trading is done by Snider Advisors. Each month we evaluate our clients' accounts and place the appropriate stock and option trades. Our implementation of the Snider Investment Method is substantially similar to the strategy we teach in our Snider Investment Method course. We do not require Asset Management clients to complete the workshop, although we encourage it so that they are well educated on the strategy and the activity in their account.

Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors. Once the client's portfolio has been established, we perform the trades specified by the method each month. In addition to quarterly custodial statements, we send the client a detailed monthly performance report with an income breakdown and provide an annual report.

Due to technical limitations, Snider Advisors asset management clients must open accounts at Interactive Brokers. Snider Advisors does not participate in any wrap fee programs.

#### CHRISILIS: ASSET MANAGEMENT

Chrisilis provides continuous regular asset management of client funds based on modern portfolio theory. We implement diversified portfolios with ETF investments tracking stocks, bonds, emerging markets, real estate, and commodity indexes. We gather data regarding a client's circumstances to determine if the portfolio is a suitable investment. We gather information on the client's individual objectives, time horizons, risk tolerance, and liquidity needs. As appropriate, we also review and discuss a client's prior investment history, as well as family composition and background.

We manage these advisory accounts on a discretionary basis. The portfolio recommendations consider factors such as liquidity needs, income objectives, risk tolerances, and tax considerations.

Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors. Once the client's portfolio has been established, we perform trades to reinvest fund distributions and rebalance fund allocations back to targets when portfolios become out of line.

Our investment recommendations are not limited to any specific product or service offered by a broker-dealer or insurance company and will generally include advice regarding the following securities:

- Exchange Traded Funds (ETFs)

Because some types of investments involve certain additional degrees of risk, they will only be

implemented/recommended when consistent with the client's stated investment objectives, tolerance for risk, liquidity and suitability.

Chrisilis does not participate in any wrap fee programs.

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#### Amount of Managed Assets

As of 12/31/2020, Chronim Investments was actively managing \$149,386,471 of clients' assets for 443 accounts, \$58,843,289 of which were managed on a discretionary basis and \$90,543,182 on a non-discretionary basis. Clients may request more current information at any time by contacting the Advisor.

## ITEM 5 FEES AND COMPENSATION

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### SNIDER INVESTMENT METHOD WORKSHOP

The Snider Investment Method Online Course is \$799. Any discounts and/or promotional offers on any of our services are offered at our discretion. We may also reduce or waive fees for workshop attendance for family and friends of our employees or certain vendors and associates of Snider Advisors. For 30 days after initial enrollment in the course, clients have full access to all consulting and Lattco services at no additional charge.

Your payment is due the day you sign up for the online course. A client may request a full refund for any payment within 30 days of the charge. After 30 days, clients can decide the appropriate level of service for their future needs or cancel all services. Snider Advisors reserves the right to negotiate individual fee agreements and/or run fee discounts or limited time specials on pricing.

### SNIDER ADVISORS LEVEL 1 CONSULTING

The monthly fee for Snider Method Level 1 Consulting services is \$10 charged at the beginning of the month in advance. No additional consulting fees are charged to Asset Management clients. Clients can either have the fee deducted from their accounts by the broker or charged to a credit card. Clients receive an itemized invoice at the same time any fee is deducted from their account or charged to their credit card.

There is no minimum asset value for Snider Method Consulting Services since clients are trading their own accounts. However, we recommend a minimum investment of \$25,000. There is no charge for partial-month usage. Snider Advisors reserves the right to negotiate individual fee agreements.

### SNIDER ADVISORS LATTCO (SECURITIES RATINGS SERVICES FEES)

The fee for Lattco is \$30 in any month in which the client uses the service, regardless of how many times the service is used during the month. All fees other than the \$10 fee are charged in arrears at the end of the month.

### SNIDER ADVISORS LATTCO PRO

The fee for Lattco PRO is \$8 per position per month when activity is downloaded and includes the cost of searching for new positions (There is **not** an additional \$30 Lattco charge). The maximum fee for Lattco PRO in any one month is \$250. Fees can be discounted or waived for clients using the products for the first time.

Clients can either have the fee deducted from their accounts by the broker or charged to a credit card. Clients receive an itemized invoice at the same time any fee is deducted from their account or charged to their credit

card. There is no charge for partial-month usage. Snider Advisors reserves the right to negotiate individual fee agreements.

#### SNIDER ADVISORS LATTCO AUTOPILOT (NON-DISCRETIONARY MANAGEMENT)

The annualized fee for Lattco AutoPilot non-discretionary management services will be charged as a percentage of assets under management, according to the following schedule:

<u>Assets Under Management</u>	<u>Annual Fee</u>
Less than \$1,500,000	0.75%
Greater than \$1,500,000	0.50%

Lattco AutoPilot is billed monthly, in arrears. The fees are based upon the asset value as of the end of the month as it appears on the brokerage statement. The fee for each month for all the accounts owned by one individual or one trust is subject to a maximum, which is the fee for the smallest asset value for the next level. For example, accounts under \$1,500,000 will pay 1/12 of 0.75%, but not more than 1/12 of 0.50% of \$1,500,000. All the accounts owned by a client, spouse, and minor children are aggregated to determine the fee percentage. Fees are prorated by days in any period in which the services terminate. Upon termination, any unpaid fees are due.

There is no minimum asset value for Snider Method Consulting Services since clients are trading their own accounts. However, we recommend a minimum investment of \$25,000. Clients can either have the fee deducted from their accounts by the broker or charged to a credit card. Clients receive an itemized invoice at the same time any fee is deducted from their account or charged to their credit card. There is no charge for partial-month usage. Snider Advisors reserves the right to negotiate individual fee agreements.

Lattco AutoPilot clients are entitled to Level 1 Consulting, Lattco, and Lattco PRO at no additional charge.

#### SNIDER ADVISORS ASSET MANAGEMENT

The annualized fee for Asset Management Services will be charged as a percentage of assets under management, according to the following schedule:

<u>Assets Under Management</u>	<u>Annual Fee</u>
Less than \$500,000	2.50%
\$500,001 - \$2,000,000	2.00%
\$2,000,001 - \$5,000,000	1.50%
More than \$5,000,001	1.00%

Fees above 2% may be considered excessive and clients may be able to obtain the same or similar services for a lower amount.

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The minimum asset value for Asset Management Services is \$200,000. These fees are billed monthly, in arrears. The fees are based upon the asset value as of the end of the prior month as it appears on the brokerage statement. Clients can either have the fee deducted from their accounts by the broker or charged to a credit card. Clients receive an itemized invoice at the same time any fee is deducted from their account or charged to their credit card.

The fee for each month for all the accounts owned by one individual or one trust is subject to a maximum, which is the fee for the smallest asset value for the next level. For example, accounts under \$500,000 will pay 1/12 of

2.5%, but not more than 1/12 of 2.0% of \$500,000. All the accounts owned by a client, spouse, and minor children are aggregated to determine the fee percentage. Fees are prorated by days in any period in which the services terminate. Upon termination, any unpaid fees are due.

Snider Advisors offers a rebate against asset management fees for clients who purchase the Snider Investment Method™ course. If a client attends our Snider Investment Method workshop and then decides to use our Asset Management, we will rebate the client up to 100% of the workshop cost. The client's monthly fee is reduced by \$200 each month until the full amount of the rebate is issued. Snider Advisors reserves the right to negotiate individual fee agreements. Special consideration is given to client's extended family members in order to group assets to obtain a lower fee percentage.

Asset Management clients are entitled to Level 1 Consulting, Lattco, and Lattco PRO at no additional charge.

### CHRISILIS INVESTMENT MANAGEMENT

Chrisilis does not impose a minimum asset value for asset management services. The annualized fee for Chrisilis Investment Management Services will be charged .5% (50 basis points) of assets under management. Chrisilis fees are billed quarterly, in arrears. A fee for each month is calculated based upon the asset value at the end of each month as it appears on the brokerage statement. The total fee for the quarter is collected in arrears after its completion.

Clients can either have the fee deducted from their accounts by the broker or charged to a credit card. Clients receive an itemized invoice at the same time any fee is deducted from their account or charged to their credit card. There is no charge for partial-month usage. Snider Advisors reserves the right to negotiate individual fee agreements.

### INSURANCE PRODUCT SALES

Certain employees of our firm are licensed to sell insurance. We typically will advise our clients on and provide Long-Term Care, Life, MediGap, Health and Disability Insurance products as agents of insurance companies. Snider Advisors as a company receives a commission from the sale of these policies. The employee does not receive any part of the commission. However, the volume of sales any employee achieves will likely have an impact on other discretionary incentive compensation programs, such as quarterly bonuses.

The incentives offered by insurance companies inherently cause a conflict of interest. We recognize this conflict and provide our clients with choices between several insurance companies to ensure that their needs are the primary focus. We explain the benefits and drawbacks of each product and allow the client to make the final decision on which insurance product or company to select. Clients are under no obligation, contractually or otherwise, to purchase insurance products through any person affiliated with the Advisor. Clients have the option to purchase insurance products from a different insurance broker or agent.

### GENERAL INFORMATION

*Termination of the Advisory Relationship:* A client agreement may be canceled at any time, by either party, for any reason upon written notice. As disclosed above, the only fee paid in advance is the \$10 monthly consulting fee. Upon termination, a full refund can be requested for any advanced payment. At the termination of any other services, the accrued, unpaid fees are due and payable. In calculating asset management fees, we will prorate the final fee according to the number of days remaining in the billing period.

*ETF Fees:* All fees paid to Snider Advisors and Chrisilis for investment advisory services are separate and distinct

from the fees and expenses charged by ETFs to their shareholders. These fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee. If the fund also imposes sales charges, a client may pay an initial or deferred sales charge. A client could invest in an ETF directly, without our services. In that case, the client would not receive the services provided by our firm which are designed, among other things, to assist the client in determining which ETFs are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the ETFs and our fees to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

*Additional Fees and Expenses:* In addition to our advisory fees, clients are also responsible for the fees and expenses charged by custodians and imposed by broker dealers, including, but not limited to, any transaction charges imposed by a broker dealer or custodian. Some of the Advisors recommended custodians do not charge securities transaction fees for ETF and equity trades in a client's account, provided that the account meets the terms and conditions of the custodian's brokerage requirements. However, the custodians typically charge for mutual funds and other types of investments. Please refer to the "Brokerage Practices" section (Item 12) of this Form ADV for additional information.

*Grandfathering of Minimum Account Requirements:* Pre-existing advisory clients are subject to Snider Advisors' minimum account requirements and advisory fees in effect at the time the client entered the advisory relationship. Therefore, our firm's minimum account requirements will differ among clients.

*Advisory Fees in General:* Clients should note that similar advisory services may (or may not) be available from other registered (or unregistered) investment advisers for similar or lower fees. Also, registration does not imply a certain level of skill or training.

*Limited Prepayment of Fees:* Under no circumstances do we require or solicit payment of fees more than \$1,200 more than six months in advance of services rendered.

*Negotiation of Fees:* Chronim reserves the right to negotiate individual fee agreements and/or run fee discounts or limited time specials on pricing.

Clients can terminate any contract with no penalty at any time.

\*Lower fees for comparable services may be available from other sources.

## ITEM 6 PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

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Chronim does not charge performance-based fees.

## ITEM 7 TYPES OF CLIENTS

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Chronim provides advisory services to the following types of clients:

- Individuals (other than high net worth individuals)
- Corporations, partnerships and other entities
- High net worth individuals

As previously disclosed in Item 5, our firm has established certain initial minimum account requirements, based on the nature of the service(s) being provided. For a more detailed understanding of those requirements, please review the disclosures provided in each applicable service.

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

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### Methods of Analysis

We use the following methods of analysis in formulating our investment advice and/or managing client assets:

*Fundamental Analysis.* The Snider Method attempts to identify fundamentally sound companies with high price volatility. To do this, we use credit scoring techniques which use fundamental data.

This fundamental analysis does not attempt to anticipate market movements. This presents a potential risk, as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the stock.

*Asset Allocation.* Our proprietary stock screener, Lattco, can diversify positions among various industry sectors. The Snider Method attempts to balance cash and positions in securities to produce stable income.

A risk of asset allocation is that the client may not participate in sharp increases in a security, industry or market sector. Another risk is that the ratio of securities, fixed income, and cash will change over time due to stock and market movements and, if not corrected, will no longer be appropriate for the client's goals.

*Risks for all forms of analysis.* Our securities analysis methods rely on the assumption that the companies whose securities we purchase and sell, the rating agencies that review these securities, and other publicly-available sources of information about these securities, are providing accurate and unbiased data. While we are alert to indications that data may be incorrect, there is always a risk that our analysis may be compromised by inaccurate or misleading information.

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### Snider Advisors Investment Strategies

Snider Advisors uses the Snider Method investment strategy. This strategy combines stock purchases, option sales, and cash balances with the objective of providing current income.

*Long-term purchases.* We purchase securities we may potentially hold for long periods of time. The risks of holding securities for long periods of time is the stock may decline in price or go bankrupt.

*Short-term purchases.* We purchase securities we may potentially hold for short periods of time. The risk of holding securities for short periods of time and replacing them with other stocks is higher transactions costs.

*Margin transactions.* The Snider Method occasionally requires you to purchase stocks with money borrowed from your broker. This allows you to purchase more stock than you would be able to with your available cash. You must pay margin interest on the amount of money borrowed from your broker.

A risk in margin trading is that, in volatile markets, securities' prices can fall very quickly. If the value of the securities in your account minus what you owe the broker falls below a certain level, the broker will issue a "margin call", and you will be required to sell your position in the security purchased on margin or add more cash to the account. In some circumstances, you may lose more money than you originally invested.

*Option writing.* We use options as part of our investment strategy. An option is a contract that gives the buyer

the right, but not the obligation, to buy or sell an asset (such as a share of stock) at a specific price on or before a certain date. An option, just like a stock or bond, is a security. An option is also a derivative because it derives its value from an underlying asset.

The two types of options are calls and puts:

- A call gives the buyer the right to buy an asset at a certain price within a specific period of time in exchange for a premium paid to the seller. We typically sell calls as part of our investment strategy.
- A put gives the buyer the right to sell an asset at a certain price within a specific period of time in exchange for a premium paid to the seller. We typically sell puts as part of our investment strategy.

We use covered calls and cash-secured puts, in which we sell options on securities we own (or have earmarked cash to buy). In this strategy, you receive a premium for making the option available, and the person purchasing the option has the right to buy the security from you at an agreed-upon price. When calls are exercised, clients are forced to sell their security at the strike price of the call option. This is likely below the market value of the security. When a put is assigned, clients are forced to purchase the security at the strike price of the put option. This is likely at a price above the market value of the security.

Some of the risks of this strategy are: 1) We own the stock, so if the price declines, we have an unrealized loss. 2) We give away some of the potential price increase because we agreed to sell the security at the option strike price. 3) We own the stock, so if the company goes bankrupt, we have a realized loss.

### Chrisilis Investment Strategies

Chrisilis uses various ETFs to create a diversified portfolio of multiple asset classes. Based off the suitability and risk tolerances of the client, we recommend balanced portfolios with investments in stock, bond, emerging market, real estate, and commodity funds.

*Long-term purchases.* We purchase securities we may potentially hold for long periods of time. The risk of holding securities for long periods of time is the fund may decline in price.

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### Risk of Loss

Securities investments are not guaranteed, and you may lose money on your investments. Investing in securities involves risk of loss that clients should be prepared to bear. We ask that you work with us to help us understand your tolerance for risk.

Each of the types of securities in which we invest present unique risks:

Exchange-Listed Securities are exposed to loss of principal, risk of market declines, economic risks, and specific company risk that can include fraud or unfavorable events unique to only the company.

Exchange Traded Funds (ETFs) are exposed to loss of principal, risk of market declines, economic risks, and the same risks of owning the underlying securities held in the fund.

Exchange-Listed Options are only sold in our investment strategies. The risks of selling a call includes the limited upside of price appreciation in exchange for a premium. When selling a put we risk purchasing additional shares at a strike price that may be above the market price.

## ITEM 9 DISCIPLINARY INFORMATION

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### Legal and Disciplinary

Our firm and our management personnel have no reportable disciplinary events to disclose.

## ITEM 10 OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

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### Insurance Products

Certain employees of our firm are licensed to sell insurance. We typically will advise our clients on and provide Long-Term Care, Life, MediGap, Health and Disability Insurance products as agents of insurance companies. Chronim as a company receives a commission from the sale of these policies. The employee does not receive any part of the commission. However, the volume of sales any employee achieves will likely have an impact on other discretionary incentive compensation programs, such as quarterly bonuses.

The incentives offered by insurance companies inherently cause a conflict of interest. We recognize this conflict and provide our clients with choices between several insurance companies to ensure that their needs are the primary focus. We explain the benefits and drawbacks of each product and allow the client to make the final decision on which insurance product or company to select. Clients are under no obligation, contractually or otherwise, to purchase insurance products through any person affiliated with the Advisor.

As mentioned previously, we do recommend and provide insurance-based products on occasion to fill the needs of our current clients. The following individuals are licensed insurance representatives:

Jesse G. Anderson – Less than 5% of time allocated to insurance products and registered in Texas

Shelley Seagler – 20% of time spent on insurance solutions and registered in Texas

### optionDash

optionDash (“optionDash”) is an affiliated entity under common control with the Advisor. OptionDash is an online covered call screening tool. It is designed to give covered call investors easy access to the data necessary to find income-producing covered call trades. There may be additional charges if a Client chooses to engage optionDash. This presents a conflict of interest as management persons stand to benefit from additional compensation. Clients are under no obligation, contractually or otherwise, to utilize this online tool.

### TrackYourDividends

TrackYourDividends (“TrackYourDividends”) is an affiliated entity under common control with the Advisor. TrackYourDividends is an online tool that helps investors keep track of dividend payments, yields, annual income, and future dividend growth. There may be additional charges if a Client chooses to engage TrackYourDividends. This presents a conflict of interest as management persons stand to benefit from additional compensation. Clients are under no obligation, contractually or otherwise, to utilize this online tool.



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

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### Code of Ethics

Our firm has adopted a Code of Ethics which sets forth high ethical standards of business conduct that we require of our employees, including compliance with applicable federal securities laws.

Chronim and our personnel owe a duty of loyalty, fairness and good faith towards our clients, and have an obligation to adhere not only to the specific provisions of the Code of Ethics but to the general principles that guide the Code.

Our Code of Ethics includes policies and procedures for the review of quarterly securities transactions reports as well as initial and annual securities holdings reports that must be submitted by the firm's access persons. Among other things, our Code of Ethics also requires the prior approval of any acquisition of securities in a limited offering (e.g., private placement) or an initial public offering. Our code also provides for oversight, enforcement and recordkeeping provisions.

Chronim's Code of Ethics further includes the firm's policy prohibiting the use of material non-public information. While we do not believe that we have any access to non-public information, all employees are reminded that such information may not be used in a personal or professional capacity.

A copy of our Code of Ethics is available to our advisory clients and prospective clients. You may request a copy by email sent to [support@snideradvisors.com](mailto:support@snideradvisors.com) or [support@chrisilis.com](mailto:support@chrisilis.com), or by calling us at 214-220-0055.

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### Participation or Interest in Client Transactions

Chronim and individuals associated with our firm are prohibited from engaging in principal transactions and agency cross transactions.

Our Code of Ethics is designed to assure that the personal securities transactions, activities and interests of our employees will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts.

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### Personal Trading

Our employees can personally partake in our investment method with their personal assets. The Snider Method consists of trading once on a month on the first Monday following options expiration. Individuals associated with our firm may buy or sell for their personal accounts' securities identical to or different from those recommended to our clients. In addition, any related person(s) may have an interest or position in securities which may also be recommended to a client.

It is the policy of our firm that no person employed by us may purchase or sell any security prior to a transaction(s) being implemented for an advisory account, thereby preventing such employee(s) from benefiting from transactions placed on behalf of advisory accounts.

To address this conflict of interest we have implemented a strict "black out" period on all securities trading for our employees to prevent them from trading prior to or during normal Snider Method trading periods. It includes

our Trade Day and the 7 days preceding it (Trade Day is the Monday after option expiration). All employees have duplicate brokerage statements for personal accounts submitted to our Chief Compliance Officer monthly to ensure this “black out” period policy is followed.

Employees implementing Chrisilis portfolios and trade recommendations are not subject to our “black out” period. The ETFs used in these portfolios are not applicable to the Snider Method. As a result, trading these securities will not harm our Snider Advisors’ clients. Employee trades to implement, rebalance, and reinvest distributions in Chrisilis portfolios may be grouped with clients’ trades and executed simultaneously. Employees may have a reduced or waived Chrisilis asset management fee.

## ITEM 12 BROKERAGE PRACTICES

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### SELECTING BROKERAGE FIRMS

Chronim Investments does not have the authority to determine the broker/dealer to be used by our clients or commission rates paid by our clients without obtaining specific client consent. Also, we do not maintain custody of the assets that we manage or which we advise. However, we do suggest broker(s) to our clients and we do require managed accounts be opened at our recommended broker/dealer(s). We are independently owned and operated and not affiliated with any broker/dealer(s).

The factors we consider when recommending broker/dealer(s) to clients include financial strength, reputation, execution, pricing, research, and service. Commission rates for recommended broker(s) are generally considered discounted from customary retail rates but may be higher or lower than those charged by other broker/dealer(s). We will only establish accounts with broker/dealer(s) that provide timely service and fair price. Technological support as well as platform expertise are major factors in recommending brokers to our clients.

We also make annual evaluations of alternative broker/dealers to ensure that our clients are receiving the value and service they deserve. If we were to find a better broker/dealer, we have no reservations of making a transition at that time.

As a fiduciary, Chronim has an obligation to act in the best interest of its clients and to place its clients' interests before its own. We have the responsibility to regularly and frequently evaluate our recommendations of broker/dealers to ensure our clients are getting the Best Execution available.

Depending on the type of client and their current investment strategy, we are likely to recommend one of three brokers: Interactive Brokers, Ally Invest, and Schwab. Each firm has its own positives and negatives and may not be appropriate for all types of clients and trading.

Snider Advisors may refer clients to the unaffiliated broker-dealer, Ally Invest. Because of this arrangement, Ally Invest will pay Snider Advisors a flat referral fee if the clients fund an account with them. The fee is not contingent on any other activity such as total assets or trading activity. Clients are under no obligation to act upon any recommendations of Snider Advisors or to effect any transactions through Ally Invest. While we endeavor at all times to put the interest of our clients first as part of our fiduciary duty, the possibility of receiving incentive awards creates a conflict of interest and may affect the judgment of these individuals when making recommendations. A conflict of interest may arise between the client's interest in obtaining best price and execution and Snider’s interest in receiving future referral fees. To mitigate this conflict, clients have the option to open accounts through other unaffiliated broker-dealers.

Snider Advisors also receives a flat monthly payment from Ally Invest to create and deliver training, seminars, and webinars for educational purposes. We collaborate with Ally Invest to create marketing and educational

content in formats such as paper advertising, internet advertising, video content, whitepapers, webinars, seminars, and other materials for use with Ally Invest and Snider Advisors' clients.

Snider Advisors' Discretionary Investment Management clients must open an account at Interactive Brokers LLC. Chrisilis' Discretionary Investment Management clients must open an account at Schwab. We do not have the technological and operational infrastructure to accommodate multiple investment strategies trading through different broker-dealers. We believe each firm is best for their respective groups of clients based off the previously mentioned selection criteria and trading activity. We receive no special research or services from our recommended brokers.

Client transactions generally will be made independently, unless we decide to purchase or sell the same securities for several clients at approximately the same time. We may (but are not obligated to) combine such orders to obtain best execution, better commission rates, or to allocate equitably among our clients differences in prices, commissions, or other transaction costs that might have been obtained if the orders had been placed independently. Under this procedure, transactions will generally be averaged as to price and allocated among our clients pro rata to the purchase and sale orders placed for each client on any given day. The extent we aggregate client orders for the purchase or sale of securities are in accordance with the parameters set forth in SEC No-Action Letter, SMC Capital, Inc. We will not receive any additional compensation or remuneration because of the aggregation.

Consulting clients may decide to use any broker-dealer to execute some or all of their transactions. However, we currently recommend Ally Invest for this group of clients. In the case they select a different firm, the client will have the sole responsibility for negotiating commission rates and other transaction costs with the broker/dealer. If a client selects a specific broker, we will not be required to effect any transaction through the specified broker if we reasonably believe that to do so may result in a breach of fiduciary duties. We will not seek better execution services or prices from other broker-dealers or be able to batch client transactions for execution through other broker-dealers with orders for other accounts managed by Snider Advisors. As a result, the client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case.

## ITEM 13 REVIEW OF ACCOUNTS

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### Snider Advisors Asset Management Services

*REVIEWS:* While the underlying securities within Asset Management Services accounts are continually monitored, these accounts are reviewed monthly. Accounts are reviewed in the context of the Snider Method.

These accounts are reviewed by Jesse Anderson, the Chief Investment Officer of Snider Advisors.

*REPORTS:* In addition to the quarterly statements and confirmations of transactions that clients receive from their broker-dealer, we provide monthly and annual reports summarizing account performance.

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### Snider Advisors: Level 1 Consulting

*REVIEWS:* Accounts are not reviewed for clients who use Consulting Services, since these clients are primarily responsible for trading their own accounts using the methods taught in our seminars. Snider Advisors personnel are available to review account at the request of the client.

*REPORTS:* Clients will typically receive monthly statements and confirmations of transactions from their broker-

dealer. Snider Advisors will not provide additional reports.

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#### Lattco PRO

*REVIEWS:* Accounts are reviewed monthly for clients who use Lattco PRO. Accounts are monitored in the context of the Snider Investment Method. Activity is downloaded and monitored electronically for inconsistencies.

*NOTIFICATIONS:* Clients will be contracted individually via phone or email if their account lacks the normal Snider Method activity or has unusual activity. Any communication related to a specific security will be sent via email through our blast email software to ensure everyone receives the information equally.

*REPORTS:* Clients will typically receive monthly statements and confirmations of transactions from their broker-dealer. Snider Advisors will provide continuous access to online reports summarizing account performance.

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#### Lattco AutoPilot Services

*REVIEWS:* Accounts are reviewed monthly for clients who use Lattco AutoPilot. Accounts are monitored in the context of the Snider Investment Method. Activity is downloaded and monitored electronically for inconsistencies.

*NOTIFICATIONS:* Clients will be contracted individually via phone or email if their account lacks the normal Snider Method activity or has unusual activity. Any communication related to a specific security will be sent via email through our blast email software to ensure everyone receives the information equally.

*REPORTS:* Clients will typically receive monthly statements and confirmations of transactions from their broker-dealer. Snider Advisors will provide continuous access to online reports summarizing account performance.

#### Chrisilis Investment Management Services

*REVIEWS:* Underlying securities within client accounts are monitored daily. Accounts are reviewed in the context of target portfolio allocations.

These accounts are reviewed by the investment managers of Chrisilis.

*REPORTS:* In addition to the monthly statements and confirmations of transactions that clients receive from their broker-dealer, they have continuous access to online reports summarizing account performance.

## ITEM 14 CLIENT REFERRALS AND OTHER COMPENSATION

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### Client Referrals

Chronim has been fortunate to receive many client referrals over the years. The referrals have come from current clients, accountants, employees, personal friends of employees and other sources. The firm does not pay for referrals.

### Other Compensation

#### Interactive Brokers

Snider Advisors participates in Interactive Brokers' institutional customer program and the Advisor may recommend Interactive Brokers to clients for custody and brokerage services. There is no direct link between the

Advisor's participation in the program and the investment advice it gives to its clients, although the Advisor receives economic benefits through its participation in the program that are typically not available to Interactive Brokers' retail investors. 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 the Advisor participants; the ability to have advisory fees deducted directly from client accounts; and discounts on research, technology, and related services provided to the Advisor by third party vendors. Some of the products and services made available by Interactive Brokers through the program may benefit the Advisor but may not benefit its client accounts. These products or services may assist the Advisor in managing and administering client accounts, including accounts not maintained at Interactive Brokers. The benefits received by the Advisor through participation in the program do not depend on the amount of brokerage transactions directed to Interactive Brokers. As part of its fiduciary duties to clients, Snider Advisors endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by Snider Advisors or its related persons in and of itself creates a conflict of interest and may indirectly influence the Advisor's choice of Interactive Brokers for custody and brokerage services.

### Ally Invest

Chronim receives without cost, access to clients' accounts and data to support clients trading on the Ally Invest platform. This allows us to better monitor client accounts maintained at Ally Invest. These services are offered on similar terms by Ally Invest to all its affiliated advisors and retail clients.

Snider Advisors also receives a flat monthly payment from Ally Invest to create and deliver training, seminars, and webinars for educational purposes. We collaborate with Ally Invest to create marketing and educational content in formats such as paper advertising, internet advertising, video content, whitepapers, webinars, seminars, and other materials for use with Ally Invest and Snider Advisors' clients.

While we always endeavor to put the interest of our clients first as part of our fiduciary duty, the possibility of receiving incentive awards creates a conflict of interest and may affect the judgment of these individuals when making recommendations. A conflict of interest may arise between the client's interest in obtaining best price and execution and Snider's interest in receiving future referral fees. To mitigate this conflict, clients have the option to open accounts through other unaffiliated broker-dealers.

### Charles Schwab

We receive an economic benefit from Schwab in the form of the support products and services it makes available to us and other independent investment advisors that have their clients maintain accounts at Schwab. The availability to us of Schwab's products and services is not based on us giving investment advice, such as buying particular securities for our clients.

Schwab Advisor Services is Schwab's business serving independent investment advisory firms like us. They provide us and our clients with access to its institutional brokerage – trading, custody, reporting and related services – many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help us manage or administer our clients' accounts while others help us manage and grow our business. Schwab's support services are generally available on an unsolicited basis (we don't have to request them) and at no charge to us as long as we keep a total of at least \$10 million of our clients' assets in accounts at Schwab.

Here is a more detailed description of Schwab's support services:



*Services that Benefit You* – Schwab’s institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. Schwab’s services described in this paragraph generally benefit you and your account.

*Services that May Not Directly Benefit You* – Schwab also makes available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our clients’ accounts. They include investment research, both Schwab’s own and that of third parties. We may use this research to service all or some substantial number of our clients’ accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:

- Provide access to client account data (such as duplicate trade confirmations and account statements)
- Facilitate trade execution and allocate aggregated trade orders for multiple client accounts
- Provide pricing and other market data
- Facilitate payment of our fees from our clients’ accounts
- Assist with back-office functions, recordkeeping and client reporting

*Services that Generally Benefit Only Us* – Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:

- Educational conferences and events
- Technology, compliance, legal, and business consulting
- Publications and conferences on practice management and business succession
- Access to employee benefits providers, human capital consultants and insurance providers

Schwab may provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. Schwab may also discount or waive its fees for some of these services or pay all or a part of a third party’s fees. Schwab may also provide us with other benefits such as occasional business entertainment of our personnel.

*Our Interest in Schwab’s Services* – The availability of these services from Schwab benefits us because we do not have to produce or purchase them. We don’t have to pay for Schwab’s services so long as we keep a total of at least \$10 million of client assets in accounts at Schwab. The \$10 million minimum may give us an incentive to recommend or require that you maintain your account with Schwab based on our interest in receiving Schwab’s services that benefit our business rather than based on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a conflict of interest. We believe, however, that our selection of Schwab as custodian and broker is in the best interests of our clients. It is primarily supported by the scope, quality and price of Schwab’s services based on the factors discussed above.

## ITEM 15 CUSTODY

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We previously disclosed in the "Fees and Compensation" section (Item 5) of this Brochure that our firm directly debits advisory fees from client accounts.

As part of this billing process, the client's custodian is advised of the amount of the fee to be deducted from that client's account. On at least a quarterly basis, the custodian is required to send to the client a statement showing all transactions within the account during the reporting period.

Because the custodian does not calculate the amount of the fee to be deducted, it is important for clients to carefully review their custodial statements to verify the accuracy of the calculation, among other things. Clients should contact us directly if they believe that there may be an error in their statement.

Our firm does not have actual or constructive custody of client accounts or funds.

## ITEM 16 INVESTMENT DISCRETION

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### Discretionary Authority for Trading

Clients may hire us to provide discretionary asset management services, in which case we place trades in a client's account without contacting the client prior to each trade to obtain the client's permission.

Our discretionary authority includes the ability to do the following without contacting the client:

- Determine the security to buy or sell; and/or
- Determine the amount of the security to buy or sell

Clients give us discretionary authority when they sign a discretionary agreement with our firm. Should a client have certain restrictions on specific stock transactions, we can assist them in implementing the strategy with those restrictions accounted for.

Snider Advisors Clients may hire us to provide consulting services, in which case we place trades in a client's account only if specifically requested by the client. Clients may also request that we perform the monthly trades specified by the Snider Method if they are unable to access the market when required to do so. These Vacation Trade requests trigger a short window of time in which we have discretionary authority to place trades in their accounts. Under this discretionary authority we follow the same process and place the same trades as dictated by the strict rules of the Snider Investment Method.

Our discretionary authority includes the ability to do the following without contacting the client:

- Determine the security to buy or sell; and/or
- Determine the amount of the security to buy or sell

Clients give us discretionary authority when they sign our client agreement, sign a limited trading authorization, and request a Vacation Trade. They may not limit this authority.

## ITEM 17 VOTING CLIENT SECURITIES

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### Proxy Votes

As a matter of firm policy, we do not vote proxies on behalf of clients. Therefore, although our firm may provide investment advisory services relative to client investment assets, clients maintain exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the client's investment assets. Clients are responsible for instructing each custodian of the assets, to forward to the client copies of all proxies and shareholder communications relating

to the client's investment assets.

We do not offer any consulting assistance regarding proxy issues to clients.

## ITEM 18 FINANCIAL INFORMATION

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### Financial Condition

Chronim does not have any financial impairment that will preclude the firm from meeting contractual commitments to clients. A balance sheet is not required to be provided because Chronim does not serve as the custodian for client funds or securities and does not require payment of fees of more than \$1,200 per client, six months or more in advance.

Chronim has not been the subject of a bankruptcy petition at any time.



**CHRONIM INVESTMENTS, INC.**  
**DBA SNIDER ADVISORS**  
**DBA CHRISILIS**

Business Address: 100 Decker Court, Suite 120, Irving, TX 75062  
Business Phone: (214)220-0055

Snider Advisors: [support@snideradvisors.com](mailto:support@snideradvisors.com)  
[www.snideradvisors.com](http://www.snideradvisors.com)

Chrisilis: [support@chrisilis.com](mailto:support@chrisilis.com)  
[www.chrisilis.com](http://www.chrisilis.com)

March 3, 2021

This Form ADV Part 2B, also called the “Brochure Supplement,” provides information about the following supervised persons employed by Chronim Investments, Inc.:

Jesse G. Anderson, Chronim Investments: Chief Compliance Officer  
Snider Advisors: Chief Executive Officer / Chief Investment Officer  
Chrisilis: President  
Direct Line: (214)446-8533

Shelley Seagler, Snider Advisors: Manager of Training  
Direct Line: (214)446-8538

Tyler Curtis, Snider Advisors: Chief Operating Officer  
Chrisilis: Chief Executive Officer  
Direct Line: (214)446-8541

Robert Brauer, Snider Advisors: Financial Advisor  
Direct Line: (214)446-8529

The information about the above-named supervised persons, set forth below, supplements the Chronim Investments “Firm Brochure.” You should have received a copy of that brochure. Please contact Jesse Anderson at (214)446-8533 if you did not receive the Chronim “Firm Brochure” or if you have any questions about the contents of this brochure.

“Supervised persons” within Chronim covered by the Brochure Supplement are identified as persons who: (i) formulate investment advice for clients and have direct client contact; or (ii) make discretionary investment decisions for clients’ assets, even if the supervised person has no direct client contact. Hence, this Brochure Supplement provides information for registered representatives of Chronim as well as the firm’s leadership.

In the information about each supervised person provided below:

“Educational background” refers to the supervised person’s post-high school education.

“Business background” refers to the supervised person’s business experience for the last 5 years.

“Disciplinary information” refers to legal or disciplinary events that are material to your evaluation of the supervised person, such as civil lawsuits, proceedings before a government or self-regulatory agency relating to investment activity, or criminal proceedings.

“Other business activities” refers to whether the supervised person is actively engaged in any investment-related business or occupation other than his or her employment by Chronim.

“Additional compensation” refers to whether the supervised person receives an economic benefit for providing investment advice other than his or her regular salary from Chronim.

“Supervisor” refers to the person at Chronim who supervises the supervised person’s investment activities on behalf of the firm. The supervision takes place in various forms: attending client meetings and seminars, listening to the supervised persons’ telephone conversations with clients, regular meetings with the supervised persons and handling client complaints. In addition, there are a number of internal controls related to the supervised persons where reporting is made to the President/CEO and Chief Compliance Officer.

## JESSE G. ANDERSON, CFA

100 Decker Court, Suite 120, Irving TX 75062

Business Phone: (214)446-8533

Email: [janderson@snideradvisors.com](mailto:janderson@snideradvisors.com) & [janderson@chrisilis.com](mailto:janderson@chrisilis.com)

Web: [www.snideradvisors.com](http://www.snideradvisors.com) & [www.chrisilis.com](http://www.chrisilis.com)

Year of birth: 1983

Educational background: Bachelor of Science in Business Administration – Robert Morris University

Business background:

*Chronim Investments, Inc* – Employee (05/2005 to Present), Chief Compliance Officer (2011-Present)

optionDash.com – Owner (01/2021 to Present)

TrackYourDividends – Owner (01/2021 to Present)

Professional Designations:

*Chartered Financial Analyst* – The Chartered Financial Analyst (CFA) charter is a globally respected, graduate-level investment credential established in 1962 and awarded by CFA Institute — the largest global association of investment professionals.

There are currently more than 90,000 CFA charter holders working in 134 countries. To earn the CFA charter, candidates must:

- 1) Pass three sequential, six-hour examinations;
- 2) Have at least four years of qualified professional investment experience;
- 3) Join CFA Institute as members
- 4) Commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

High Ethical Standards

The CFA Institute Code of Ethics and Standards of Professional Conduct, enforced through an active professional conduct program, require CFA charter holders to:

- Place their clients' interests ahead of their own
- Maintain independence and objectivity
- Act with integrity
- Maintain and improve their professional competence
- Disclose conflicts of interest and legal matters

Global Recognition

Passing the three CFA exams is a difficult feat that requires extensive study (successful candidates report spending an average of 300 hours of study per level). Earning the CFA charter demonstrates mastery of many of the advanced skills needed for investment analysis and decision making in today's quickly evolving global financial industry. As a result, employers and clients are increasingly seeking CFA charter holders—often making the charter a prerequisite for employment. Additionally, regulatory bodies in 22 countries and territories recognize the CFA charter as a proxy for meeting certain licensing requirements, and more than 125 colleges and universities around the world have incorporated a majority of the CFA Program curriculum into their own finance courses.

### Comprehensive and Current Knowledge

The CFA Program curriculum provides a comprehensive framework of knowledge for investment decision making and is firmly grounded in the knowledge and skills used every day in the investment profession. The three levels of the CFA Program test a proficiency with a wide range of fundamental and advanced investment topics, including ethical and professional standards, fixed-income and equity analysis, alternative and derivative investments, economics, financial reporting standards, portfolio management, and wealth planning.

The CFA Program curriculum is updated every year by experts from around the world to ensure that candidates learn the most relevant and practical new tools, ideas, and investment and wealth management skills to reflect the dynamic and complex nature of the profession.

To learn more about the CFA charter, visit [www.cfainstitute.org](http://www.cfainstitute.org).

Disciplinary information: None

Other business activities: Licensed Insurance Representative (TX License# 1721455) Jesse Anderson spends less than 5% of his time on insurance-based solutions.

Jesse Anderson is also an Owner of optionDash (“optionDash”), an affiliated entity under common control with the Advisor. OptionDash is an online covered call screening tool. It is designed to give covered call investors easy access to the data necessary to find income-producing covered call trades. There may be additional charges if a client chooses to engage optionDash. This presents a conflict of interest as Jesse Anderson stands to benefit from additional compensation. Clients are under no obligation, contractually or otherwise, to utilize this online tool. Jesse Anderson spends less than 10% of his time in this capacity.

Jesse Anderson is also an Owner of TrackYourDividends (“TrackYourDividends”), an affiliated entity under common control with the Advisor. TrackYourDividends is an online tool that helps investors keep track of dividend payments, yields, annual income, and future dividend growth. There may be additional charges if a client chooses to engage TrackYourDividends. This presents a conflict of interest as Jesse Anderson stands to benefit from additional compensation. Clients are under no obligation, contractually or otherwise, to utilize this online tool. Jesse Anderson spends less than 10% of his time in this capacity.

Additional compensation: Advisors are not compensated directly for the sale of any investment or insurance products; however, the firm does receive commissions and may indirectly compensate the advisors based on the volume of sales. The incentives offered by insurance companies inherently cause a conflict of interest.

Jesse Anderson is compensated for his ownership position with optionDash and TrackYourDividends.

Supervised by:

Tyler Curtis (214-446-8541) is responsible for all supervision and monitoring of investment advice offered to clients by Jesse G. Anderson. He monitors Jesse’s work through frequent office interactions as well as remote interactions. He also reviews Jesse’s activities through our client relationship management system.

At least once a year, employees are required to review our Policies and Procedures and Code of Ethics manuals. They require that all violations or reportable events be brought to the attention of the Manager for remediation or resolution. If the violation or reportable event involves the Manager, the Chief Financial Officer will act in his place.

This advisor has never been found liable in an arbitration claim, civil, self-regulatory organization, or administrative proceeding involving any of the following:

- (a) An investment or an investment-related business activity
- (b) Fraud, false statement(s), or omissions
- (c) Theft, embezzlement, or other wrongful taking of property
- (d) Bribery, forgery, counterfeiting, or extortion
- (e) Dishonest, unfair, or unethical practices

Additional information about Jesse G. Anderson (CRD# 5002910) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

# Shelley Seagler

100 Decker Court, Suite 120, Irving TX 75062

Business Phone: (214)220-0055

Email: [sseagler@snideradvisors.com](mailto:sseagler@snideradvisors.com) & [sseagler@chrisilis.com](mailto:sseagler@chrisilis.com)

Web: [www.snideradvisors.com](http://www.snideradvisors.com) & [www.chrisilis.com](http://www.chrisilis.com)

Year of birth: 1970

Educational background: Bachelor of Science – Texas Woman’s University

Business background:

*Chronim Investments, Inc* – Employee (11/2007 to Present)

*Pecunia Investments, Inc* – Manager of Training (10/2005 to 11/2007)

Disciplinary information: None

Other business activities: Licensed Insurance Representative (TX#-1604592). Shelley Seagler spends 35% of her time dealing with insurance-based solutions.

Additional compensation: Advisors are not compensated directly for the sale of any investment or insurance products; however, the firm does receive commissions and may indirectly compensate the advisors based on the volume of sales. The incentives offered by insurance companies inherently cause a conflict of interest.

Supervised by:

Jesse Anderson, CFA is the Manager and Chief Compliance Officer of the firm and is responsible for the firm’s activities. He is responsible for all supervision and monitoring of investment advice offered to clients by Shelley Seagler. He can be reached directly at 214-446-8533. He monitors Shelley Seagler’s work through frequent office interactions as well as remote interactions. He also reviews Shelley Seagler’s activities through our client relationship management system.

At least once a year, employees are required to review our Policies and Procedures and Code of Ethics manuals. They require that all violations or reportable events be brought to the attention of the Manager for remediation or resolution. If the violation or reportable event involves the Manager, the Chief Financial Officer will act in his place.

This advisor has never been found liable in an arbitration claim, civil, self-regulatory organization, or administrative proceeding involving any of the following:

- (a) An investment or an investment-related business activity
- (b) Fraud, false statement(s), or omissions
- (c) Theft, embezzlement, or other wrongful taking of property
- (d) Bribery, forgery, counterfeiting, or extortion
- (e) Dishonest, unfair, or unethical practices

Additional information about Shelley Seagler (CRD# 5451277) is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Tyler Curtis

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Web: [www.snideradvisors.com](http://www.snideradvisors.com) & [www.chrisilis.com](http://www.chrisilis.com)

Year of birth: 1985

Educational background: Bachelor of Science – Oklahoma State University

Business background:

*Chronim Investments, Inc* – Employee (06/2007 to Present)

optionDash.com – Owner (01/2021 to Present)

TrackYourDividends – Owner (01/2021 to Present)

Disciplinary information: None

Other business activities:

Tyler Curtis is also an Owner of optionDash (“optionDash”), an affiliated entity under common control with the Advisor. OptionDash is an online covered call screening tool. It is designed to give covered call investors easy access to the data necessary to find income-producing covered call trades. There may be additional charges if a client chooses to engage optionDash. This presents a conflict of interest as Tyler Curtis stands to benefit from additional compensation. Clients are under no obligation, contractually or otherwise, to utilize this online tool. Tyler Curtis spends less than 10% of his time in this capacity.

Tyler Curtis is also an Owner of TrackYourDividends (“TrackYourDividends”), an affiliated entity under common control with the Advisor. TrackYourDividends is an online tool that helps investors keep track of dividend payments, yields, annual income, and future dividend growth. There may be additional charges if a client chooses to engage TrackYourDividends. This presents a conflict of interest as Tyler Curtis stands to benefit from additional compensation. Clients are under no obligation, contractually or otherwise, to utilize this online tool. Tyler Curtis spends less than 10% of his time in this capacity.

Additional compensation:

Tyler Curtis is compensated for his ownership position with optionDash and TrackYourDividends.

Supervised by:

Jesse Anderson, CFA is the Manager and Chief Compliance Officer of the firm and is responsible for the firm’s activities. He is responsible for all supervision and monitoring of investment advice offered to clients by Tyler Curtis. He can be reached directly at 214-446-8533. He monitors Tyler Curtis’s work through frequent office interactions as well as remote interactions. He also reviews Tyler Curtis’s activities through our client relationship management system.

At least once a year, employees are required to review our Policies and Procedures and Code of Ethics manuals. They require that all violations or reportable events be brought to the attention of the Manager for remediation

or resolution. If the violation or reportable event involves the Manager, the Chief Financial Officer will act in his place.

This advisor has never been found liable in an arbitration claim, civil, self-regulatory organization, or administrative proceeding involving any of the following:

- (a) An investment or an investment-related business activity
- (b) Fraud, false statement(s), or omissions
- (c) Theft, embezzlement, or other wrongful taking of property
- (d) Bribery, forgery, counterfeiting, or extortion
- (e) Dishonest, unfair, or unethical practices

Additional information about Tyler Curtis (CRD# 5369644) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).



## ROBERT BRAUER, CFP

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Web: [www.snideradvisors.com](http://www.snideradvisors.com) & [www.chrisilis.com](http://www.chrisilis.com)

Year of birth: 1988

Educational background: Bachelor of Arts- Texas Tech University, Lubbock, Texas; Master of Arts- Texas Tech University

Business background:

*Chronim Investments, Inc* – Employee (10/2014 to Present)

*Wellington Claim Service, Inc.* – Claims Examiner (02/2013-08/2014)

*Real Time Resolutions, Inc.* – Collections Analyst (10/2012 to 01/2013)

Professional Designations:

The CFP<sup>®</sup> certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP<sup>®</sup> certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 71,000 individuals have obtained CFP<sup>®</sup> certification in the United States.

To attain the right to use the CFP<sup>®</sup> marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP<sup>®</sup> Certification Examination. The examination includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and Ethics – Agree to be bound by CFP Board's Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFP<sup>®</sup> professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

Disciplinary information: None

Other business activities: None

Additional compensation: None

Supervised by:

Jesse Anderson, CFA is the Manager and Chief Compliance Officer of the firm and is responsible for the firm's activities. He is responsible for all supervision and monitoring of investment advice offered to clients by Robert Brauer. He can be reached directly at 214-446-8533. He monitors Robert Brauer's work through frequent office interactions as well as remote interactions. He also reviews Robert Brauer's activities through our client relationship management system.

At least once a year, employees are required to review our Policies and Procedures and Code of Ethics manuals. They require that all violations or reportable events be brought to the attention of the Manager for remediation or resolution. If the violation or reportable event involves the Manager, the Chief Financial Officer will act in his place.

This advisor has never been found liable in an arbitration claim, civil, self-regulatory organization, or administrative proceeding involving any of the following:

- (a) An investment or an investment-related business activity
- (b) Fraud, false statement(s), or omissions
- (c) Theft, embezzlement, or other wrongful taking of property
- (d) Bribery, forgery, counterfeiting, or extortion
- (e) Dishonest, unfair, or unethical practices

Additional information about Robert Brauer (CRD#6410140) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).