



**Commandiv LLC**

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**Client Wrap Brochure**

***Inclusive of Appendix 1, Wrap Program***

(Part 2A and 2B of Form ADV)

**January 15, 2018**

This Brochure provides information about the qualifications and business practices of Commandiv LLC (“Commandiv”).

If you have any questions about the content of this Brochure, please contact the Firm at (800) 280-2048 or by emailing: [support@commandiv.com](mailto:support@commandiv.com). 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 Commandiv also is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

Commandiv may refer to itself as a Registered Investment Adviser. Registration does not imply a certain level of skill or training.

## ***ITEM 2 – MATERIAL CHANGES***

No Material changes.

Form ADV 2 is divided into two parts: Part 2A and Part 2B. Part 2A (the “Firm Brochure”) provides information about a variety of topics relating to an investment advisor’s business practices and conflicts of interest. Part 2B (the “Brochure Supplement”) provides information about its advisory personnel.

Commandiv believes that communication and transparency are the foundation of our relationship, and we continually strive to provide our clients with complete and accurate information. We encourage all current and prospective clients to read this Firm Brochure and discuss any questions you may have with us. And of course, we always welcome your feedback.

### ***Future Changes***

From time to time, we may amend this Firm Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Firm Brochure or a Summary of Material Changes shall be provided to each client annually and if a material change occurs in the business practices of Commandiv.

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## ***ITEM 4 – ADVISORY BUSINESS***

### *Ownership / Advisory History*

Commandiv LLC (“We”, “Commandiv”) was founded in November 2016 by John Zettler and Thomas Goldenberg. We are a Delaware limited liability company wholly owned by Commandiv Financial, Inc. We became registered as an investment advisor with the Securities and Exchange Commission in May 2017. We are an internet-based investment advisor that provides software-based portfolio management and investment advisory services via a Wrap Fee Program to clients exclusively through an interactive website (“Website”). Mr. Zettler is our managing member.

### *Services Offered*

We offer individuals a self-directed investment platform that includes an option of using our investment advisory services. When clients open a brokerage account, they have access to a range of investment options that include, but are not limited to, stocks and exchange-traded funds (“ETFs”). Clients may invest their brokerage account’s assets as they see fit. They are able to place trades at any time, just like other self-directed investment services. However, our clients also have access to our investment advisory services for their brokerage accounts through the “Recommendations” section of our software platform.

We have found that many clients of self-directed brokerage platforms tend to invest only a portion of money available in the brokerage account. They also have difficulty discovering and choosing equities, exchange-traded funds, or other products that they believe will accomplish their investment goals. Our advisory services are designed to help the client fully deploy his or her investable assets along the strategies he or she chooses. Clients may choose to use our advisory services for a portion or the entirety of their portfolios.

Separately, we also provide clients the ability to link an existing cryptocurrency account at Coinbase to our software interface. If the client chooses to link his/her Coinbase account, we will display the asset balances in that account and allow the client to send buy and sell orders to Coinbase from our interface via API (application programming interface). We neither provide investment advice on cryptocurrencies nor recommend that clients buy or sell cryptocurrencies. Acting on his or her own discretion, a client can set a target portfolio with targeted allocations for cryptocurrency assets. In that case, we provide rebalancing software that shows the client how to achieve his or her desired cryptocurrency asset allocations.

When a client is ready to use our services, we collect essential information from the client including, but not limited to, his or her age, retirement status, taxable nature of the desired account, and risk tolerance. We use the term “Grit Score” to indicate risk tolerance, which is a 1-7 score based on a questionnaire of investment behavior and goals. Using the collected information, we recommend a “Target Portfolio” for the client’s brokerage account.

At all times the client will maintain control of the brokerage and cryptocurrency accounts and be responsible for placing any trades. We suggest a Target Portfolio for each client's brokerage account and allow the client to modify the strategic allocations of his or her Target Portfolio as the client sees fit. We provide the client with ongoing trade recommendations that intend to move the client's brokerage account closer to the allocations of his or her Target Portfolio.

If a client links a cryptocurrency account at Coinbase, we do not recommend a Target Portfolio on that cryptocurrency account. By default, the "Targets" section of our interface indicates a 100% cash Target Portfolio. The client may decide to build his or her own Target Portfolio of cryptocurrency assets, and may only do so acting on his or her own discretion. If the client does build a cryptocurrency Target Portfolio, then our rebalancing tool will output the trades that will move the client's cryptocurrency holdings closer to his or her stated targets.

Clients have access to the "Website" online 24/7 to check balances, set up trades, initiate transfers, access trade confirmations, statements and tax documents. While our goal is 0% downtime on our Website, this is not always possible due to circumstances beyond our control. Clients should expect that our Website will have interruptions from time to time, but that Commandiv will do its best to restore service as promptly as possible.

## **ITEM 5 – FEES AND COMPENSATION**

We charge an annual management fee, in monthly increments, per the Firm's Wrap Fee program based on all of the client's assets in the brokerage account per the following fee schedule:

	<b>Minimum Account Size</b>	<b>Annual Fee</b>
Client	\$0	0.49%*
Premier Client	\$50,000	0.39%
Quintarian Client	\$500,000	0.29%
Millennium Client	\$1,000,000	0.25%

\* Brokerage accounts have a minimum monthly charge of \$2

All client services and fees are "wrapped" into Commandiv's sponsored Wrap Fee Program. All of Commandiv's clients are participants in the Firm's Wrap Fee Program. Commandiv does not charge additional fees other than those stated directly above.

Clients are not charged on any balances held in a linked cryptocurrency account, because we do not provide advisory services on this type of account. The ability to link a cryptocurrency account to Commandiv is a free software service we offer as a convenience to current clients.

Commandiv offers its core strategies through the Commandiv Wrap Fee Program where it serves as the Program's sponsor and investment adviser. The Program operates exclusively through Commandiv's interactive website. The Program is fee based (see schedule above). Wrap Fee Program fees are not negotiable. Commandiv retains between 50% and 60% of the Program's total fees as its portfolio management fee. Clients do not incur separate brokerage commissions in their brokerage accounts. The basic fee schedule has tapered asset based fees charged monthly in arrears as further described below.

Cash balances and investments in money market funds within the brokerage account are counted toward the account value and are included in the fee calculations. The Wrap Program management fee will be charged in monthly increments, based on the closing brokerage account value of the last calendar day of the month. If the brokerage account has been open for only a partial calendar month, then the fee is pro-rated for the portion of the month it has been open.

While the Wrap Program management fee for a given tier is non-negotiable, we may occasionally upgrade clients to higher client tiers (with their corresponding lower management fees) at our own discretion as the result of certain promotions.

### Fee Billing

Our fee is billed monthly, in *arrears*, meaning that we collect the management fee *after* the one-month billing period has *ended* as outlined in the Commandiv Client Agreement.

We do not charge our fee on unfunded brokerage accounts and our monthly charge will not exceed the brokerage account's closing monthly balance.

### Other Fees

Our Wrap Program fee includes portfolio management and costs of maintaining the account. Our Wrap Program management fee is separate and distinct from other fees or expenses including, but not limited to: non-sufficient funds "NSF" fees, distribution fees, short-term redemption fees, annual custodial carrying fees for IRAs, cryptocurrency trading commissions, transfer and other fees charged by contra firms and other related costs and expenses. Mutual funds and exchange-traded funds also charge internal management fees, as disclosed in a fund's prospectus, which are separate and distinct from our management fee.

### Payment of Fees

Our management fee is deducted directly from client brokerage accounts by Apex Clearing Corporation ("Apex"), the qualified custodian. Apex deducts the fee at the instruction of Commandiv and Third Party Trade LLC ("TPT"), the brokerage account provider. Commandiv does not maintain custody of client assets, as described in "*Item 12 – Brokerage Practices.*"

### Termination of Services

The client may terminate the investment advisory services at any time by notifying us in writing. Client may be charged for the pro-rata portion of any unpaid fees incurred since their last full billing cycle. We only charge for investment services already provided.

## ***ITEM 6 – PERFORMANCE-BASED FEES***

Commandiv does not charge performance-based fees for its investment advisory services. The fees charged by Commandiv are as described in "*Item 5 – Fees and Compensation*" above and are not based upon the capital appreciation of the funds or securities held by any client. Commandiv does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

## ***ITEM 7 – TYPES OF CLIENTS***

Our clients include individuals, high net worth individuals, trusts, and other legal entities (subject to Commandiv's approval) who are U.S. residents.

There is no minimum account size required to maintain a relationship with Commandiv.

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

### ***Methods of Analysis, Investment Strategies and Risk of Loss***

For our software-based financial advice, we use a combination of asset allocation, modern portfolio theory and fundamental analysis. We construct the brokerage Target Portfolio using asset allocation and modern portfolio theory. After the target portfolio is recommended or modified, we use fundamental analysis for ongoing trade suggestions.

Asset allocation is an investment strategy that aims to balance risk and reward by apportioning a portfolio's assets according to an individual's goals, risk tolerance and investment horizon among various asset classes. The asset classes may include equities, fixed-income, real estate, and cash and equivalents. The risk associated with asset allocation is that each class has different levels of risk and return, so each will behave differently over time.

Modern Portfolio Theory is a theory on how risk-averse investors can construct portfolios to optimize or maximize expected return based on a given level of market risk, emphasizing that risk is an inherent part of higher reward. According to the theory, it's possible to construct an "efficient frontier" of optimal portfolios offering the maximum possible expected return for a given level of risk. Based on statistical measures such as variance and correlation, an individual investment's return is less important than how the investment behaves in the context of the entire portfolio.

Fundamental analysis is a technique that attempts to determine a security's value by focusing on the underlying business(es) or a fund's expenses and structure. The analysis is performed on historical and present data. On a broader scope, one can perform fundamental analysis on industries or the economy as a whole. The term refers to an analysis of the economic characteristics of a financial entity as opposed to only its price movements. The risk associated with fundamental analysis is that despite positive economic characteristics, it may not rise in value as predicted.

### ***Investment Risks***

All investment programs have certain risks that are borne by the client and **investing in securities involves risk of loss that clients should be prepared to bear**. Our goal is to reduce the risk of loss, but not at the expense of portfolio growth. The Target Portfolios we recommend are intended to be passively managed, meaning that the client does not engage in market timing, or trading

based upon news or events. To manage risk, we recommend clients rebalance their portfolios with our trade recommendations on at least a quarterly basis to bring the asset allocations of their account closer to those of their Target Portfolio. We do not trade the client's account. The client is responsible for all trading activity in the account including rebalancing.

### Recommended Securities

We recommend the use of exchange-traded funds to achieve the asset allocations of clients' Target Portfolios. A client should expect his or her account value and returns to fluctuate within a wide range, like the fluctuations of the overall stock and bond markets. Each portfolio's performance is subject to the following risks:

- **Credit risk:** This is the risk that an issuer of a bond could suffer an adverse change in financial condition that results in a payment default, security downgrade, or inability to meet a financial obligation.
- **Inflation risk:** This is the risk that inflation will undermine the performance of an investment and/or the future purchasing power of a client's assets.
- **Interest rate risk:** The chance that bond prices overall will decline because of rising interest rates.
- **International investing risk:** Investing in the securities of non-U.S. companies involves special risks not typically associated with investing in U.S. companies. Foreign securities tend to be more volatile and less liquid than investments in U.S. securities, and may lose value because of adverse political, social or economic developments overseas or due to changes in the exchange rates between foreign currencies and the U.S. Dollar. In addition, foreign investments are subject to settlement practices, as well as regulatory and financial reporting standards, that differ from those of the U.S.
- **Manager risk:** The chance that the proportions allocated to the various securities will cause the client's account to underperform relevant to benchmarks or other accounts with a similar investment objective.
- **Stock market risk:** The chance that stock prices overall will decline. Stock markets tend to move in cycles, with periods of rising stock prices and periods of falling stock prices.

### Cryptocurrencies

Although we do not recommend cryptocurrencies or provide investment advice on cryptocurrencies as part of our offering, we would like to remind all clients of the risks associated with owning cryptocurrencies. Clients who choose to invest in cryptocurrencies are subject to additional risks to those detailed above.

Cryptocurrency prices have significantly more volatility than securities prices; they have a limited history for analysis; and they are not subject to the same level of the regulatory oversight as other asset classes. The risk of loss for cryptocurrencies may be larger than the risk of loss with securities. Cryptocurrency investments involve a high degree of risk and are not appropriate investments for all investors. We caution all clients to think critically about the risks associated, and consider if those risks are suitable for the client.

### ***ITEM 9 – DISCIPLINARY INFORMATION***

None; neither Commandiv, nor its Officers or Principals have ever been subject to any disciplinary events or occurrences by any regulatory authority.

### ***ITEM 10 – OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS***

Commandiv is independent. Currently, Commandiv does not have any affiliated entities that are engaged in financial services or related businesses.

Currently, no members of the Advisor are also registered representatives or associated person of a registered broker-dealer or member FINRA firm.

Commandiv's Chief Compliance Officer, is associated with FINRA as an Arbitrator and is CCO of an unaffiliated institutional RIA.

### ***ITEM 11 – CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING***

#### ***Code of Ethics***

Commandiv has established and approved a Code of Ethics that sets forth standards of ethical business conduct for employees and is designed to address and avoid potential conflicts of interest. Among other things, the Code of Ethics prescribes standards for dealing with clients ethically, addresses actual and potential conflicts of interests, and supplements existing personal trading and operating procedures. The Code of Ethics provides guidance in specific areas, including but not limited to, confidentiality of Firm information, personal investments, gifts and entertainment and personal political activities. This Code of Ethics is available to clients or prospective clients by writing to Commandiv at the address listed on the front of this Brochure.

### Participation or Interest in Client Transactions & Personal Trading

Employees and related persons of the Advisor may trade and hold a material financial interest in a security that Commandiv recommends to clients, only so long as that security is a passively-managed, index-tracking investment fund. Commandiv only recommends passive, index-tracking exchange-traded funds as components of a recommended target allocation. As such, it is possible that a related person of the Advisor trades or owns a financial interest in a security that Commandiv recommends to clients.

Clients have the ability to add any stock or other investment to their Target Portfolio. They do so in a self-directed capacity. These investments have not been recommended by Commandiv, and as such, they are not restricted investments to related persons of the Advisor.

Commandiv notes that in efficient U.S. markets, passively-managed, index-tracking investment funds are valued equally to the value of their component securities. As such, the Advisor believes no material conflict-of-interest exists if its employees or related persons also use the Commandiv software, or otherwise invest in Commandiv-recommended ETFs. Further, since each client trades and rebalances on his or her own discretion and timeline, we believe no material conflict-of-interest exists in the form of front-running client trades.

The Advisor does not engage in "Proprietary Trading," or trading securities for its own benefit.

### **ITEM 12 – BROKERAGE PRACTICES**

Commandiv does not maintain custody of your assets that we manage. Your brokerage assets must be maintained in a brokerage account at a "qualified custodian," broker-dealer. We primarily use TPT as the broker-dealer for our advisory brokerage accounts. TPT is an introducing broker to Apex Clearing Corporation, who will maintain custody of client brokerage assets and execute client trades. We are independently owned and operated and not affiliated with any qualified custodian. The qualified custodian will hold your brokerage assets in a brokerage account, and buy and sell securities when instructed by either us or you.

Commandiv does not direct orders to certain broker-dealers/custodians in return for research or other benefits. Other than trade execution itself, Commandiv does not receive research, or other products or services, from a broker-dealer/custodian or a third party in connection with your securities transactions - a practice referred to as "soft-dollar benefits".

Commandiv seeks to select a broker-dealer/custodian who will hold your assets and execute transactions on terms that are overall most advantageous when compared to other available providers and their services. We consider a wide range of factors, including, among others: the capability to execute, clear and settle trades; breadth of investment products made available (e.g.,

stocks, bonds, mutual funds, ETFs, options); quality of services; and competitiveness of the price of those services and willingness to negotiate them.

Commandiv routinely recommends that clients open brokerage accounts with TPT. With this recommendation, Commandiv is recommending that clients custody their brokerage assets at Apex Clearing Corporation, because this is the “qualified custodian” used by TPT. TPT is our recommended broker for clients because of their effective trade execution platform, which may benefit you. We do not receive compensation from Third Party Trade for directed trades. That would create a conflict of interest with you.

Clients trade their own accounts at their own discretion. Because of this, Commandiv does not aggregate trades.

### ***ITEM 13 – REVIEW OF ACCOUNTS***

#### ***Oversight and Monitoring: Periodic Reviews***

Commandiv reviews its recommended securities and recommended Target Portfolios at least annually. This review is conducted by the Investment Committee, which is currently composed of John Zettler solely.

Recommended Target Portfolios for brokerage accounts dynamically adjust as a client ages and when a client updates his or her financial information through the Website.

Conditions that may trigger an unplanned review are changes in the tax laws, new investment information, and highly-volatile market movements.

#### ***Reports to Clients***

Clients of Commandiv will receive account statements from the qualified custodian, typically via email, usually monthly and at least quarterly.

### ***ITEM 14 – CLIENT REFERRALS AND OTHER COMPENSATION***

The only compensation that Commandiv receives is the asset management fee we charge you. Commandiv does not receive any economic benefit from anyone who provides investment advice or other advisory services to you.

Commandiv may, as a customer service gesture, waive all or part of future management fees charged to either a current client and/or a potential client.

## ***ITEM 15 – CUSTODY***

Commandiv does not have custody of client funds or securities, nor does the firm prepare statements. The firm utilizes the services of Third Party Trade LLC (Member FINRA and SIPC) to operate our clients' brokerage accounts. Third Party Trade LLC is an introducing broker to Apex Clearing Corporation (Member FINRA and SIPC), which holds securities and credit balances and executes trades for clients. Statements are provided to clients from Apex Clearing Corporation usually monthly, but not less frequently than quarterly. These statements will be co-branded between Commandiv and Third Party Trade LLC.

Online statements for the previous month-end are generally available by the first business day of the following month and may be accessed by visiting <https://app.commandiv.com/reports>.

Clients should review statements carefully and report any discrepancies to Commandiv immediately.

## ***ITEM 16 – INVESTMENT DISCRETION***

Commandiv does not currently accept discretionary authority.

## ***ITEM 17 – VOTING CLIENT SECURITIES***

Commandiv does not have authority to vote proxies on behalf of advisory clients. Clients retain responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. Commandiv may provide advice regarding the clients' voting of proxies

## ***ITEM 18 – FINANCIAL INFORMATION***

Not applicable.

## ***PRIVACY POLICY***

Commandiv is committed to protecting the confidentiality of information clients send to us. Regulation S-P adopted by the SEC requires that we provide the following information to you.

To view Commandiv's complete privacy policy, you may find it on our Website here:  
<https://www.commandiv.com/privacy>.

## **FORM ADV PART 2B BROCHURE SUPPLEMENT**

### **John Zettler**

#### **Item 1: Form ADV Part 2B Group Brochure Supplement**

This Brochure Supplement provides information about the following IA associated person:

- John Zettler

Additional information about Commandiv's associated persons is available on the SEC's website at: [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

#### **Item 2: Educational Background and Business Experience**

##### ***Business Background***

- Chief Executive Officer, Commandiv Financial, Inc.
- Investment Analyst, SeaStone Capital Management, LP
- Investment Banking Analyst, Morgan Stanley

##### ***Investment Industry Experience***

- Initially registered with FINRA in August 2011 (CRD number 5937541)
- Licenses awarded, Series 79, 65
- Investment analyst for hedge fund with institutional clients

##### ***Educational Background***

- Graduated 2011 BS in Commerce (Finance), with 2<sup>nd</sup> major in Spanish, University of Virginia

#### **Item 3: Disciplinary Information**

Does not have any disclosure items.

#### **Item 4: Other Business Activities**

Does not have any disclosure items.

Item 5: Additional Compensation

Mr. Zettler does not receive any additional economic benefit from third parties for providing advisory services.

Item 6: Supervision

Mr. Zettler is supervised by Thomas Goldenberg, Chief Technology Officer in accordance with the firm's Code of Ethics.

**Thomas Goldenberg**

Item 1: Form ADV Part 2B Group Brochure Supplement

This Brochure Supplement provides information about the following IA associated person:

- Thomas Goldenberg

Additional information about Commandiv's associated persons is available on the SEC's website at: [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

Item 2: Educational Background and Business Experience

*Business Background*

- Chief Technology Officer, Commandiv Financial, Inc.
- Lead Software Engineer, Agolo
- Mobile and Web Engineer, Agolo
- Software Consultant, Sous, Nudger, Brainscape
- CEO and Founder, CLG Solutions LLC

*Investment Industry Experience*

- The company that Mr. Goldenberg previously worked for (Agolo) provided analytics software for several hedge funds and banks, including Citibank, Point72, and Bank of America.

#### *Educational Background*

- Graduated 2012 BA, S.U.N.Y. Empire State College

#### *Item 3: Disciplinary Information*

Does not have any disclosure items.

#### *Item 4: Other Business Activities*

Mr. Goldenberg is the CEO and Founder of CLG Solutions LLC, which provides software consulting and produces and sells educational software. This is a non-investment-related business activity.

#### *Item 5: Additional Compensation*

Mr. Goldenberg does not receive any additional economic benefit from third parties for providing advisory services.

#### *Item 6: Supervision*

Mr. Goldenberg is supervised by John Zettler, Chief Executive Officer in accordance with the firm's Code of Ethics.

### ***Justin Drobenaire***

#### *Item 1: Form ADV Part 2B Group Brochure Supplement*

This Brochure Supplement provides information about the following IA associated person.

- Justin Drobenaire

Additional information about Commandiv's associated persons is available on the SEC's website at: [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

*Item 2: Educational Background and Business Experience*

*Business Background*

- Chief Compliance Officer, Commandiv LLC
- Arbitrator, Industry Panel, FINRA
- Chief Compliance Officer, Falcon Bridge Capital, RIA
- GM, US Treasury Department

*Investment Industry Experience*

- Continually registered with FINRA since 1987 (CRD number 1569191)
- Licenses awarded, Series 7, 8 (9/10) 24, 63, 65, 79, 99
- CCO of several SEC registered RIA's and FINRA member firms.

*Educational Background*

- Graduated 1986 MPA in Organizational Management, University of San Francisco

*Item 3: Disciplinary Information*

Does not have any disclosure items.

*Item 4: Other Business Activities*

- Arbitrator, FINRA
- Managing Member of consulting firm Hillforest, LLC
- CCO, Falcon Bridge Capital, RIA

Item 5: Additional Compensation

Mr. Drobenaire does not receive any additional economic benefit from third parties for providing advisory services.

Item 6: Supervision

Justin Drobenaire is supervised by John Zettler, Chief Executive Officer in accordance with the firm's Code of Ethics.