

Part 2A of Form ADV: Firm Brochure



SELECT ALTERNATIVE INVESTMENTS, INC.

37 Hillside Lane
New Hope, PA 18938

This brochure provides information about the qualifications and business practices of Select Alternative Investments LLC. If you have any questions about the contents of this brochure, please contact us at 860-305-9695 and/or Kevin@SelectAlts.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 Select Alternative Investments, Inc. also is available on the SEC's website at www.adviserinfo.sec.gov.

Select Alternative Investment, Inc.'s registration as an investment adviser does not imply a certain level of skill or training.

Effective Date: March 29, 2018

Material Changes

Last Annual Update: Not applicable.

Summary of Material Changes

This section will be updated as required in the event any material changes are made to the Select Alternative Investments, Inc. Firm Brochure (the “Brochure”):

- Select Alternative Investments, Inc. is a new investment advisory firm, so there are no material changes to report at this time.

Delivery Requirements

We will provide a summary of any material changes to this Brochure to our clients at least annually, within 120 days of our fiscal year end. Furthermore, we will provide our clients with other interim disclosures about material changes as necessary.

A complete copy of our current Form ADV Part 2A and/or 2B may be requested free of charge by contacting via phone at 860-305-9695 or via email at Kevin@SelectAlts.com.

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Advisory Business

FIRM DESCRIPTION

Select Alternative Investments LLC (“SelectAlts”, “we”, “us”, or “our firm”) is a Pennsylvania Limited Liability Company and has been in business as a registered investment adviser since 2018. The principal owner of the firm is Kevin Means, Founder and Chief Investment Officer.

As a registered investment adviser, we are a fiduciary to you, our client, meaning we have a fundamental obligation to act in your best interest. Should any material conflicts of interest exist that might affect the impartiality of our investment advice, they will be disclosed to you in this Brochure. We urge you to review this Brochure carefully and consider our qualifications, business practices and the nature of our advisory services before becoming our client. If at any time, additional material conflicts of interest develop, SelectAlts will provide our clients with written notification of those material conflicts of interest or an updated Brochure.

As of December 31, 2017, SelectAlts manages \$4.2 million of client assets on a discretionary basis. We do not manage any client assets on a non-discretionary basis.

ADVISORY PROGRAMS

SelectAlts manages client portfolios which typically consist of exchange traded funds (ETFs) and individual stocks but which may also include other securities including but not limited to mutual funds, bonds, options and futures, and foreign currencies. We specialize in managing liquid alternatives portfolios, with an emphasis on low-cost alternative ETFs. We offer three types of portfolios:

1. Global Macro Portfolios - Designed for investors who desire a diversified absolute return investment and are willing to use shorting and leverage in an attempt to achieve a more attractive return/risk performance result.
2. Multi-Strategy Portfolios - Designed for investors who desire a diversified absolute return investment with no shorting or leverage.
3. Custom Core Portfolios - Designed for investors who desire a customized portfolio of “core” stock and bond market investments (to complement our alternative portfolios) tailored to their return objectives and risk preferences.

SelectAlts enters into formal written agreements with our clients setting forth the terms and conditions under which we will provide our advisory services (the “Engagement Agreement”). The Engagement Agreement sets forth the scope of the services to be provided and the compensation we receive from the client for such services, and specifies one or more of the above portfolios that will be used to manage the client’s assets.

Important Note: It is the client’s responsibility to ensure that SelectAlts is promptly notified if there are ever any significant changes to their financial situation, goals, objectives or needs so we can review our previous recommendations and make any necessary adjustments.

Fees and Compensation

ADVISORY FEES

The following information describes how SelectAlts is compensated for the advisory services we provide to our clients. The specific manner in which fees are charged and the compensation we receive may differ among clients depending upon the individual Engagement Agreement with each client. SelectAlts reserves the right to negotiate our compensation with clients depending on the scope of our advisory relationship, and we may charge higher or lower fees than are available from other firms for comparable services.

Fee Schedule. SelectAlts reserves the right to negotiate fees on a case by case basis. However, we generally adhere to the following fee schedule. SelectAlts’ two absolute return portfolios, Multi-Strategy Portfolio and Global Macro Portfolio, are designed to compete with absolute return-style hedge funds, which typically charge an asset-based fee of 2% and a performance-based fee of 20% of profits. Our intention in fixing our fees is to be much less expensive than most hedge funds. Typically, a “qualified client” (defined below) will be offered a choice between the following asset-based fee schedule (with no performance-based fee) or an agreed upon performance-based fee (with no asset-based fee). Clients who are not qualified clients are limited to only the asset-based fee. Our Custom Core Portfolios use only an asset-based fee. Our asset-based fee schedule is as follows:

Global Macro Portfolios

- 1.50% on the first \$2,000,000 of assets under management
- 1.00% on assets between \$2,000,000 and \$5,000,000
- 0.75% on assets between \$5,000,000 and \$10,000,000
- 0.50% on assets over \$10,000,000

Multi-Strategy Portfolios

- 1.00% on the first \$2,000,000 of assets under management
- 0.75% on assets between \$2,000,000 and \$5,000,000
- 0.625% on assets between \$5,000,000 and \$10,000,000
- 0.50% on assets over \$10,000,000

Custom Core Portfolios

- 0.50% on the first \$2,000,000 of assets under management
- 0.375% on assets between \$2,000,000 and \$5,000,000

- 0.30% on assets between \$5,000,000 and \$10,000,000
- 0.25% on assets over \$10,000,000

Performance-based fees, if selected by a qualified client, are negotiated separately and replace the above asset-based fee. Typically, performance-based fees are paid quarterly, in arrears, based upon a percentage of the total profits for the quarter. A “high water mark” is used, which means that a performance-based fee will be assessed only to the extent that prior losses have been recovered. If a qualified client chooses to only have a performance-based fee (and no asset-based fee), our schedule is as follows:

Global Macro Portfolios

- 20% of profits on the first \$2,000,000 of assets under management
- 13.33% of profits on assets between \$2,000,000 and \$5,000,000
- 10% of profits on assets between \$5,000,000 and \$10,000,000
- 7.5% of profits on assets over \$10,000,000

Multi-Strategy Portfolios

- 20% of profits on the first \$2,000,000 of assets under management
- 15% of profits on assets between \$2,000,000 and \$5,000,000
- 12.5% of profits on assets between \$5,000,000 and \$10,000,000
- 10% of profits on assets over \$10,000,000

Fee Payment Terms. Asset-based investment advisory fees are either deducted daily from client accounts, or deducted from client accounts quarterly in arrears, depending on the client’s preferences and the custodian selected by the client. Asset-based fees that are paid quarterly in arrears (rather than daily) are calculated based on the market value of each client account as of the last day of the quarter.

Most SelectAlts clients elect to use Interactive Brokers’ automatic advisor fee billing functionality, through which the client authorizes Interactive Brokers in writing to automatically deduct a certain amount of fees from their account(s) and remit the fees to us. Clients specify the method by which our fees will be calculated as well as the timing of the deductions (i.e., daily, monthly, quarterly, etc.). This request may be made in the client’s account application to Interactive Brokers or at any time after that, and the client may change his billing instructions to Interactive Brokers at any time. Once this written request from the client is processed, Interactive Brokers will calculate the fees according to the method specified by the client. Our firm does not have the authority to request that Interactive Brokers withdraw any fees from the client’s accounts or make any adjustments to clients’ predetermined fee calculation method (other than to reduce the fee). Clients can either specify a calculation method (i.e., percent of AUM, flat fee, percentage of positive P&L,) or they can authorize Interactive Brokers to pay us fees up to a certain amount each month (or quarter) and process any invoices we submit for up to that amount. Any advisory fees deducted from the client’s account(s) will be reflected on account statements sent by Interactive Brokers.

Performance-based fees are paid at the end of the evaluation period, typically at the end of a calendar quarter. Fee collection arrangements for institutional clients are subject to negotiation and may involve other arrangements, such as separate invoicing.

Additional Fees and Expenses. Clients will incur transaction charges and/or brokerage fees when purchasing or selling securities. These charges and fees are typically imposed by the broker-dealer or qualified custodian through which account transactions are executed. For more information on our brokerage practices, please refer to the “Brokerage Practices” section of this Brochure.

The fees that clients pay to our firm for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds and/or exchange traded funds (described in each fund’s prospectus) to their shareholders. The fees charged directly by mutual funds and exchange traded funds will typically include a management fee and other fund expenses.

To fully understand the total costs associated with their investment portfolio, clients should review all the fees charged by mutual funds, exchange traded funds, our firm and others.

Termination. The Engagement Agreement with our clients may be terminated by either party at any time upon thirty (30) days written notice. Upon termination of our status as the client’s investment adviser, SelectAlts will not take any further action with respect to the client’s account(s) unless specifically notified by the client in writing. Clients will be responsible for instructing their custodian and monitoring their account for the final disposition of assets.

Final Pro-Rata Fee. Upon receipt of a proper notice of termination from the client, as described in the Engagement Agreement, any earned unpaid fees will be billed on a pro-rata basis based on the amount of work performed by us up to the point of termination.

Brokerage Commissions. SelectAlts does not receive brokerage commissions from the sale of securities or other investment products. Our compensation for recommending securities and investment products is limited to the advisory fees described above.

Taxes. The primary purpose of our portfolios is to achieve an attractive level of return for a given level of risk. Tax consequences will be a secondary consideration for clients with taxable accounts. Particularly in our Global Macro Portfolios, which utilize both long and short positions and generally experience a high rate of turnover, most of our capital gains are likely to be short-term in nature, which are currently taxed at ordinary income tax rates.

Although many ETFs are registered under the Investment Company Act of 1940, as amended (the “Investment Company Act”), as are traditional mutual funds, some ETFs, in particular those that invest solely in commodities and currencies, are not registered as investment companies under the Investment Company Act. These types of ETFs may be formed as limited partnerships or grantor trusts and may have unique tax consequences. The tax reports and information with respect to holdings of this type may include Form 1099s, Schedule K-1s and/or other

Information, such as grantor trust tax reporting statements.

For clients that utilize stock lending to gain some extra return from their holdings, there is a risk that dividend income that would otherwise be “qualified” and subject to a reduced tax rate may be received instead as ordinary income taxed at ordinary rates.

IRA accounts are not allowed to use margin, but to the extent that other tax-exempt investors, such as tax qualified pension and profit-sharing plans, elect to use leverage in their accounts, they may generate “unrelated business taxable income” which may require them to file a federal income tax return and result in incurring income taxes on such income to the extent of leverage employed. For this reason, we generally advise plan sponsors to invest only in the SelectAlts portfolios that do not use leverage.

Performance-Based Fees and Side-By-Side Management

PERFORMANCE BASED FEES

SelectAlts may enter into performance-based fee arrangements with “qualified clients” (clients having a net worth (excluding the equity value of their primary residence) greater than \$2,100,000 or for whom we manage at least \$1,000,000.

SIDE-BY-SIDE MANAGEMENT

“Side-by-side management” refers to the simultaneous management of multiple types of client accounts. SelectAlts may be responsible for the management of performance-based fee accounts and the management of accounts with asset-based fee arrangements. This creates a potential conflict of interest since we may have an incentive to favor accounts for which we receive performance-based fees over other accounts in the allocation of investment opportunities. SelectAlts has adopted procedures to ensure that clients are treated fairly and equally and to prevent this conflict from influencing the allocation of investment opportunities among clients.

Types of Clients

TYPES OF CLIENTS

SelectAlts offers investment advisory services to a diversified group of clients including individuals, high net worth individuals, trusts, estates, banking or thrift institutions, investment companies (including mutual funds), investment advisers, pension and profit sharing plans (other than plan participants), charitable organizations, corporations and other business entities, insurance companies, state and municipal government entities, non-profit

organizations, wrap programs and managed investment pools (e.g. hedge funds). Client relationships may vary in scope and length of service.

ACCOUNT REQUIREMENTS

SelectAlts generally requires a minimum account balance of \$500,000 for our investment management services. However, SelectAlts in its sole discretion may waive or lower our minimum account balance requirement based on various criteria (i.e., anticipated future additional assets to be managed, related accounts, account composition, negotiations with the client, etc.).

Methods of Analysis, Investment Strategies and Risk of Loss

METHODS OF ANALYSIS

SelectAlts specializes in the management of absolute return portfolios that primarily invest in a diversified mix of exchange traded funds (“ETFs”), with an emphasis on funds that invest in alternative assets. These ETFs invest in a variety of assets and strategies, including (but not limited to):

- long/short equities
- commodities
- currencies
- high yield bonds
- merger arbitrage
- factor-based equities
- country-based equities
- hedge fund replication
- emerging market bonds
- inflation-linked bonds
- real estate equities
- equity market volatility
- publicly traded venture capital
- sector and industry-based equities
- IPO and spinoff equities
- buyback equities

The investment objective of all SelectAlts portfolios is to provide an attractive level of absolute return for the level of risk assumed. The targeted absolute risk levels for our portfolios vary but tend to fall somewhere between the risk of a bond portfolio and the risk of a stock portfolio.

We forecast investment returns based upon a combination of value, momentum, and sentiment, using sophisticated quantitative models. Although we believe that markets tend toward efficiency, we specifically seek to exploit market inefficiencies when we can find them. In our global macro and multi-strategy portfolios we seek to harvest alternative sources of return that are uncorrelated to core stock and bond risks. In our custom core portfolios, we seek to strategically and tactically allocate assets to take advantage of the most attractive return/risk opportunities available.

Risk control is of paramount importance to us. First and foremost, we measure, forecast, and manage four primary sources of risk in our portfolios:

- Stock market risk, as measured by the S&P 500 Index
- Interest rate risk, as measured by the 10 Year Treasury Benchmark Index
- Currency risk, as measured by the U.S. Dollar Index
- Commodity risk, as measured by the West Texas Intermediate Crude Oil Index

In addition, we limit exposures to countries, sectors, industries, and other common factor risks.

Finally, stock-specific risk is largely diversified away through the use of funds, although we allow for limited positions in individual stocks.

We do not currently utilize options or futures, but we may add them to our portfolios in the future.

The securities analysis methods employed by SelectAlts include fundamental analysis, technical analysis, and economic analysis. Our main sources of information include financial databases, newspapers and magazines, research materials prepared by others, corporate rating services, annual reports, prospectuses, filings with the SEC, and company press releases.

Our 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.

INVESTMENT STRATEGIES

SelectAlts specializes in managing liquid alternatives portfolios, with an emphasis on low-cost ETFs. Portfolio management clients typically select a strategy based upon one or more of SelectAlts' model portfolios. We offer three types of portfolios:

1. **Global Macro Portfolios** - Designed for investors who desire a diversified absolute return investment and are willing to use shorting and leverage in an attempt to achieve a more attractive return/risk performance result.
 - Long and short positions to reduce market correlation
 - Leverage of up to 250% of capital to enhance return
 - High emphasis on diversification of core stock and bond risks
2. **Multi-Strategy Portfolios** - Designed for investors who desire a diversified absolute return investment with no shorting or leverage.
 - Long-only positions
 - No leverage

- Moderate emphasis on diversification of core stock and bond risks
 - Qualifies for IRA accounts
3. **Custom Core Portfolios** - Designed for investors who desire a customized portfolio of “core” stock and bond market investments (to complement our alternative portfolios) tailored to their objectives and preferences.
- Long-only positions
 - No leverage
 - Emphasis on harvesting return from core stock and bond risks

MATERIAL RISKS THAT APPLY TO ALL SELECTALTS PORTFOLIOS

Risk of Loss. Any investment carries a certain degree of risk, including a possible loss of principal that clients should be prepared to bear. The value of securities used in all of our strategies may go up or down in response to factors not within our control, such as but not limited to the status of an individual company underlying a security, or the general economic climate. There is no guarantee that any of the investment strategies that our firm employs will outperform the investment strategies used by other firms. Past performance is no guarantee of future results.

Model Risk. Our quantitative models are dependent upon both the validity of our investment theories and the soundness of our research methodologies. Investment markets are extremely competitive and any investment opportunities that we identify are likely to be either highly uncertain or very short-lived. We believe that the return forecasting techniques that we use are based upon permanent human behavioral phenomena. However, the fact that research into these behavioral effects has gained wide acceptance in recent years may lead to a weakening of these effects in the future. Furthermore, because quantitative research tends to be complex, detailed, and intricate, the risk of error is extremely large. Although we carefully review our data and results, drawing upon many years of experience in quantitative research and portfolio management, some errors may slip past us. One or more of such errors could adversely affect a client’s portfolio.

Market-related Risks. Portfolios managed by SelectAlts involve general market risks, such as sensitivity to changes in the equity market, the bond market, the currency market, and the commodity market. We attempt to monitor and manage these risks, but we may be wrong in our expectations and forecasts and client portfolios may suffer losses as a result.

Security-Specific Risk. Although most of the securities in client portfolios are themselves fund portfolios, usually with many individual holdings, each fund is selected based upon its specific index or strategy, giving all of the holdings in that fund common characteristics. If the underlying index or strategy of the fund suffers an unexpectedly large loss, the client’s portfolio will be adversely affected.

Index Tracking Risk. Most positions in SelectAlts portfolios are ETFs or ETNs that purport to track a specific index. We base much of our analysis on the historical characteristics of the underlying index. Therefore, it is important that the performance of the funds in which we invest closely track the performance of their underlying indexes. Although we attempt to monitor how closely a fund tracks its underlying index, there is a risk that a fund will unexpectedly underperform its index.

Exchange Traded Products Risk. Exchange traded funds (“ETFs”) and exchange traded notes (“ETNs”), together commonly called exchange traded products (“ETPs”), typically trade on securities exchanges and their shares may, at times, trade at a premium or discount to their net asset values (the value of the underlying assets in the portfolio). ETPs charge management fees and other expenses, and such costs are in addition to SelectAlts’ fee. To the extent SelectAlts portfolios invest in ETPs that focus on a particular asset class, market sector or industry or country, the portfolios will also be subject to the risks associated with investing in those classes, sectors, industries or countries, including concentration risk. As purchasers of ETP shares on the secondary market, the SelectAlts portfolios will be subject to the market risk associated with owning any security whose value is based on market price.

Exchange Traded Notes Risk. Unlike ETFs, ETNs do not hold portfolios of securities. Rather, they are “notes” or agreements with the issuing party to pay or receive payment based upon the movement of an index. As such, owning ETNs involves counterparty credit risk. We will monitor the creditworthiness of any counterparties to which we are exposed, but we cannot be sure that a counterparty will not default and that a portfolio will not sustain a loss on a transaction as a result.

Hedging Transactions. SelectAlts may, from time to time, employ various hedging techniques to attempt to reduce the risk of portfolio exposures. Our hedging techniques may not always be effective in limiting losses. If we analyze market conditions incorrectly or employ a strategy that does not correlate well with our portfolios’ investments, the hedging techniques could result in a loss.

Leveraged and Inverse ETPs. Certain ETPs use derivatives to achieve a target daily return relative to an index. For example, an ETP may provide 2X (two times) the daily return of the S&P 500. Typically, these ETPs reset their exposure to the index daily, and their prospectuses indicate that they are designed for short-term traders rather than long-term investors. If held for more than a single day, leveraged and inverse ETPs may behave in unexpected ways. Position sizes may compound and become larger than intended if returns are strongly in one direction. Alternatively, if returns reverse on a daily basis, the daily resets can result in unexpected losses, known as “volatility drag.” A 2X ETP held for a multi-day period is very unlikely to achieve twice the return of the reference index over that holding period. It could be more, but it is more likely to be less because of volatility drag. Adjusting the amounts invested in leveraged ETPs can reduce these effects only modestly.

Turnover and Transaction Costs. SelectAlts portfolios are actively managed. Holding periods and portfolio turnover may vary significantly from time to time, but turnover may be expected to exceed 100% annually for the most actively managed portfolios. Some of the securities in which we invest may be thinly traded, and transactions in these securities may result in heavy transaction costs due to wide bid-ask spreads. While we will attempt to limit transaction costs, and will engage in transactions only when we believe the potential return enhancement and/or risk reduction will justify the transaction costs involved, we cannot guarantee that our judgments will prove correct.

Limited Liquidity. We monitor the liquidity of securities in making decisions regarding client investments. However, we may decide to invest in securities which generally have a relatively low trading volume. We may not be able to dispose of such securities at the most favorable price if there is limited demand when we wish to sell them.

Margin Accounts. We generally recommend that our clients open a “margin account” with the custodian/broker. (As opposed to a “cash account,” a margin account allows for some leverage in the account.) This applies even to those clients who do not want any leverage, or margin, in their portfolios. This is because margin accounts give us greater trading flexibility because we are able to simultaneously sell one security and purchase another to replace it in the portfolio, rather than having to wait for the sale to settle before making the purchase. A margin account gives the custodian/broker a greater degree of control over a client account. For example, if the equity in a client account falls below the maintenance margin requirements under the law, or the broker's higher “house” requirements, the broker can exit positions in any of the client’s accounts held at the firm to cover the margin deficiency. Of course, the fact that a client account allows the client to use margin does not require that the client use it. For our clients who do not wish to use margin or leverage in their accounts, we endeavor to avoid any use of margin or leverage, even in a margin account.

Limited Operating History. SelectAlts has limited history upon which basis potential clients may evaluate its performance. Any past investment performance by Mr. Means is no assurance of future results.

Dependence on the Principal. The success of a client’s account critically depends upon the skills, judgment and efforts of Mr. Means. Any loss of services from Mr. Means could have a material adverse effect upon a client.

MATERIAL RISKS THAT APPLY TO ONLY CERTAIN SELECTALTS PORTFOLIOS

Performance-based Fees. Some clients may decide to compensate us with a performance-based fee. Although this type of arrangement has largely become a customary standard for private investment partnerships (hedge funds), it can be characterized as creating an incentive to SelectAlts for speculative investment and thus a potential conflict with the interests of the client.

Leverage. Certain SelectAlts portfolios utilize leverage. Leverage involves the use of borrowed funds to increase the amount of invested capital in a portfolio's positions. Even in our most aggressively managed client portfolios, our policy is to limit the leverage ratio (value of total assets to equity capital) to a maximum of three to one. The use of leverage may amplify both gains and losses roughly in proportion to the amount of leverage employed. For example, at the maximum leverage ratio of three to one, a 10% loss in portfolio value will result in a 30% loss of the client's equity capital.

Short Selling. Short selling will be employed in some SelectAlts portfolios. Selling securities short involves selling securities that were not previously purchased. In order to make delivery to the buyer, the client's account must borrow securities from a third-party lender, which entails additional expense since the lender will charge fees for stock lending. Securities sold short must be bought later in order to close out the short position. Because there is no limit as to how a high security's price may climb, short selling involves a potential risk of loss greater than the initial investment. There is also a risk that the securities borrowed in connection with a short sale might need to be returned to the securities lender on short notice, and if no other borrowing source can be found, the security would have to be purchased, possibly at a disadvantageous price.

Options. Some SelectAlts portfolios may invest in options, which is a highly specialized activity and entails greater than ordinary investment risks. Trading put and call options can result in large amounts of leverage because option premiums paid or received by an investor are small in relation to the market value of the investments underlying the options. As a result, the leverage offered by trading in options could cause an investor's asset value to be subject to more frequent and wider fluctuations than would be the case if the investor did not invest in options. Buying options limits an investor's risk to the premium paid but selling so-called "naked" or uncovered options involves much greater risk of a potentially unlimited amount.

Futures. Some SelectAlts portfolios may invest in futures. Transactions in futures carry a high degree of risk. The amount of initial margin is small relative to the value of the futures contract, meaning that transactions are heavily "leveraged" or "geared." A relatively small market movement will have a proportionately larger impact on a client's portfolio and this may work against the client.

Disciplinary Information

REQUIRED DISCLOSURES

Our firm and our management persons have not been involved in any legal or disciplinary events that would have a material adverse effect on the integrity of our management or the services we provide to our clients.

Other Financial Industry Activities and Affiliations

OUTSIDE BUSINESS ACTIVITIES

Neither SelectAlts nor any of its employees are registered, or have an application pending to register, as a broker-dealer or registered representative of a broker dealer, futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.

SelectAlts also provides tax preparation and tax planning services. Fees for such services are negotiated on a case by case basis and are not part of the portfolio management fee.

AFFILIATED ENTITIES

SelectAlts has no relationships or arrangements with any affiliated entities.

CONFLICTS OF INTEREST

SelectAlts does not have any business relationships with other investment advisers that create a material conflict of interest for our clients.

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

CODE OF ETHICS

SelectAlts has adopted a Code of Ethics (the “Code”) that sets forth a standard of business conduct for our firm and all our associated persons. The purpose of the Code is to set out ideals for integrity, objectivity, competence, fairness, confidentiality, professionalism and diligence for our firm and our associated persons to espouse in the interest of our clients and investor protection. The Code includes provisions relating to the confidentiality of client information, a prohibition on insider trading, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All employees of SelectAlts are required to handle their personal securities transactions in such a manner as to avoid any actual or potential conflicts of interest or any abuse of position of trust and responsibility. Annually, we require all employees to certify that they have read, understand and will comply with the Code.

Clients and prospective clients may request a full copy of our firm's Code of Ethics by contacting our firm in writing at Kevin@SelectAlts.com or calling our firm at 860-305-9695.

PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS

SelectAlts and/or our advisors may invest in the same securities that are recommended to and/or purchased for our clients. SelectAlts has adopted procedures designed to assure that the personal securities transactions, activities and interests of SelectAlts and/or our advisors will not interfere with our ability to make investment decisions in the best interest of our clients.

PERSONAL TRADING

SelectAlts maintains and enforces written policies and procedures reasonably designed to prevent the misuse of material non-public information by our firm or any access persons of our firm with regards to their personal securities transactions. Personal trading activities are continually monitored to reasonably prevent conflicts of interest between our firm and our clients.

Brokerage Practices

SELECTION OF BROKER-DEALERS

Securities transactions are generally executed through Interactive Brokers, LLC. ("Interactive Brokers"), member FINRA/SIPC/NYSE. Interactive Brokers maintains custody of our clients' assets and effects securities transactions for our investment management clients' accounts. SelectAlts is independently owned and operated, and is not affiliated with or a related person of Interactive Brokers.

SelectAlts considers a number of factors prior to recommending a particular broker-dealer to our clients, including but not limited to, their familiarity with the securities to be sold or purchased, their execution skills, order-flow capabilities, their commission rates or other fee schedules, their custodial services, their level of net capital (financial strength) and excess SIPC and other insurance coverage. The commissions charged by Interactive Brokers are competitive with similarly situated retail broker-dealers offering the same variety of securities to clients. Clients are advised, however, that they may be able to effect transactions in securities through other broker-dealers at lower commission rates, particularly with respect to securities listed on a national securities exchange or in the over-the-counter market.

Research and Other Soft Dollar Benefits. SelectAlts does not currently utilize soft dollars as part of their management activities. Interactive Brokers does offer products or services other than execution that assist our firm in managing and administering client accounts. These may

include software and other technology that provide access to client account data (such as trade confirmations and account statements), facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts), facilitate payment of our fees from clients' accounts, and assist with back office functions, record keeping and client reporting. These services may be used to service all or a substantial number of client accounts, including accounts not maintained at Interactive Brokers.

SelectAlts may also receive services from Interactive Brokers or its affiliates that are intended to help our firm manage and further develop our business. These services may include registration support through Greenwich Compliance, website design, and technology support. Interactive Brokers also has arrangements with various product vendors, which enable our firm to purchase their products at a discount. These products may include such items as: client reporting and consolidated statement software; client communication software; client relationship management software; compliance assistance; and investment research.

Our firm routinely compares order execution disclosure information at Interactive Brokers to other broker-dealers to ensure that Interactive Brokers remains competitive in providing best execution for our clients' securities transactions. Although the brokerage commissions and/or transaction fees charged by Interactive Brokers may be higher or lower than those charged by other broker-dealers, in seeking best execution for our clients our firm strives to ensure that our clients pay brokerage commissions and/or transactions fees which we have determined, in good faith, to be reasonable in relation to the value of the brokerage and other services provided by Interactive Brokers.

Brokerage for Client Referrals. SelectAlts does not consider broker-dealer or third-party referrals in selecting or recommending broker-dealers to our clients as this would create a conflict of interest.

Directed Brokerage. Clients of SelectAlts must be aware that if they direct us to use a particular broker-dealer that it may limit our ability to achieve best execution or limit their participation in block trading. As a result, clients may pay higher commissions, have higher transaction costs, or receive less favorable prices. In situations where the client directs us to effect their transactions through a particular broker-dealer, we require such directions to be in writing.

TRADE AGGREGATION

Investment decisions deemed appropriate for one client may also be deemed appropriate for other clients so that the same security may be purchased or sold at or about the same time for more than one client. When this is the case our firm may, but is not obligated to, aggregate similar trades for multiple clients and execute the trade as a single block.

When transactions are so aggregated, the securities purchased or sold will be allocated in a fair and equitable manner. Our trade allocation procedures seek to allocate investment opportunities among our clients in the fairest possible way taking into account their best

interests. These procedures ensure that allocations do not involve a practice of favoring or discriminating against any client or group of clients. Transactions are usually aggregated to seek a more advantageous net price and/or to obtain better execution for all clients. Nevertheless, there is no assurance that the aggregation of transactions will benefit all clients equally, and in some instances combined orders could adversely affect the price or volume of a security. Also, it is possible that we may not aggregate trades in circumstances where it would be beneficial to do so.

TRADE ERRORS

When effecting trades to implement the investment decisions we make on your behalf, we or others may act in a way that results in a loss to your account. Some but not all acts related to trades that result in a loss in your account involve reimbursable errors. We will bear the cost of correcting any loss in your account that directly resulted from our acts when we determine that the act failed to meet the standard of care that we owe to you (defined as the avoidance of gross negligence, willful misconduct, or bad faith) and whose valuation was the greater of \$100 or 2 basis points of the account's assets under management.

Review of Accounts

ACCOUNT REVIEWS

SelectAlts conducts account reviews on an ongoing basis for clients subscribed to our investment management services. The frequency of the review depends upon a variety of factors such as: the client's risk profile, activity in the account, economic and market conditions, and the client's preferences, if any. Additional reviews may be triggered by changes in the investment objectives or guidelines for a particular client or specific arrangements with the client.

Formal client review meetings are generally conducted on a regular basis at intervals mutually agreed upon by the advisor and the client. During these reviews, any changes in the client's investment objectives are discussed so we can review our previous recommendations and make any necessary adjustments.

ACCOUNT REPORTS

Those clients to whom SelectAlts provides investment management services receive at least quarterly reports from our firm summarizing their account(s) and investment results. Clients are urged to compare the account statements they receive from their custodian to any written reports received from our firm.

Client Referrals and Other Compensation

CLIENT REFERRALS

SelectAlts does not have any arrangements with third-parties (or “solicitors”) to promote the investment advisory services offered by our firm.

It is our firm’s policy not to compensate clients for referring potential clients to our firm, because the client would be considered a solicitor and would have to satisfy requirements under Rule 206(4)-3 of the Advisers Act or similar state rules regarding solicitation arrangements before a cash referral fee could be paid to them.

OTHER COMPENSATION

SelectAlts does not receive an economic benefit from anyone who is not a client in exchange for our provision of investment advice or other advisory services.

Custody

CUSTODY OF CLIENT FUNDS AND SECURITIES

SelectAlts is deemed to have custody solely because advisory fees are directly deducted from the client’s account by the custodian on behalf of SelectAlts. Interactive Brokers maintains custody of client funds in separate brokerage account(s) for each client under the client’s name. SelectAlts personnel may assist the client in preparing paperwork to open a new brokerage account at Interactive Brokers, but only the client is permitted to authorize, by their signature, the opening of the account. Interactive Brokers sends an account-opening letter to each client at their physical mailing address after the account is approved.

SelectAlts possesses written authorization from client to deduct advisory fees from an account held by the qualified custodian. SelectAlts sends the qualified custodian written notice of the fee to be deducted from the client’s account and SelectAlts sends the client a written notice itemizing the fee, including any formulae used to calculate the fee, the billing time period, and the assets under management on which the fee is based.

Clients can access daily, monthly and annual account statements as well as daily trade confirmations through a password protected portion of Interactive Brokers’ website, www.interactivebrokers.com. Clients should also expect to receive quarterly account summaries from Interactive Brokers by first-class mail. Clients should carefully review the account statements and summaries received from Interactive Brokers(s) and compare such official custodial statements to any account reports provided by SelectAlts. Any client that does

not receive an account statement or summary from Interactive Brokers should call our firm immediately so that we can arrange to have another statement sent by the custodian.

Clients can also access information concerning their account(s) and access (and generally change) the settings for their brokerage account online on the Interactive Brokers website at www.interactivebrokers.com.

Investment Discretion

DISCRETIONARY AUTHORITY

SelectAlts manages client securities portfolios on a discretionary basis. SelectAlts is granted limited discretionary authority in writing by the client at the outset of the advisory relationship. This limited discretionary authorization gives SelectAlts the authority to manage the client's investment assets at our firm's sole discretion and without consulting with the client in advance, subject to the investment objectives, guidelines and restrictions set by the client. SelectAlts has discretionary authority to select the broker or dealers and the commission rates to be paid to a broker dealer as affirmatively annotated in ADV Part 1A, Item 8.C(1),(2),(3),(4). This authorization will remain in full force and effect until we receive a written termination notice of the Engagement Agreement from the client.

Voting Client Securities

AUTHORITY TO VOTE CLIENT PROXIES

SelectAlts does not accept authority from clients with respect to voting of proxies solicited by, or with respect to, the issuers of any securities held in client portfolios. Interactive Brokers will send all such proxy documents it receives to the client so that the client may take whatever action the client deems appropriate. SelectAlts does not offer clients any consulting assistance regarding proxy issues.

Financial Information

REQUIRED DISCLOSURES

As previously discussed in this brochure, SelectAlts may accept limited discretionary authority when providing investment management services if agreed upon in writing with the client. SelectAlts does not require clients to prepay more than \$500 in fees six months or more in advance.

SelectAlts does not require or solicit prepayment of fees from our clients.

SelectAlts has no financial commitments that would impair our firm's ability to meet our contractual and fiduciary commitments to our clients and has not been the subject of a bankruptcy proceeding.

Requirements for State-Registered Advisers

EXECUTIVE OFFICERS AND MANAGEMENT PERSONS

Kevin Means, CFA (b. 1958)

Founder and Principal of Select Alternative Investments LLC

Education

BA, Economics, The College of William and Mary, 1980

MA, Theology, Fuller Theological Seminary, 1982

MBA, The Darden School, University of Virginia, 1987

OUTSIDE BUSINESS ACTIVITIES

Please refer to the "Other Financial Industry Activities and Affiliations" section of this Brochure for more information.

PERFORMANCE-BASED FEES

Please refer to the "Performance-Based Fees and Side-By-Side Management" section of this Brochure for more information. Performance-based fees may create an incentive for an advisor to recommend investments that carry a higher degree of risk to the client.

LEGAL OR DISCIPLINARY EVENTS

Neither SelectAlts nor our management persons have been involved or been found liable in any arbitration claims alleging damages in excess of \$2,500 or been involved or been found liable in any civil, self-regulatory organization, or administration proceeding.

ISSUERS OF SECURITIES

Neither SelectAlts nor our management persons have any relationships or arrangements with any issuers of securities.

Form ADV Part 2B: Brochure Supplement



SELECT ALTERNATIVE INVESTMENTS, INC.

37 Hillside Lane
New Hope, PA 18938

This brochure supplement provides information about our supervised persons that supplements the Select Alternative Investments, Inc. brochure. You should have received a copy of that brochure. Please contact our firm if you did not receive Select Alternative Investments, Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about the supervised persons mentioned in this brochure supplement is available on the SEC's website at www.adviserinfo.sec.gov.

Effective Date: March 29, 2018

Kevin Means, CFA (b. 1958)
Founder and Principal
Select Alternative Investments LLC

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Education

BA, Economics, The College of William and Mary, 1980
MA, Theology, Fuller Theological Seminary, 1982
MBA, The Darden School, University of Virginia, 1987

Business Background

Select Alternative Investments LLC, New Hope, PA
2018 – Present
Founder and Principal

Prestige Wealth Management Group, Flemington, NJ
2016 – 2017
Chief Investment Officer

- Redesigned stock selection methodology, resulting in lower risk and higher return
- Redesigned mutual fund and ETF models to emphasize tactical viewpoints and lower expense ratios
- Wrote market commentaries to increase awareness of firm's investment expertise

Select Alternative Investments LLC, Farmington, CT
2012 – 2016
Founder and Principal

- Designed and implemented investment processes designed to achieve attractive absolute returns with low long-term correlations to stocks and bonds using ETFs.
- Developed risk and return models specifically for ETFs.
- Built historical ETF databases.

Alpha Equity Management LLC, Hartford, CT
2000 – 2011

Founder, Managing Partner, and Chief Investment Officer

- Designed and implemented investment processes leading to outstanding performance results across a variety of equity asset classes, including U.S., international, and real estate securities.
- Recruited and managed six senior-level partners and five experienced staff members.

- Designed marketing materials and spearheaded marketing efforts that resulted in attracting AUM of \$330 million.
- Very early developer of 130/30 funds, applying the concept to U.S., international, and REIT hedge funds and mutual funds.
- Managed RidgeWorth U.S. Equity 130/30 Fund (SUEIX) to a Morningstar five-star ranking.

Aeltus Investment Management, Inc., Hartford, CT

1994 – 1999

Chief Investment Officer - Equities

- Responsible for \$22 billion in institutional and retail equity assets under management.
- Managed equity investment department of 55 portfolio managers, analysts, traders, and staff.
- Lead portfolio manager on funds totaling \$11 billion.
- Developed new investment products and processes including U.S. large cap and small cap, international, equity real estate securities, and global tactical asset allocation.
- Designed and managed the Aetna Generation Funds, a group of multi-asset class “lifestyle funds.”
- Directed launch of and hired portfolio managers for Aetna International Fund and Aetna Real Estate Securities Fund.

Invesco Management & Research Inc., Boston, MA

1992 – 1994

Chief Investment Officer

- Responsible for \$2 billion in institutional assets under management.
- Transformed a traditional money management firm (Gardner & Preston Moss) into the “quant shop” within the Invesco group of companies.
- Created a new mid-cap equity product which attracted \$200 million in institutional assets.
- Developed a multi-asset class “lifestyle” fund product which was offered as the Invesco Multi-Flex Fund (a mutual fund).

Invesco Capital Management Inc., Atlanta, GA

1987 – 1992

Director of Quantitative Research and Equity Portfolio Manager

- Enhanced stock selection model and designed multi-asset class asset allocation models.
- Created new equity REIT product which was later turned over to Invesco Realty Advisors and grew into one of the largest REIT products in the U.S.
- Created new ADR-based international equities product which became the forerunner of Invesco International, a multi-billion dollar division of Invesco.
- Developed a small cap U.S. equity product which was offered as the Invesco Small Cap Fund (a mutual fund) and which attracted over \$100 million in institutional assets.

Ann Means (b. 1959)
Director of Marketing and Client Service
Select Alternative Investments LLC

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Education

BA, Art History, Smith College, 1980
MS, Art Conservation, The University of Delaware, 1986
MS, Polymer Science, University of Connecticut, 1992

Business Background

A Means Business Services, Farmington, CT
2014 – Present
Principal

- Provides financial management and reporting for professional service providers.
- Leads organizational strategic planning.
- Performs marketing and sales assistance for clients.

VRSim, East Hartford, CT
2013 – 2014

Manager – Sales and Marketing

- US corporate sales director.
- Created print and electronic marketing for new product launch and directed lead generation and customer cultivation efforts.

Connecticut Technology Council, East Hartford, CT
2011 – 2013

Chief Operating Officer/ Manager of Events and Development

- Directed finance and operations for CT's largest trade association for technology business.
- Responsible for planning, budgeting and execution of 50+ public events annually for the Southern New England venture capital community.

Design By Analysis, Inc., Middlebury, CT
2007-2010

Co-Founder and Manager- Business Operations

- Prepared RFQs, sales quotes and project work statements.
- Developed yearly sales plans and monthly targets.

- Evaluated and implemented a cloud-based CRM platform, migrating 10,000 contact locally-hosted system.

Achievement First, New Haven, CT

2005-2006

Business Manager/Director of CT Operations

- Finance and operations director in Connecticut for educational management organization.
- Tracked and reported to state on professional staff certification and professional development.
- HR Administrator responsible for employee on-boarding and benefit administration.

Design By Analysis, Inc., Middlebury, CT

1996-2005

Co-Founder and Manager of Operations

- Developed and implemented work policies, procedures and employee handbook.
- Prepared RFQs, sales quotes and project work statements.
- Directed financial and internal operations of mechanical design firm.

DISCIPLINARY INFORMATION

Our firm's supervised persons have not been involved in any legal or disciplinary events that would be material to a client's or prospective client's evaluation of the integrity of our management.

OTHER BUSINESS ACTIVITIES

Our supervised persons are not actively engaged in any investment-related business or occupation other than their positions at Select Alternative Investments. They do not receive any commissions, bonuses or other compensation based on the sale of securities or other investment products.

ADDITIONAL COMPENSATION

Our supervised persons do not receive any additional compensation, apart from their regular salary and bonuses, that is based, all or in part, on the number or amount of sales, client referrals, or new accounts. Our supervised persons do not receive any economic benefit from anyone who is not a client for providing advisory services.

SUPERVISION

Kevin Means is the sole Principal and Chief Compliance Officer ("CCO") of our firm and as such has no internal supervision placed over him. He is, however, bound by the firm's Code of Ethics. He may be contacted at 860-305-9695 or by email at **Error! Reference source not found.** He supervises and monitors the advisory and personal trading activities of all supervised persons for compliance with federal and/or state securities laws.

REQUIREMENTS FOR STATE-REGISTERED ADVISERS

Our firm's supervised persons have not been involved or been found liable in any arbitration claims alleging damages in excess of \$2,500, in any civil, self-regulatory organization, or administration proceeding, or been subject of any bankruptcy petition.

PROFESSIONAL CREDENTIALS DESCRIPTION

Chartered Financial Analyst (CFA). The CFA charter is a globally respected, graduate-level investment credential established in 1962 and awarded by the CFA Institute — the largest global association of investment professionals. 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; and
- 4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

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

- 1) place their clients' interests ahead of their own;
- 2) maintain independence and objectivity;
- 3) act with integrity,
- 4) maintain and improve their professional competence; and
- 5) disclose conflicts of interest and legal matters.

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.

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.