



MOVEMENT

— C A P I T A L —

Firm Brochure

Form ADV Part 2A

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This brochure provides information about the qualifications and business practices of MVMT Capital LLC (“Movement Capital”). If you have any questions about the contents of this brochure, please contact us.

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or any state securities authority.

Movement Capital is a registered investment advisor. Registration does not imply a certain level of skill or training. Additional information about us is available on the SEC’s website at www.adviserinfo.sec.gov.

ITEM 2. MATERIAL CHANGES

This brochure contains the following updates:

- Item 4 updates current assets under management.
- Item 5 updates the flat fee for new clients.
- Item 12 adds Charles Schwab as a custodian.

Clients will be offered future brochures within 120 days of the end of the calendar year.

Current Form ADV files are always available at www.advisorinfo.sec.gov.

The goal of this document is to provide you with an easy to understand “plain-English” brochure.

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ITEM 4. ADVISORY BUSINESS

1. Description of Advisory Firm

Movement Capital is an independent advisory firm that provides investment management, investment consulting, and financial planning for a flat annual fee.

Our investing approach combines a disciplined philosophy backed by academic research with competitive advisory fees. As a fiduciary, we offer objective advice, do not charge commissions, and do not sell financial products.

Movement Capital is a Mississippi Limited Liability Company formed in 2015. Roger Adam Collins owns 100% of the company. The firm serves local clients near its office and remote clients across the country.

We first meet with you to determine your goals, time horizon, risk tolerance, tax situation, and any special circumstances. We then:

- Create an investing plan to accomplish your financial goals.
- Implement your plan using the appropriate account structures and asset classes.
- Monitor progress and rebalance your portfolio as allocations drift from target ranges.
- Report performance through an online portal and quarterly statements.
- Meet regularly to review your portfolio and make adjustments as goals change.

2. Types of Advisory Services

Investment Management and Consulting

Investment management is for clients who want a hands-on advisor to take care of all portfolio management responsibilities. Investment consulting is for clients that are interested in guidance on how their portfolio should be allocated.

Our investing framework is based on three core principles:

- Minimize Costs: You should capture more of what you earn and pay lower fees. We charge a flat advisory fee, use low-cost ETFs and mutual funds, and emphasize tax efficiency.
- Avoid Big Mistakes: Your portfolio should be globally diversified, protected from inflation, and avoid concentrated investment risk.
- Keep It Simple: An investment strategy should make sense. Simple portfolios are easier to maintain and more likely to stand the test of time than complex solutions.

We manage all client portfolios and do not outsource management to sub-advisors.

Financial Planning

Financial planning includes:

- Retirement planning to stress test retirement viability, analyze withdrawal strategies to seek to minimize taxes, and evaluate ways to reduce sequence of returns risk.
- Social Security filing strategies to potentially maximize benefits for you and your spouse.
- College savings preparation to project what is needed for college goals, which college savings plan to use, and the investment allocation of 529 accounts.
- Insurance review to make sure your auto and umbrella coverage levels are appropriate.
- Roth IRA conversion analysis to determine the potential benefit of Roth IRA conversions.

3. Client Services and Client Imposed Restrictions

We offer the same services to all clients. You may impose restrictions about investing in certain securities in accordance with your values or beliefs.

4. Wrap Fee Programs

We do not participate in a wrap fee program.

5. Assets Under Management

<u>Discretionary Amounts</u>	<u>Non-discretionary Amounts</u>	<u>Date Calculated</u>
\$31,285,655	\$0	February 24, 2021

Investment consulting assets are not included in the above figures.

ITEM 5. FEES AND COMPENSATION

Annual Fee Schedule

<u>Investment Management</u>	<u>Investment Consulting</u>	<u>Financial Planning</u>
\$5,000	\$5,000	Variable

These fees are sometimes negotiable. The cost of financial planning is a function of its scope. More complex work like retirement planning is subject to a flat rate mutually agreed upon by the client and Movement Capital. You may terminate the agreement without penalty within five business days of signing.

Payment of Fees

Investment management fees are billed quarterly in arrears and are calculated as one quarter of the annual amount specified in each client agreement. Investment consulting fees are invoiced quarterly via email and can be paid by check, ACH, or card.

Client Responsibility for Third Party Fees

You are responsible for all third party fees such as fund expenses and commissions. We do not receive any portion of these fees.

We may invest or recommend that you use ETFs and mutual funds. The fee that you pay us for advice is separate from expenses charged by these funds. We primarily use Vanguard funds due to their low costs but are comfortable using other funds if Vanguard funds become more expensive or less liquid.

You will incur commissions when securities are bought or sold. Charles Schwab and Interactive Brokers are our custodians for investment management clients and offers competitive commission rates. Further info on these custodians is in item 12 of this brochure. We prefer to minimize portfolio turnover and don't expect you will incur material commissions.

Outside Compensation for the Sale of Securities to Clients

We do not accept compensation for the sale of investment products.

ITEM 6. PERFORMANCE-BASED FEES

We do not charge performance-based fees.

ITEM 7. TYPES OF CLIENTS

We generally offer services to high net worth individual investors. However, we may accept other types of clients at our discretion. There is no account size minimum.

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

Methods of Analysis

When we begin working together, we first outline your financial goals to ensure there's a mutual understanding of what you want to accomplish. We then suggest an investment strategy based on these goals.

We are a quantitative manager and use data-driven models. These models are guided by a systematic framework for consistency of advice while seeking to provide optimized returns.

Risk of Loss

Investing involves risk. Types of risk can include:

- **Inflation risk:** Returns may be less than the general increase in prices.
- **Investment style risk:** Returns from one investment style may trail another style.
- **Interest rate risk:** Bond prices will fluctuate as interest rates change.
- **Market risk:** A financial market may fall due to political upheaval, natural disaster, etc.
- **Currency risk:** Foreign investments may decrease in value if the U.S. dollar appreciates.
- **Tax risk:** Taxing authorities may change tax rates or policies.

- **Liquidity risk:** The ability to buy or sell a security may become more difficult.
- **ETF risk:** ETFs may not effectively execute their underlying investment strategy. Investing in ETFs carries the risk of capital loss, sometimes up to 100% in the event of stock bankruptcy.
- **Quantitative analysis risk:** Our decisions are based on quantitative models. No assurance can be given that the strategies will be successful under all or any market conditions.

We seek to reduce these risks by investing in diversified global stock funds and investment-grade bond funds. All of the securities we use offer daily liquidity. We do not use leverage or invest in hedge funds or structured products.

Investing involves a risk of loss that you should be willing to bear.

ITEM 9. DISCIPLINARY INFORMATION

We have no disciplinary information to report.

ITEM 10. OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

We are not registered as a broker-dealer, futures commission merchant, commodity pool operator, or commodity trading advisor. We do not have any relationships with other advisory businesses or use third-party investment advisors.

ITEM 11. CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT

TRANSACTIONS AND PERSONAL TRADING

Our code of ethics is available to any client or prospective client. It addresses prohibited purchases and sales, personal securities transactions, conflicts of interest, client gifts, confidentiality, compliance with regulations, record keeping, and annual reviews.

We do not recommend that clients buy or sell any security in which Movement Capital or its representatives have a material financial interest. Representatives of Movement Capital may buy or sell securities for themselves that they recommend to clients. This may result in buying or selling securities before or after recommending securities to clients. We will not engage in personal trading that operates to the client's disadvantage.

ITEM 12. BROKERAGE PRACTICES

Brokerage Selection

Movement Capital is independent and is not affiliated with a broker-dealer. We use the services of a custodian to safeguard client assets and execute transactions. Advisors generally select custodians based on “best execution,” which is the obligation to seek execution of securities transactions for clients on the most favorable terms. This does not mean that clients will necessarily pay the lowest commission rate.

We require investment management clients to open an account with Charles Schwab or Interactive Brokers. We cannot withdraw funds other than the advisory fee as authorized by the client.

Investment consulting clients use the custodian of their choice. They may pay higher commissions than if we were granted management authority.

Non-Participation in Soft Dollar Transactions

We do not receive research or products (“soft dollars”) in connection with client transactions.

We may receive unsolicited products and services from our custodians that are standard to their advisor relationships. Since these products and services are made available to all advisors we do not consider them to be soft dollars.

Referrals

We do not receive referrals from any broker-dealer or third party.

ITEM 13. REVIEW OF ACCOUNTS

We monitor accounts on an ongoing basis with at least a quarterly review to make sure client portfolios are aligned with their investment objectives and financial goals.

Investment management clients are mailed a quarterly report detailing balances and performance. Investment consulting clients receive statements from their custodian.

ITEM 14. CLIENT REFERRALS AND OTHER COMPENSATION

We do not pay anyone to refer clients to us, nor do we refer clients for pay.

ITEM 15. CUSTODY

We do not have physical custody of client assets. We will be deemed to have limited custody when advisory fees are deducted from accounts at our custodians and must have written authorization to do so. Payment is not made to Movement Capital when a client funds their account as we only accept payment for advisory services. You should carefully review custodial statements and compare them to the statements we provide.

ITEM 16. INVESTMENT DISCRETION

We have discretionary authority for investment management accounts at our custodians. With discretionary authority, we can make investing decisions without prior client contact. Investment consulting clients have discretion over their accounts.

We suggest clients enable margin. It takes two days for ETF sales to settle in cash accounts before the proceeds can be used. Due to the rebalancing sometimes necessary in our investment models, margin allows us to sell and purchase replacement securities in the same day. Margin is only enabled for this purpose and not for leverage.

ITEM 17. VOTING CLIENT SECURITIES

We do not vote proxies for you. You will receive proxies directly from the custodian.

ITEM 18. FINANCIAL INFORMATION

We do not accept fee prepayment and are therefore not required to include a balance sheet. We have no financial condition that is likely impair our ability to meet contractual commitments to you. We have not been the subject of a bankruptcy petition in the last ten years.

ITEM 19. REQUIREMENTS FOR STATE REGISTERED ADVISORS

Movement Capital has one management person: Roger Adam Collins. Education background, business experience, and other business activities can be found on his Form ADV Part 2B.

We do not accept performance-based fees. There are no civil, self-regulatory organization, or arbitration proceedings to report. Roger Adam Collins operates websites that GraniteShares sponsors. GraniteShares does not incentivize Movement Capital to use its ETFs and Movement Capital does not use GraniteShares ETFs in any client account.

PRIVACY POLICY

We are committed to safeguarding clients' personal information. Confidentiality is important to us and we take strict measures to protect this information.

Personal Information

To provide advisory services, we collect nonpublic personal information from clients. The type of information collected depends upon the client relationship. For investment management and financial planning clients, this typically includes, but is not limited to, home address, cell phone number, social security number, date of birth, banking information, financial account numbers and balances, and sources of income. For investment consulting clients, this typically includes home address and cell phone number.

We do not currently share information with anyone else for marketing purposes and do not disclose client information except as permitted or required by law. We do not disclose clients' personal information to third parties without our clients' authorization and only for the purpose of providing services on our clients' behalf.

Federal law allows you the right to limit sharing of your nonpublic personal information by opting-out. State laws and individual companies may give you additional rights to limit sharing. We may begin sharing information on the day you sign an agreement. If you are no longer our client, we may continue to share your information as described in this notice. Please notify us if you want to opt out of these types of sharing.

Security

We have technical and physical safeguards to seek to protect personal information about current and former clients from unauthorized access. Technical procedures limit the accessibility of client information contained in electronic form. Physical safeguards prevent access to client information contained in hard-copy form.

Please call if you have any questions. Your privacy, our professional ethics, and the ability to provide you with quality financial services are important to us.