

Item 1 - Cover Page



CLYM LLC

CRD Number 318567

266 Reservation Road F306

Marina, CA 93933

831.309.9600

www.clymwealth.com

Form ADV Part 2A

Firm Brochure

March 15, 2024

This brochure provides clients and prospective clients with information about CLYM LLC and the qualifications, business practices, and nature of its services that should be carefully considered before becoming an advisory client. The contents of this brochure have not been approved or verified by the Securities and Exchange Commission (SEC) or any other state or federal authority.

While the firm and its associates can be registered and/or licensed within a particular jurisdiction, that registration and/or licensing in itself does not imply an endorsement by any regulatory authority, nor does it imply a certain level of skill or training on the part of the firm or its associated personnel.

Questions relative to the firm, its services, or this Form ADV Part 2A can be made to the attention of Carmel York at (831)309-9600. Additional information about the firm, other advisory firms, or associated investment advisor representatives is available on the Internet at www.adviserinfo.sec.gov.

As with all firm documents, clients and prospective clients are encouraged to review this brochure in its entirety and are encouraged to ask questions at any time prior to or throughout the engagement.

We can at any time update this document. Annually we will either send the latest brochure or a summary of material changes as well as an offer to send an electronic or hard copy form of the updated brochure. Clients are also able to download this brochure from the SEC's website at www.adviserinfo.sec.gov or contact the firm at (831) 309-9600.

Important Information: Throughout this document, CLYM LLC shall also be referred to as the "firm," "our," "we" or "us." The client or prospective client can also be referred to as "you," "your," etc., and refers to a client engagement involving a single *person* as well as two or more *persons*. The term "advisor" and "adviser" are used interchangeably where accuracy in identification is necessary (i.e., internet address, etc.).

Item 3 - Table of Contents

Item 1 - Cover Page..... 1

Item 2 - Material Changes..... 2

Item 3 - Table of Contents 3

Item 4 - Advisory Business 4

Item 5 - Fees and Compensation 6

Item 6 - Performance-Based Fees and Side-By-Side Management 10

Item 7 - Types of Clients..... 10

Item 8 - Methods of Analysis, Investment Strategies and Risk of Loss..... 10

Item 9 - Disciplinary Information 13

Item 10 - Other Financial Industry Activities and Affiliations 13

Item 11 - Code of Ethics, Participation or Interest in Client Transactions and Personal Trading..... 14

Item 12 - Brokerage Practices..... 17

Item 13 - Review of Accounts 20

Item 14 - Client Referrals and Other Compensation 21

Item 15 - Custody..... 22

Item 16 - Investment Discretion 22

Item 17 - Voting Client Securities..... 22

Item 18 - Financial Information 22

Item 19 - Requirements for State-Registered Advisers 23

Form ADV Part 2 - Brochure Supplement (Principal Executive) 25

Item 4 - Advisory Business

Description of the Firm

CLYM LLC is an investment advisor domiciled in the State of California and had been originally formed in November of 2021. There are no subsidiaries nor is the firm controlled by another financial services industry entity. In addition to the firm's 2022 registration as an investment advisor in California, as required the firm and its associated personnel will register or meet certain exemptions to registration in other jurisdictions where advisory business is conducted.

CLYM LLC offers integrated financial planning and investment management services to clients. We apply the financial planning process to help clients make financial decisions that align with their values and long-term goals and offer periodic reviews to assist them in tracking those goals. Based on the financial plan and client risk preference, we design, implement, monitor and rebalance their investment portfolio in accordance with the client's investment objectives. In support of the client's implementation of the financial plan, we set times to coordinate with the client's other professionals, such as attorneys, accountants, insurance agents, etc. Such outside professionals are engaged directly by the client on an as-needed basis.

We do not act as a custodian for client assets. Any assets under our direct management are held at a qualified custodian and the client always maintains asset control. When placing trades for client accounts, we do so under a limited power of attorney.

We hold ourselves to a fiduciary standard, which means our firm and its associates will act in the utmost good faith and perform in a manner believed to be in the best interests of our clients.

We are strictly fee-only, paid directly by our clients. We don't sell any financial or other commissioned products, and we are not affiliated with any financial institution that does. We don't accept commissions, referral fees or finder fees of any kind. We feel the fee-only form of compensation minimizes conflicts of interest.

Carmel York is firm Principal, Chief Compliance Officer and Managing Member.¹ She is also the firm's owner. Additional information involving Ms. York is described in the accompanying Form ADV Part 2B brochure supplement.

Advisory Services

Wealth Advisory Services

Our primary offering is our Wealth Advisory Service, an ongoing relationship which integrates the financial planning and investment management services described below. In addition, Wealth Advisory Services at times will also include coordinating interactions with outside professionals, such as attorneys, tax advisors and insurance professionals, to assist the client in the implementation of financial planning recommendations.

¹Please refer to the end of this brochure for further information about associated personnel professional designations.

Financial Planning Services

Financial Planning Services are generally experienced by the client as meetings or phone calls for the purposes of gathering information, reviewing the client's financial situation and presenting our financial planning recommendations. We typically begin with a discovery meeting(s) to understand the client's situation and needs, including goals, planning horizon, resources and constraints. We require the client to provide financial and other documentation necessary for us to provide advice. We then evaluate and analyze the client's current situation and present our recommendations on ways to help achieve the stated goals. The client is always free to accept or reject our recommendations and retains sole responsibility for implementing any financial planning recommendations.

The specific services in a financial planning engagement will vary, but topics typically can include areas such as assets and net worth, cash flow planning and debt analysis, investments, risk management and insurance planning, investments retirement planning (withdrawal strategies, Social Security and Medicare), education funding, employee benefits and stock, tax strategies and planning, specialized real estate consulting, and wealth transfer and estate planning.

If requested by the client, we at times will recommend the services of other professionals for implementation purposes. The client is under no obligation to engage the services of any such recommended professional. The client retains absolute discretion over all such implementation decisions and is free to accept or reject any of our recommendations.

Investment Management Services

Our Investment Management Services are designed for clients who wish to delegate their portfolio implementation and ongoing management to an investment professional. We offer these investment management services on a discretionary basis. Discretionary authority is described in more detail in Item 16 of this brochure.

We begin by meeting with the client to discuss our investment philosophy and the investment strategies we believe are appropriate for the client situation. Based on the financial plan, risk preference and time horizon, we develop an investment policy for client approval, and design the portfolio accordingly. We will allow for reasonable restrictions for the account (e.g., types of securities, etc.). We implement and monitor the investment portfolio, rebalancing as needed to maintain the expected risk/return balance in support of the investment objectives. We offer reports and periodic review meetings to discuss the portfolio with the client on an agreed upon schedule.

Educational Workshops

We at times will provide workshops on an "as announced" basis for groups desiring general advice on investments and personal finance. Topics can include issues related to wealth management, financial planning, retirement strategies or various other economic and investment topics. These workshops are educational in nature and do not involve the sale of any investment products. Information presented will not be based on any one person's need nor do we provide individualized investment advice to attendees during our general sessions.

General Information

We do not provide legal, tax or accounting services, nor do we sponsor or manage wrap fee investment programs. Although our financial plans at times will reference non-investment related matters, the client is advised that we do not serve as an attorney, accountant or insurance agent, and no portion of our services should be construed as legal, tax or insurance advice. The client is responsible for engaging the appropriate professional.

In order to engage our firm, the client must enter into a written agreement that sets forth the terms and conditions under which we will provide the requested services and the fees due for our services. We reserve the right to determine client eligibility for financial planning and investment management services.

The client is responsible for providing us with full, complete and accurate information, as this impacts our ability to provide appropriate recommendations. We are not required to verify any information received by the client or the client's other professionals. The client is responsible for promptly notifying us if there is any change in his/her financial situation or objectives for the purpose of our reviewing or revising previous recommendations.

Our firm will use best judgment and good faith efforts in rendering its services. We cannot warrant or guarantee any particular level of account performance, or that an account will be profitable over time. Past performance is not necessarily indicative of future results.

A current Form ADV Part 2 firm brochure that includes the firm's Privacy Policy will be provided prior to or at the time a Service Agreement is presented.

The firm will disclose any material conflicts of interest that could reasonably be expected to impair the rendering of unbiased and objective advice.

As of March 15, 2024 our firm had approximately \$2.5 million of client assets under management, all through discretionary account agreements (as defined in Item 16-Investment Discretion)

Item 5 - Fees and Compensation

As a reminder, we are a fee-only firm and do not receive any commissions or compensation from anyone other than the client. All fees will be agreed upon in writing, in advance, in the Service Agreement.

Fees are negotiable. We, at our sole discretion, can waive our minimum fee and/or charge a lesser financial planning or investment advisory fee based on certain criteria, such as combination of services, historical relationship, type of assets, anticipated future earning capacity, anticipated future assets, dollar amounts of assets to be managed, related accounts, account composition, etc.

Our firm strives to offer fees that are fair and reasonable in the light experience of the firm and the services rendered. It is possible that similar services are available from other providers, and potentially at a lower fee.

²The term "assets under management" and rounding as defined by SEC's General Instructions for Part 2 of Form ADV.

We do not have a minimum dollar value of assets for maintaining an account. However, we do impose a minimum annual advisory fee. Clients with assets below \$1,000,000 for assets under management will likely pay a higher percentage rate on their annual fees than clients with greater assets under management.

Fees for Wealth Advisory Services

Fees for Wealth Advisory Services will vary based on the complexity and scope of the engagement. We generally charge a flat retainer fee that includes ongoing financial planning and investment management up to the first \$1,000,000 in assets under management. At higher asset levels, an additional asset management fee applies. The minimum Wealth Advisory Services retainer fee is \$2,500. Fees at times will exceed this stated minimum depending on complexity and scope of engagement.

<u>Assets</u>	<u>Annual Fee %</u>
First \$1,000,000	Included in the minimum fee
\$1,000,001 to \$3,000,000	0.70%
\$3,000,001 to \$5,000,000	0.40%
Over \$5,000,000	0.30%

As an illustrative example, a client subject to the above fee schedule placing \$1,500,000 under management would be subject to an annual retainer fee of \$10,000 for the first \$1,000,000 and an annual fee of 0.70% on the remaining \$500,000.

Fees for Investment Management Services

Fees for Investment Management Services for Managed Accounts are as follows:

<u>Assets</u>	<u>Annual Fee %</u>
First \$500,000	1.00%*
\$500,001 to \$1,000,000	0.90%
\$1,000,001 to \$3,000,000	0.70%
\$3,000,001 to \$5,000,000	0.40%
Over \$5,000,000	0.30%

As an illustrative example, a client subject to the above fee schedule placing \$1,000,000 under management would be subject to an annual fee of 1% for the first \$500,000 and an annual fee of 0.90% on the remaining \$500,000.

*SUBJECT TO A MINIMUM FEE OF \$1,250 PER QUARTER.³

Investment Management Services Fees are calculated based on the total value of assets in the account, including securities and cash, at the end of the preceding quarter. Valuations are derived from recognized and independent pricing sources, such as Schwab, or other custodian.

We will at times charge a retainer fee rather than or in addition to an asset-based fee depending on the circumstances, which can include providing advice on assets not held at our custodian or a conflict of interest situation.

³The California Department of Financial Protection and Innovation has stated a fee greater than two percent of reportable assets under management can potentially be considered excessive.

Fees for Financial Planning Services

We generally provide financial planning services in the context of Wealth Advisory or other services. At our sole discretion and on a case-by-case basis, we at times will provide stand-alone financial planning services. Such financial planning engagements will typically be on a fixed fee basis. Fees for a financial plan typically start at \$3,000. The actual fee is determined based on the complexity, scope, and deliverables of the engagement. Hourly engagements, including specialized real estate consulting, are at a rate of \$250 per hour.

All fees and payment terms will be agreed upon in writing, in advance, in the Service Agreement. In the event that the client situation is substantially different than disclosed at the time of the Service Agreement, a revised fee can be presented in advance of any additional work being performed.

Fees for Educational Workshops

Our workshops are generally pro bono in nature. In the event there is a charge for a workshop, it is anticipated to be paid by the engagement sponsor, such as an employer or association. Fees for these events would typically be a flat-rate amount based on the firm's hourly fee and/or cost of workshop materials and would be negotiated with the sponsor in advance of the presentation.

Fee Payment

Unless otherwise noted in the Services Agreement, fees are payable quarterly in advance. Clients who initiate or terminate during a calendar quarter will be charged a prorated fee. In the case of termination of an account, any pre-paid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable. No adjustment or refund is made for partial withdrawals by the client during any fee period.

Fees for these accounts will generally be automatically assessed. Fees will be deducted from a designated account to facilitate billing, if you have authorized our firm in writing to allow the selected broker/dealer, custodian, etc. (collectively we term "service provider") to deduct our advisory fees from your account. Please note that if there is not adequate cash in the brokerage/custodial account to pay these fees, it can be necessary to liquidate account holdings to cover fees due to our firm or the selected service provider. For those accounts held by a custodian other than the firm's custodian, fees for these accounts will be automatically assessed to an account at the firm's custodian.

All investment management fees paid to our firm will be reported on your monthly statement provided directly by Schwab or other custodian.⁴ We will send you an invoice of the fees being deducted from your account. The invoice will include the total fee assessed, covered time period, calculation formula utilized, and reference to the assets under management in which the fee had been based. You will share responsibility for verifying the accuracy of fee calculations in the invoice and/or statement.

We reserve the right to amend fees upon 30-day written notice to clients.

In the event that your situation is substantially different than disclosed at the time of the Service Agreement, a revised fee can be presented in advance of the work being performed.

⁴Schwab acts as an introducing broker/dealer that executes transactions and performs asset custody on a fully disclosed basis.

Other Potential Fees

Investment management fees paid to our firm are separate from, and do not include, any brokerage commissions, transaction fees and other charges imposed by custodians, brokers, mutual funds, ETFs or other third parties. We do not receive any portion of such commissions, fees and charges and we do not receive “trailer” or SEC Rule 12b-1 fees from any investment company.

Any transactional (“brokerage”) or custodial fees assessed by the selected service provider, individual retirement account fees, or qualified retirement plan account termination fees are borne by the client and are as provided in the current, separate fee structure of the selected service provider. Fees charged by investment companies or issuers are detailed in prospectuses or product descriptions, and you are encouraged to read these documents before investing.

In order to implement the financial plan, the client at times will also incur other fees to outside professionals, such as attorneys, tax advisors, insurance or other professionals. Depending on the scope of the engagement, we can coordinate with a team of other professionals regarding client situation. These other professionals are engaged directly by the client. The advisory fee charged by our firm does not include payment of any fees to these outside professionals. Clients are not required to act upon advice or engage with any professional recommended by the Firm

For further information about our fees in relationship to our business practices are noted in Item 12 of this document.

Neither CLYM LLC nor its representatives accept compensation from the sale of securities or other investment products.

Termination of Services

Either party can terminate the agreement at any time, which will typically be in writing. Should you verbally notify our firm of the termination and, if in two business days following this notification we have not received your notice in writing, we will make a written notice of the termination in our records and send you our own termination notice as a substitute.

If you are a new client, and our Form ADV Part 2 brochure has not been delivered to you at least 48 hours prior to entering into the investment advisor contract, then you will have the right to terminate the engagement without fee or penalty within five business days after entering into this agreement. Should you terminate an engagement after this date, you will be invoiced for any time incurred or services rendered by our firm. In the case of any prepaid fees, we will promptly return any unearned amount upon receipt of a written termination notice.

Our firm will not be responsible for future allocations, transactional services or investment advice upon receipt of a termination notice. Upon termination, it will also be necessary that we inform the custodian of record serving the account that the relationship has been terminated. It will be yours or your legal representative’s responsibility to ensure a transfer is completed of any portfolio, account or account residual to the receiving custodian.

We reserve the right to terminate any engagement at any time at our discretion, including, but not limited to, where a client has willfully concealed or has refused to provide pertinent information about financial situations when necessary and appropriate to providing proper financial advice, per our judgment.

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

The firm's investment services fees will not be based upon a share of capital gains or capital appreciation of the funds or any portion of funds of an advisory contract, also known as performance-based fees. CLYM LLC also prohibits any affiliated entity or employee to engage in or benefit from side-by-side investment management arrangements, often reflective of managing a hedge fund or other similarly pooled fund.

Item 7 - Types of Clients

The firm provides its services to individual investors, trusts, estates, and charitable organizations, and business entities of various size and scope. Please refer to Item 5 for information involving minimum account sizes, quarterly minimum fees, etc. for our services. CLYM LLC has the right to waive or modify certain fees based on unique individual circumstances, special arrangements, pre-existing relationships or as otherwise can be determined by the firm. We reserve the right to decline services to any prospective client for any non-discriminatory reason.

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

Methods of Analysis

When we are engaged to provide investment advice or management we will first evaluate several factors include your current financial situation, needs, goals, objectives and tolerance for risk. Based on these factors we make asset allocation and investment policy decisions and recommendations. We will then discuss with you how, in our best judgment, to meet your objectives with a prudent level of risk exposure.

We implement your portfolio based on your asset allocation and investment policy. We typically utilize no-load mutual funds and ETFs, with low costs and long term performance a priority. When appropriate for your portfolio we can use individual debt and equity services, real estate investment trusts, limited partnerships or other forms of private investments.

Our recommendations and implementation are based on what we think to be appropriate review and analyses designed to develop effective long-term investment strategies. Our analysis involves a multifactor evaluation which can include economic and market factors globally, regionally, country-specific and/or sector-specific.

A blend of fundamental and technical analyses can be used. Fundamental analysis involves using data to evaluate a security's intrinsic value. For example, fundamental analysis of a bond's value could involve evaluation economic factors including interest rates, the current state of the economy, and information about the bond issuer's credit ratings. Fundamental analysis of a stock takes into account revenues, earnings, future growth, return on equity, profit margins and other data to evaluate a company's value and potential for future growth.

Technical analyses at times will involve studying the historical patterns and trends of securities, markets, or economies as a whole in an effort to determine potential future behaviors. These methods are based upon analyzing statistics generated by market activity, such as past prices and trading volume, among others. Mutual fund analyses can involve studying the philosophies, experience, and track record of the management team as well as the long-term performance of the fund in relation to its fund category.

Risk, fees, stewardship, dividends, tax efficiency, inception date and individual holdings can be considered. For fixed income funds duration, maturity, credit quality and holding types can also be considered. By combining these analyses, the firm thinks it will better assist the client in determining the appropriate strategy that has been adapted to their requirements and goals.

Our research, analysis and recommendations can be derived from sources that include: financial publications, software technology, securities rating services, outside research reports, general market and financial information, public securities reports, press releases, due diligence reviews, and specific investment analysis requested by the clients from time-to-time.

Investment Strategies

Our investment strategies are based on the fundamental concept of diversification to reduce unnecessary risk and to provide long term performance. The firm implements diversification through strategic asset allocation and appropriate allocation rebalancing.

Our goal is to deliver real returns through a portfolio that strikes an appropriate balance of risk and growth opportunity. Each client is unique, and so we customize the portfolio based on risk tolerance, needs and other circumstances and preferences, such as Sustainable and Responsible Investing (SRI). We utilize best-in-class investment choices, typically institutional class mutual funds and ETFs, researching and selecting the solutions that are best aligned with your overall plan

Risk of Loss

While CLYM LLC thinks its strategies and investment selection is designed to potentially produce the highest possible return for a given level of risk, it cannot warrant or guarantee that an investment objective or planning goal will be achieved. Some investment decisions made by either the firm or the client can result in loss, which can include the original principal invested.

The client must be able to bear the various risks involved in the investment of account assets, which can include market, currency, interest rate, liquidity, and operational or political risk, among others.

The challenge involving fundamental analyses is that information obtained can be incorrect; an analysis at times will not provide an accurate estimate of earnings, which can be the basis for a security's value. If a security's price adjusts rapidly to new information, a fundamental analysis can result in unfavorable performance. The risk of investing based on technical analysis is that it at times will not consistently predict a future price movement; the current price of a security can reflect all known information.

When the firm's research and analyses is based upon commercially available software, rating services, general market and financial information, or due diligence reviews, the firm is relying upon the accuracy and validity of the information or capabilities being provided by selected vendors, rating services, market data, and the issuers themselves. The firm makes every effort to determine the accuracy of the information received but it cannot foretell events or actions taken or not taken, or the validity of all information it has researched or provided which can affect or not affect the advice to or investment management of a client account or financial plan.

Core and Satellite investing with actively managed securities can have the potential to be affected by "active risk" or "tracking error risk," which might be defined as a deviation from the stated benchmark. Since the core portfolio attempts to closely replicate a stated benchmark, the source of the tracking

error or deviation can come from a satellite portfolio or position, or from a “sample” or “optimized” index ETF that does not as closely align the stated benchmark. In these instances, the firm at times will choose to reduce the weighting of a satellite holding; utilize very active satellites, or use a “replicate index” ETF as part of its core holdings to minimize the effects of the tracking error in relation to the overall portfolio.

Portfolios or certain holdings that involve active management strategies can at times outperform or underperform various benchmarks or other strategies. In an effort to meet or surpass these benchmarks, active portfolio management can require more frequent trading or “turnover” within an account. This can result in shorter holder periods, higher transactional costs and/or create taxable events that will be borne by the client, thereby potentially reducing or negating certain benefits that can be derived by shorter term investing.

ETFs and mutual funds can carry additional expenses based on their share of operating expenses and certain brokerage fees, which can result in the potential duplication of certain fees. The risk of owning these types of holdings also reflects the risks of their underlying securities. Further, while many ETFs and certain mutual funds are known for their potential tax-efficiency and higher “qualified dividend income” (QDI) percentages, there are certain asset classes within these investment vehicles or holding periods within that perhaps will not benefit. Shorter holding periods as well as certain commodities and currencies (that can be part of an ETF or mutual fund portfolio) can be considered “non-qualified” under certain tax code provisions, therefore, the holding’s QDI will be considered if tax-efficiency is an important aspect of the client’s portfolio.

Investing in limited partnerships involves certain risks related to investing in their underlying assets, as well as the risks associated with pooled investment vehicles (certain pooled investments can be less regulated than others). In addition, limited partnerships that concentrate in a particular industry or a particular geographic region are subject to risks associated with that specific industry or region. A potential benefit derived from a limited partnership is also dependent on the holding being treated as a partnership for federal income tax purposes; if part or all of the limited partnership is not, it can have potential adverse tax consequences on the portfolio.

Risks involved in real estate investment trusts (REITs) investing can include eight key areas: *(i)* following the sale or distribution of assets an investor can receive less than their principal invested, *(ii)* a lack of a public market in certain issues, *(iii)* limited liquidity and transferability, *(iv)* a fluctuation of value of the assets within the REIT, *(v)* reliance on the investment manager to select and manage assets, *(vi)* changes in interest rates, laws, operating expenses, and insurance costs, *(vii)* tenant turnover, and *(viii)* current market conditions that at times will make REITs less desirable.

If you require your portfolio to be invested according to socially conscious principles, you should note that a return on an investment of this type can be limited and because of this limitation you will potentially not be able to be as well diversified among various asset classes. The number of publicly traded companies that meet socially conscious investment parameters is also limited, and due to this limitation, there is a probability of similarity or overlap of holdings, especially among socially conscious mutual funds or ETFs. Therefore, there could be a pronounced positive or negative impact on a socially conscious portfolio, which could be volatile compared to a fully diversified portfolio.

Item 9 - Disciplinary Information

Neither CLYM LLC nor any of its associated personnel has been involved in a material criminal or civil action in a domestic, foreign or military jurisdiction, an administrative enforcement action, or self-regulatory organization proceeding that would reflect poorly upon our firm's advisory business or the integrity of our firm.

Item 10 - Other Financial Industry Activities and Affiliations

The firm's policies require it and its personnel to conduct business activities in a manner that avoid actual or potential conflicts of interest between the firm, employees and clients, or that will otherwise be contrary to law. The firm will provide disclosure to its client prior to and throughout the term of an engagement of any conflicts of interest which as the potential to reasonably compromise its impartiality or independence.

Neither our firm nor a member of its management is, or has a material relationship with any of the following types of entities:

- broker/dealer, municipal securities dealer, or government securities dealer or broker
- futures commission merchant, commodity pool operator, or commodity trading advisor
- bank, credit union or thrift institution, or their separately identifiable departments or divisions
- lawyer or law firm
- accountant or accounting firm
- another investment advisor, including financial planning firms, municipal advisors or third-party investment managers
- insurance company or agency
- pension consultant
- real estate broker or dealer
- sponsor or syndicator of limited partnerships
- trust company
- investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund," and offshore fund)

Upon a client's request and when appropriate to do so, our firm at times will provide referrals to various professionals, such as an accountant or attorney. We do not have an agreement with or receive fees from these professionals for these informal referrals. Any fees charged by these other entities for their services are completely separate from advisory fees charged by our advisory firm.

Neither CLYM LLC, nor its representatives, are registered or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

Neither CLYM LLC, nor its representatives, are registered or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or a representative of the foregoing.

CLYM LLC does not recommend or select other investment advisors for clients.

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

The firm holds itself to a *fiduciary standard*, which means CLYM LLC and its personnel will act in the utmost good faith and perform in a manner thought to be in the best interest of its clients. The firm thinks its business methodologies, ethics rules, and adopted policies are appropriate to eliminate or at least minimize potential material conflicts of interest and to appropriately manage any material conflicts of interest that remain. Clients should be aware that no set of rules can possibly anticipate or relieve all potential material conflicts of interest.

Code of Ethics

The firm has adopted a Code of Ethics that sets forth the policies of ethical conduct for all personnel and accepts the obligation not only to comply with the mandates and requirements of all applicable laws and regulation but also to take responsibility to act in an ethical and professionally responsible manner in all professional services and activities. The firm's policies include the prohibition against insider trading, circulation of rumors, certain political contribution activities, among others. Our firm periodically reviews and amends its Code of Ethics to ensure that it remains current, and requires firm personnel to annually attest to their understanding of and adherence to the firm's Code of Ethics. A copy of the firm's Code of Ethics is made available to any client or prospective client upon request.

Associates of the firm who are CERTIFIED FINANCIAL PLANNERS™ Practitioners who are associated with our firm adhere to the Certified Financial Planner Board of Standards, Inc.'s Code of Ethics. These principles include:

Principle 1 – Integrity

An advisor will provide professional services with integrity. Integrity demands honesty and candor which must not be subordinated to personal gain and advantage. Advisors are placed by clients in positions of trust, and the ultimate source of that trust is the advisor's personal integrity. Allowance can be made for innocent error and legitimate differences of opinion, but integrity cannot co-exist with deceit or subordination of one's principles.

Principle 2 – Objectivity

An advisor will provide professional services objectively. Objectivity requires intellectual honesty and impartiality. Regardless of the particular service rendered or the capacity in which an advisor functions, an advisor should protect the integrity of their work, maintain objectivity and avoid subordination of their judgment.

Principle 3 – Competence

Advisors will maintain the necessary knowledge and skill to provide professional services competently. Competence means attaining and maintaining an adequate level of knowledge and skill, and applies that knowledge effectively in providing services to clients. Competence also includes the wisdom to recognize the limitations of that knowledge and when consultation with other professionals is appropriate or referral to other professionals necessary. Advisors make a continuing commitment to learning and professional improvement.

Principle 4 – Fairness

Advisors will be fair and reasonable in all professional relationships. Fairness requires impartiality, intellectual honesty and disclosure of material conflict(s) of interest. It involves a subordination of one's own feelings, prejudices and desires so as to achieve a proper balance of conflicting interests. Fairness is treating others in the same fashion that you would want to be treated and is an essential trait of any professional.

Principle 5 – Confidentiality

Advisors will protect the confidentiality of all client information. Confidentiality means ensuring that information is accessible only to those authorized to have access. A relationship of trust and confidence with the client can only be built upon the understanding that the client's information will remain confidential.

Principle 6 – Professionalism

Advisors will act in a manner that demonstrates exemplary professional conduct. Professionalism requires behaving with dignity and courtesy to all who use their services, fellow professionals, and those in related professions. Advisors cooperate with fellow advisors to enhance and maintain the profession's public image and improve the quality of services.

Principle 7 – Diligence

Advisors will provide professional services diligently. Diligence is the provision of services in a reasonably prompt and thorough manner, including the proper planning for, and supervision of, the rendering of professional services.

The firm and its investment advisor representatives also adhere to the **Fiduciary Oath** developed by the National Association of Personal Financial Advisors (NAPFA) that states:

The advisor shall exercise his/her best efforts to act in good faith and in the best interests of the client.

The advisor shall provide written disclosure to the client prior to the engagement of the advisor, and thereafter throughout the term of the engagement, of any conflicts of interest, which will or reasonably can compromise the impartiality or independence of the advisor.

The advisor, or any party in which the advisor has a financial interest, does not receive any compensation or other remuneration that is contingent on any client's purchase or sale of a financial product.

The advisor does not receive a fee or other compensation from another party based on the referral of a client or the client's business.

*Following the NAPFA **Fiduciary Oath** means I shall:*

- *Always act in good faith and with candor*
- *Be proactive in disclosing any conflicts of interest that may impact a client*
- *Not accept any referral fees or compensation contingent upon the purchase or sale of a financial product.*

Privacy Policy

The firm collects non-public personal financial information about its clients from the following sources:

- Information clients or their legal agent provide to complete their financial plan,
- Information clients provide in agreements, account applications, and other documents completed in connection with opening and maintenance of accounts,
- Information clients provide orally, and

- Information received from third parties, such as brokerage firms or custodians, about client transactions.

CLYM LLC does not disclose non-public personal information about clients to anyone, except in the following circumstances:

- When required to provide services clients have requested,
- When clients specifically authorize the Firm to do so in writing, or
- When permitted or required by law.

To ensure security and confidentiality, the firm maintains physical, electronic, and procedural safeguards to protect the privacy of its clients.

Identifiable information about the client or prospective client will be maintained during the span of the engagement and for the period thereafter as required by both securities industry and state privacy laws.

The firm will notify its clients annually of its privacy policy and at any time, in advance, if its policy is expected to change.

Participation or Interest in Client Transactions

Neither the firm, employees nor any related person are authorized to recommend to a client, or effect a transaction for a client, involving any security in which the firm or a related person has a material financial interest, such as in the capacity as an underwriter, advisor to the issuer, etc.

Associates are prohibited from taking or providing a loan from a client unless it is an approved lending institution.

The firm recognizes that should it act as the advisor to the sponsor of an ERISA-qualified retirement plan (i.e., 401(k) or pension plan) and one of its investment advisor representatives serves in an advisory capacity to one or more of the plan's participants, a potential or implied conflict of interest can occur which will be disclosed to the plan sponsor and participant.

As noted in Item 4 of this disclosure, CLYM LLC provides financial planning and a broad range of investment advisory services to its clients on a fee-only basis. Due to the firm offering all of these services to a client, a potential conflict of interest can exist. Therefore, the client is under no obligation to act upon the firm's recommendations. If the client elects to act on any of the firm's recommendations, they are under no obligation to effect the transaction through our firm or a provider whom we recommend.

Personal Trading

The firm does not trade for its own account; however, its associates and any of related persons can buy or sell securities similar to those recommended to clients for their accounts. The firm can also make recommendations or take action with respect to investments for its clients that at times will differ in nature or timing from recommendations made to or actions taken for other clients or its employees. At no time will CLYM LLC or any related party receive preferential treatment over its clients.

In an effort to reduce or eliminate certain conflicts of interest involving personal trading (e.g. trading ahead of a client's order, etc.), firm policy can require the utilization of published lists that restrict or prohibit transactions in specific reportable securities transactions. Any exceptions or trading pre-clearance must be approved by the firm in advance of the transaction in any related person's account. The firm maintains the required personal securities transaction records per regulation.

Item 12 - Brokerage Practices

Factors Used to Select Broker/Dealers for Client Transactions

CLYM LLC does not maintain physical custody of any of client accounts (see Item 15). Clients' assets must be maintained in an account at a "qualified custodian" (generally a broker/dealer, bank or trust company) that is frequently assessed for its capabilities to serve as a custodian by their respective industry regulatory authority. Our firm is not a custodian, nor does it have an affiliate that is a custodian.

When engaged to provide investment management services, the firm will typically recommend clients use Charles Schwab & Co., Inc.. Our preferred custodian is a FINRA and SIPC member,⁵ and independent SEC-registered broker/dealers. As stated earlier, our firm is independently owned and operated and is not legally affiliated with these brokerages or with any provider we recommend. Broker does not supervise the firm, its agents or activities.

While our firm recommends a client use Charles Schwab & Co., Inc. as their custodian of record, the client will decide whether to do so and they will open their account with Charles Schwab & Co., Inc. by entering into an account agreement with that custodian. Our firm does not technically open the account for the client, although an associate will assist the client in doing so. If a client does not wish to place their assets with Charles Schwab & Co., Inc., then our firm potentially will not be able to manage their account under its investment management engagement.

Charles Schwab & Co., Inc. (Schwab) offers independent investment advisors various services which include custody of securities, trade execution, clearance and settlement of transactions. Our firm receives certain benefits from Schwab in the form of the support products and services they make available to our firm and other independent investment advisors. There is no direct link between our participation in the program and the investment advice we give our clients, although our firm receives economic benefits through its participation in the program that are typically not available to "retail investors." These benefits include the following products and services (provided either without cost or at a discount):

- receipt of duplicate client statements and confirmations
- access to a trading desk serving our clients
- access to block trading (which provides our ability to aggregate securities transactions for execution and then allocate the appropriate shares to our client's accounts)

⁵ CLYM LLC is not, nor required to be, a Financial Industry Regulatory Authority (FINRA) or Securities Investor Protection Corporation (SIPC) member. You can learn more about the SIPC and how it serves member firms and the investing public by going to their website at <http://www.sipc.org>.

- the ability to have advisory fees deducted directly from our client's accounts per our written agreement
- access to an electronic communications network for client order entry and account information
- access to mutual funds with no "loads" or transaction fees, and to certain institutional money managers
- discounts on research, technology, and practice management products or services provided to our firm by third party vendors

Schwab can also pay for business consulting and professional services received by our firm. Some of the products and services made available by Schwab at times will benefit our firm but perhaps will not benefit client accounts. Certain products and services made available to our firm by a custodian can qualify as "brokerage or research services" under Section 28(e) of the Securities Exchange Act of 1934. The availability of these services from a custodian can benefit our firm because we do not have to produce or purchase them as long as our clients maintain accounts at that custodian. There is a conflict of interest since our firm has an incentive to select or recommend a custodian based on our interest in receiving these benefits rather than our clients' interest in receiving favorable trade execution. As a fiduciary, CLYM LLC endeavors at all times to put the interests of its clients first, and it is important to mention that the benefit received by the firm through its participation in a custodian's support program does not depend on the amount of brokerage transactions effected through that custodian. We believe our recommendation of a custodian is in the best interests of our clients since the selection is primarily supported by the scope, quality, and cost of services provided as a whole -- not just those services that benefit only our advisory firm. Further, we will act in the best interest of our clients regardless of the custodian selected.

We periodically conduct an assessment of any recommended service provider which generally involves a review of the range and quality of services, reasonableness of fees, among other items, and in comparison to industry peers.

Best Execution

Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed in the earlier section. Our firm recognizes its obligation in seeking best execution for its clients, however, the determinative factor is not always the lowest possible cost but whether the selected service provider's transactions represent the best "qualitative" execution while taking into consideration the full range of services provided. CLYM LLC will seek services involving competitive rates but it will not always necessarily correlate into the lowest possible rate for each transaction. Our firm has determined that having its trades executed through Schwab is consistent with its duty to seek best execution for client trades. The firm periodically reviews its policies regarding recommending service providers to its clients in light of the firm's duty to seek best execution.

Directed Brokerage

Our internal policy and operational relationship with our preferred custodian requires accounts custodied with them to have trades executed per their order routing requirements. We do not direct which executing broker should be selected for our clients' accounts; whether that is an affiliate of our custodian or another executing broker of our custodian's choice. As a result a client can experience greater spreads or less favorable net prices on transactions than might otherwise be the case.

Since we routinely recommend a custodian for our advisory clients, and that custodian can choose to use the execution services of its broker affiliate for some or all of our client account transactions, there is an inherent conflict of interest involving our recommendation due to our advisory firm receiving various products, services or discounts described in this section from our custodian. Note that we are not compensated for trade routing/order flow, nor are we paid commissions on such trades. We do not receive interest on our client accounts' cash balances.

Our investment management clients are unable to engage in directed brokerage via our custodian. As a result, they can pay higher commissions or other transaction costs, potentially experience greater spreads, or receive less favorable net prices on transactions for their account than would otherwise be the case if they had the opportunity to direct brokerage.

Aggregating Securities Transactions

Trade aggregation involves the purchase or sale of the same security for several clients/accounts at approximately the same time. This can also be termed "blocked" or "batched" orders. Aggregated orders are effected in an attempt to obtain better execution, negotiate favorable transaction rates, or to allocate equitably among multiple client accounts should there be differences in prices, brokerage commissions or other transactional costs that might otherwise be unobtainable through separately placed orders. Our firm at times will, but is not obligated, to aggregate orders, and our firm does not receive additional compensation or remuneration as a result of aggregated transactions.

Transaction charges and/or prices can vary due to account size and/or method of receipt. To the extent that the firm determines to aggregate client orders for the purchase or sale of securities, including securities in which a related person can invest, the firm will generally do so in accordance with the parameters set forth in SEC No-Action Letter, *SMC Capital, Inc.*, or similar guidance if the jurisdiction in which the client resides provides such direction.

Please note that when trade aggregation is not allowed or infeasible and necessitates individual transactions (e.g., withdrawal or liquidation requests, odd-lot trades, etc.), an account can potentially be assessed higher costs or less favorable prices than those where aggregation has occurred.

We review firm trading processes on a periodic basis to ensure they remain within stated policies and regulation. Our clients will be informed, in advance, should trading practices change at any point in the future.

Trade Errors

The firm corrects its trade errors through an account maintained by our custodian, and the firm at times can be responsible for trading error losses that occur within a client account. Should there be a gain following the correction of a trading error, we will typically credit the client's account.

Client Referrals from Custodians

We do not receive referrals from our custodian, nor are client referrals a factor in our selection of our custodian.

Item 13 - Review of Accounts

Types of Reviews

Periodic financial “check-ups” or portfolio reviews are recommended for financial planning clients, and it is the client's responsibility to initiate these reviews. Due to the incidental nature of these services, the client can potentially be required to conduct these reviews under a new or amended engagement agreement.

Investment management services accounts are periodically reviewed throughout the year by the assigned investment advisor representative, supervisory personnel, or a qualified independent entity engaged by the firm. Additional reviews can be triggered by news or research related to a specific holding, a change in the firm's view of the investment merits of a holding, or news related to the macroeconomic climate affecting a sector or holding within that sector.

Accounts can also be reviewed when being considered for an additional holding or an increase in a current position. Account cash levels above that deemed appropriate for the investment environment, given the client's stated tolerance for risk and investment objectives, can also trigger a review.

Client Reports and Frequency

If a client has opened and maintained an investment account on their own or with our firm's assistance, they will receive account statements sent directly from mutual fund companies, transfer agents, custodians or brokerage companies where their investments are held. Our firm urges each client to carefully review these statements for accuracy and clarity, and to ask questions when something is not clear.

CLYM LLC provides portfolio reports if it is engaged to provide periodic asset allocation or investment advice, however, the firm does not provide ongoing performance reporting under its financial planning or client-traded investment services engagements.

For our Wealth Management and Investment Management services accounts our firm produces its own performance reports that are calculated using time-weighted methodologies, which will be reviewed for accuracy by Ms. York prior to delivery. The reports are intended to inform clients about their investment performance over the current period, as well as over the longer term since the account's inception; both on an absolute basis and as compared to a known benchmark.

Clients are urged to carefully review and compare account statements that they have received directly from their custodian of record with any report they receive from our firm or any other source that contains account performance information.

Item 14 - Client Referrals and Other Compensation

Beyond what had been previously disclosed in Item 12, our firm does not receive economic benefit from an external source that we recommend to you. We do not engage in solicitation activities involving unregistered persons.

If we receive or offer an introduction to a client, we do not pay or earn referral fee, nor are there established *quid pro quo* arrangements. Each client retains the option to accept or deny such referral or subsequent services.

Investment advisor representatives of the firm can hold individual membership or serve on boards or committees of professional industry associations such as NAPFA, the Financial Planning Association (FPA), or the Certified Financial Planner Board of Standards, Inc. Generally, participation in any of these entities require membership fees to be paid, adherence to ethical guidelines, as well as in meeting experiential and educational requirements. Associates' information is typically available on these organizations' websites for public view. These passive websites usually provide a means for an interested person to reach an individual planner via listed contact information.

Prospective clients locating the firm or an associated investment advisor representative via any of these venues are not actively marketed by these associations; nor do they pay more for their services than another client who is referred in another fashion, such as a personal referral from another firm client. Further, firm policy does not allow it or an employee to pay these associations for prospective client referrals, nor are there fee-sharing arrangements reflective of a solicitor engagement.

Item 15 - Custody

CLYM LLC is deemed to have custody of client funds or securities because the Firm has the authority and ability to debit its fees directly from clients' accounts. Under the Custody Rule, advisers with custody are generally required to undergo an independent verification of the assets for which the adviser has custody through an annual surprise examination by an independent certified public accountant. Advisers deemed to have custody solely as a consequence of the authority to debit fees directly from client accounts are not required to obtain an independent verification of those client funds and securities maintained by a qualified custodian.

Client funds and securities will be maintained by unaffiliated, qualified custodians (such as Schwab), banks, broker-dealers, mutual fund companies, or transfer agents; not with or by CLYM LLC, nor any of its associates. These unaffiliated entities do not supervise the firm, its agents or activities.

The firm will not accept or forward client securities (i.e., stock certificates) erroneously delivered to the firm.

At no time will a firm employee be authorized to have knowledge of a client's account access information (i.e., online 401(k), personal brokerage, or bank accounts), even for the "accommodation" of the client or their legal agent when such access might result in physical control over client assets.

At no time will the firm's fees for any single account be collected for \$500 or more for its services to be performed more than six months in advance.

Clients will be provided transaction confirmations and summary account statements sent directly from their selected service provider; not through or by CLYM LLC. Typically, these statements are provided on a monthly or quarterly basis, and as transactions occur. Clients are reminded to inform the firm if they do not receive these statements in a timely fashion. For those accounts that elect to receive electronic statements from the selected service provider, they must ensure they maintain a current electronic mail address with the service provider.

Item 16 - Investment Discretion

The firm generally provides its Investment Management services via a discretionary account agreement. Similar to a limited power of attorney, this authority allows the firm to implement investment decisions, such as buys or sells of securities, on behalf of the account without prior client authorization in order to meet the account objectives.

If an Investment Management client desires an account to be managed in a non-discretionary manner, the firm in its sole discretion has the authority to terminate the account, manage the account under the same asset-based fee, or manage the account under a higher asset-based fee. By definition and absent client written instruction to the contrary, non-discretionary account transactions do not involve those with respect to a trade execution's price or time.

Account authority will be granted through the client's execution of our client agreement and custodian account opening documents. The custodian of record will specifically limit our authority in a client account to the placement of trade orders and the request for the deduction of advisory fees.

All account restrictions, limitations, and rescissions will be made in writing by the client and approved in writing by the firm. A record will be made and retained per regulation for each of these actions.

Item 17 - Voting Client Securities

Clients can potentially receive proxies or other similar solicitations sent directly from their selected custodian or transfer agent. If the firm receives correspondence for a client relating to the voting of their securities, class action litigation, or other corporate actions, it will typically forward the correspondence to the client or another entity (i.e., client counsel, etc.) if so directed.

The firm does not vote client proxies nor offers guidance on the voting of client proxies. Clients maintain exclusive responsibility for directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted as well as making all other elections relative to mergers, acquisitions, tender offers or other events pertaining to the client's investment assets. The firm will have no power, authority, responsibility, or obligation to take any action with regard to any claim or potential claim in any bankruptcy proceeding, class action securities litigation or other litigation or proceeding relating to securities held at any time in a client account, including, without limitation, to file proofs of claim or other documents related to such proceeding, or to investigate, initiate, supervise or monitor class action or other litigation involving client assets.

Item 18 - Financial Information

Our advisory firm will not take physical custody of client assets, nor do we have the type of account authority to have such control. Fee withdrawals must be done through a qualified intermediary (e.g., custodian of record), per prior written agreement with the client, and following the client's receipt of our firm's written notice (termed "constructive custody").

Engagements with our firm do not require that we collect fees from a client of \$500 or more for our advisory services that we have agreed to perform six months or more into the future.

Neither our firm nor its management serve as general partner for a partnership or trustee for a trust in which the firm's advisory clients are either partners of the partnership or beneficiaries of the trust.

The firm and its management do not have a financial condition likely to impair its ability to meet commitments to clients, nor has the firm and its management been the subject of a bankruptcy petition.

Due to the nature of our firm's advisory services and operational practices, an audited balance sheet is not required nor included in this brochure.

Item 19 - Requirements for State-Registered Advisers

A. Principal Executive Officer

Carmel York, MSFP

Year of Birth: 1968

College/University:

M.S. Financial Planning (MSFP) - Golden Gate University

B.A. Political Science - Texas Tech University

Certification Program in Personal Financial Planning - Golden Gate University Graduate Certificate Program

Securities Registrations - NASAA Series 65/Uniform Investment Advisor Law Examination1

B. Outside Business Activity

Investment advisor representatives are required to disclose outside business activities that account for a significant portion of their time or income, or that have the potential to present a conflict of interest with their advisory activities.

Ms. York is not registered, nor has an application pending to register, as a registered representative of a broker/dealer or associated person of a futures commission merchant, commodity pool operator, or commodity trading advisor. She does not receive commissions, bonuses or other compensation based on the sale of securities, including that as a registered representative of a broker/dealer or the distribution or service ("trail") fees from the sale of mutual funds.

Ms. York serves as VP-Sales for OptiFunder, LLC, a privately-held enterprise software firm. Ms. York is compensated for this role. She does not hold stock in this entity and is not considered an insider to an issuer of a security. The firm will not offer recommendations to clients or prospective clients with respect to holdings or hedging strategies involving OptiFunder, LLC or any of its derivative securities.

For additional information relating to Carmel York, MSFP, please refer to his brochure supplement (Part 2B of Form ADV).

C. Performance-based Fees

CLYM LLC is not compensated for advisory services with performance-based fees.

D. Disclosure Events

CLYM LLC, as a state registered investment adviser, is required to disclose all material facts regarding any legal or disciplinary event. Neither Ms. York nor the Firm have any legal or disciplinary events required to be disclosed under this Item.

E. Relationship or Arrangement with Any Issuer of Securities

CLYM LLC does not have any relationships or arrangements with any issuer of securities.

F. Disclosure of Material Conflicts of Interest

All material conflicts of interest under CCR Section 260.238(k) have been disclosed about CLYM LLC, its representatives and employees, which could be reasonably expected to impair the rendering of unbiased and objective advice.

Business Continuity Plan

Our firm maintains a business continuity and succession contingency plan that is integrated within the organization to ensure it appropriately responds to events that pose a significant disruption to its operations. A statement concerning the current plan is available at www.clymwealth.com/cdocs/CLYM_BCP_Disclosure_Statement.pdf.



CLYM LLC
266 Reservation Road F306
Marina, CA 93933
(831)309-9600
CRD-318567
www.clymwealth.com

Carmel York, MSFP

CRD-2799278
Principal
Chief Compliance Officer
Investment Advisor Representative

Form ADV Part 2B Brochure Supplement March 15, 2024

This brochure provides information about Carmel York which supplements the CLYM LLC Form ADV Part 2A firm brochure that is referenced in the preceding pages. If you have any questions about the contents of this supplement, please contact Ms. York by telephone at (831) 309-9600. Additional information about CLYM LLC is available on the California Secretary of State website at www.sos.ca.gov/business-programs.

Item 2 - Educational Background and Business Experience

Regulatory guidance requires the firm to disclose relevant post-secondary education and professional training for each principal executive and associate of the firm, as well as their business experience for at least the most recent five years.

Principal Executive Officers and Management Persons

Principal/Member Manager/Chief Compliance Officer (Supervisor)/Investment Advisor Representative

Carmel York

Year of Birth: 1968 / CRD # 2799287

Educational Background and Business Experience

Educational Background

M.S. Financial Planning (MSFP) - Golden Gate University

B.A. Political Science, Texas Tech University

Certification Program in Personal Financial Planning - Golden Gate University Graduate Certificate Program
Securities Registrations - NASAA Series 65/Uniform Investment Advisor Law Examination¹

Business Experience

Principal - CLYM LLC, Marina, CA (December 2021-Present)

VP National Sales - OptiFunder, LLC., St Louis, MO (Enterprise Software) (2021-Present)

SVP Mortgage and Institutional Finance - Western Alliance Bank , Phoenix, AZ (commercial banker)
(2018-2019)

SVP-Managing Director - NattyMac LLC, St. Petersburg, FL (commercial banker) 2013-2017

Item 3 - Disciplinary Information

Registered investment advisors are required to disclose certain material facts about its associated personnel regarding any legal or disciplinary events, including criminal or civil action in a domestic, foreign or military court, or any proceeding before a state, federal or foreign regulatory agency, self-regulatory organization, or suspension or sanction by a professional association for violation of its conduct rules, that would be material to your evaluation of each officer or a supervised person providing investment advice. Ms. York has not been the subject of any such event.

Item 4 - Other Business Activities

Ms. York is not registered, nor has an application pending to register, as a registered representative of a broker/dealer or associated person of a futures commission merchant, commodity pool operator, or commodity trading advisor. She does not receive commissions, bonuses or other compensation based on the sale of securities, including that as a registered representative of a broker/dealer or the distribution or service ("trail") fees from the sale of mutual funds.

Neither CLYM, LLC , Ms. York, nor any of its representatives, have any relationship or arrangement with a related person that is material to its advisory business.

Ms. York serves as VP-Sales for OptiFunder, LLC, a privately-held enterprise software company. Ms. York is compensated for this role. She does not hold stock in this entity and is not considered an insider to an issuer of a security. The firm will not offer recommendations to clients or prospective clients with respect to holdings or hedging strategies involving OptiFunder, LLC or any of its derivative securities.

Item 5 - Additional Compensation

Neither CLYM LLC nor Ms. York are compensated for advisory services involving performance-based fees. Our firm also prohibits employees from accepting or receiving additional economic benefit, such as sales awards or other prizes, for providing advisory services to its clients.

Item 6 - Supervision

Ms. York serves as the firm's Chief Compliance Officer. Because supervising one's self poses a conflict of interest, the firm has adopted policies and procedures to mitigate this conflict, and can use the services of unaffiliated professionals to ensure the firm's oversight obligations are met. Questions relative to the firm, staff, its services, or this Form ADV Part 2 can be made to the attention of Ms. York at (831) 309-9600.

Additional information about the firm, other advisory firms, or associated investment advisor representatives is available on the Internet at www.adviserinfo.sec.gov. The business and disciplinary history, if any, of an investment advisory firm and its representatives can also be obtained by calling the California Department of Financial Protection and Innovation at (866) 275-2677.

Item 7- Requirements for State-Registered Advisers

There have been neither arbitration awards nor any awards where the firm or Ms. York has been found liable in any civil, self-regulatory or administrative proceeding. Neither the firm nor Ms. York has been the subject of a bankruptcy petition.

Important Information about Industry Designations and Examinations

¹ NASAA examinations are "criterion based;" candidates who pass the exam are considered to have met the minimum competency level. The completion of a securities industry examination does not constitute or imply a person is "approved" or "endorsed" by a securities regulatory organization or state securities commissioner.

