



Relativity

Capital Advisors

Relativity Capital Advisors, LLC

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(706) 352-4112

relativitycap.com

Disclosure Brochure

March 28, 2018

This brochure provides information about the qualifications and business practices of Relativity Capital Advisors, LLC. If you have any questions about the contents of this brochure, please contact us at (706) 352-4112. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Relativity Capital Advisors, LLC is a registered investment adviser. Registration of an investment adviser does not imply any level of skill or training. Additional information about Relativity Capital Advisors, LLC also is available on the SEC's website at www.adviserinfo.sec.gov. Our CRD Number is 281942.

Material Changes (Item 2)

The last annual update of Relativity Capital Advisors, LLC’s disclosure brochure was made on March 24, 2017, the following material changes have been made:

- Our firm’s address changed in November 2017.

We will send our clients (“you, your, yours”) an annual summary of any material changes to our brochure by April 29th of each year. We may also provide updated disclosure information about material changes on a more frequent basis. Any summaries of changes will include the date of our last annual update of our brochure.

If you would like a copy of our current disclosure brochure, you may request one by contacting us at (706) 352-4112 or jdlackey@relativitycap.com. We will provide you with a new brochure at any time without charge.

Additional information about our company is available via the SEC’s

website:
www.adviserinfo.sec.gov.

The SEC’s website also provides information about any persons affiliated with Relativity Capital who are registered as investment adviser representatives of Relativity Capital. Information on our investment adviser representatives who work with your account(s) can be found in our brochure supplements.

Table of Contents

(Item 3)

<i>Advisory Business</i>	2
<i>Fees and Compensation</i>	2
<i>Performance Based Fees</i>	5
<i>Types of Clients</i>	6
<i>Methods of Analysis, Investment Strategies and Risk of Loss</i>	6
<i>Disciplinary Information</i>	7
<i>Other Financial Industry Activities and Affiliations</i>	7
<i>Code of Ethics; Participation or Interest in Client Transactions and Personal Trading</i>	8
<i>Brokerage Practices</i>	9
<i>Review of Accounts</i>	11
<i>Client Referrals and Other Compensation</i>	11
<i>Custody</i>	11
<i>Investment Discretion</i>	12
<i>Voting Client Securities</i>	12
<i>Financial Information</i>	12
<i>Requirement for State Registered Advisers</i>	12
<i>Brochure Supplements</i>	14

CRD Number: 281942

Advisory Business (Item 4)

Relativity Capital Advisors is a limited liability company organized under the laws of the state of Georgia. Jennifer Driver Lackey and Gordon Thomas Lackey, Jr. founded the firm in 2015 and are the principal owners of the firm. Information about their backgrounds and qualifications can be found in the supplement at the end of this brochure.

We offer personalized investment advisory services and financial planning services on a continuous basis. We will meet with you to determine your investment goals and objectives, focusing on your current and future financial needs. After your initial complimentary consultation, if you choose to move forward with us, we will prepare an advisory contract tailored to your specific needs that will be signed by both you and one of us.

We offer portfolio management services on a discretionary or non-discretionary basis. Once we have determined your risk tolerance, investment objectives and time horizon (at a minimum), a portfolio model is chosen based upon the investment strategy that best suits your situation. You should notify us promptly if there are any changes in your financial situation or investment objectives. You should also notify us if you wish to impose any reasonable restrictions upon the management of your account(s).

As of December 31, 2017, we managed approximately \$11.6 million in client assets where we made all of the investment decisions (discretionary assets) and

approximately \$2.1 million in client assets were managed where our clients made the investment decisions based upon our recommendations (non-discretionary assets).

Fees and Compensation (Item 5)

Investment Advisory Services Fees – Schwab and Fidelity Accounts

We offer our portfolio management services on a fee-only basis. Our fee is calculated based upon the market value of the assets in your account on the last day of the previous quarter.

Broker-dealers and other financial institutions that hold client accounts are referred to as custodians (hereinafter referred to as “custodian”). Your custodian determines the values of the assets in your portfolio.

Fees for the initial quarter are based on the value of your cash and securities on the date the custodian receives them and are prorated based upon the number of calendar days in the calendar quarter that our agreement is in effect. Our fee schedules are described below:

Schwab:

<u>Discretionary Assets Under Management</u>	<u>Annual Advisory Fee¹</u>
\$0 to \$499,999	1.75%
\$500,000 to \$999,999	1.50%
\$1,000,000 to \$2,999,999	1.25%
Above \$3,000,000	Negotiable

¹ All fees are negotiable at our sole discretion.

<u>Non-discretionary Assets Under Management</u>	<u>Annual Advisory Fee¹</u>
\$0 to \$249,999	1.50%
\$250,000 to \$499,999	1.25%
\$500,000 to \$999,999	1.00%
\$1,000,000 to \$2,999,999	0.75%
Above \$3,000,000	Negotiable

¹ All fees are negotiable at our sole discretion.

Fidelity Tax Exempt Management and Base Plan:

<u>Discretionary Assets Under Management</u>	<u>Annual Advisory Fee¹</u>
\$0 to \$2,999,999	1.00%
Above \$3,000,000	Negotiable

¹ All fees are negotiable at our sole discretion.

Minimum requirements pertaining to account balance and account fees may be negotiable depending on the complexity and level of sophistication of your plan. We reserve the right to change the advisory fees payable by you with thirty (30) days written notice. During the 30 days, you have the right to terminate the management agreement by written instruction. If you do not terminate your agreement, the new advisory fee schedule will take effect.

Your asset-based fee is payable to us quarterly in advance and will be debited directly from your account. You must authorize us in writing to have the custodian pay us directly by debiting your account.

One-fourth of the annual advisory fee is charged each calendar quarter. We send a statement that includes the value of your investments, our advisory fee, and how it is

calculated. Your custodian also provides you with statements that show the amount paid directly to us. You should compare the statement we send to you to your custodian's statement and verify the calculation of our fees. Your custodian does not verify the accuracy of the fee calculations.

Quarterly Fee Calculation

$$\text{Assets under Management} \times \text{Annual Fee} \div 4 = \text{Quarterly Fee}$$

In addition to our fee, you may be required to pay other charges such as:

- custodial fees,
- brokerage commissions,
- transaction fees,
- internal fees and expenses charged by mutual funds or exchange traded funds ("ETFs"), and
- other fees and taxes on brokerage accounts and securities transactions.

None of these fees are paid to or are shared with us.

Mutual fund companies, ETFs, and variable products insurers charge internal fees and expenses for their products. The fees and expenses are in addition to any advisory fees charged by us. Complete details of the internal fees and expenses are explained in the prospectuses for each investment. You are strongly encouraged to read these explanations before investing any money. You may ask us if you have any questions about fees and expenses.

If you purchase mutual funds through the custodian, you may pay a transaction fee that would not be charged if the transactions were made directly through the mutual fund company. Also, mutual funds held in accounts at brokerage firms may pay internal fees that are different from funds held at the mutual fund company.

You must pay our advisory fees in advance of receiving our services. If before the end of the billing period either one of us terminates the advisory agreement, written notice will be required. Upon receipt of written notice, any unearned fees that were deducted from your account will be returned to you. The prorated amount refunded to you is calculated by dividing the most recent advisory fee you paid by the total number of days in the quarter. This daily fee is then multiplied by the number of calendar days in the quarter that our agreement was in effect. This amount, which equals the amount we earned for the partial quarter, is subtracted from the total fee you paid in advance to determine your refund. Your prorated refund will be paid back directly to the account it was originally debited from.

Investment Advisory Services Fees – Interactive Brokers Accounts

We offer our portfolio management services on a fee-only basis. Our fee is handled on an automatic billing through Interactive Brokers. The fee is determined at the time of your account's registration. In the case of fee increases, you will be required to acknowledge the fee increase with a signature.

Upon account registration, our fee is entered as an annualized percentage, applied on a daily basis. Upon completion of the account registration, there is a blanket authorization for your fee to be processed in this manner. Each market close, Interactive Brokers determines the values of the assets in your account, calculates the fee and automatically bills the account for that day's fee. We do not calculate or debit fees for any accounts custodied at Interactive Brokers.

Our fee for Interactive Brokers Discretionary accounts is 1.75% annual management fee. Our fee for Interactive Brokers non-discretionary accounts is 1.5% annual management fee. All fees are negotiable at our sole discretion.

In addition to our fee, you may be required to pay other charges such as:

- custodial fees,
- brokerage commissions,
- transaction fees,
- internal fees and expenses charged by mutual funds or exchange traded funds ("ETFs"), and
- other fees and taxes on brokerage accounts and securities transactions.

None of these fees are paid to or are shared with us.

Mutual fund companies, ETFs, and variable products insurers charge internal fees and expenses for their products. The fees and expenses are in addition to any advisory fees charged by us. Complete details of the internal fees and expenses are explained in the prospectuses for each investment. You

are strongly encouraged to read these explanations before investing any money. You may ask us if you have any questions about fees and expenses.

If you purchase mutual funds through the custodian, you may pay a transaction fee that would not be charged if the transactions were made directly through the mutual fund company. Also, mutual funds held in accounts at brokerage firms may pay internal fees that are different from funds held at the mutual fund company.

Financial Planning Services Fees

Our financial planning fees are based on an hourly or fixed fee arrangement based on the schedule below and as agreed upon by you and us. Fees are negotiable and will vary depending on the complexity of your situation and the services we will provide. Once we have agreed on a fee, 50% is due at the time that we put the agreement in place and the remainder will be due when your plan is complete and reviewed with you. At no time will we take a deposit of more than \$500 more than six months in advance of completing the work.

Fixed Fee (Maximum)

\$5,000 - clients with a net worth up to \$1,000,000

\$10,000 - clients with a net worth of \$1,000,001 to \$5,000,000

Negotiable - clients with a net worth of greater than \$5,000,000

Hourly Fee: \$0 to \$500 per hour

Our hourly fees will be due on a monthly

basis on the last business day of each calendar month or in full upon completion of the service, whichever comes first.

Please be sure to read the section entitled “Brokerage Practices,” which follows later in this brochure.

Performance-Based Fees (Item 6)

Performance-based fees are investment advisory fees which are based on a share of the capital gains on, or capital appreciation of, client assets and are designed to give a portion of the returns of an investment to the investment adviser as a reward for positive performance. The fee is generally a percentage of the profits made on the investments. The program fee is structured as follows:

- An annual Base Fee of 1.5% will be charged as a percentage of the assets under management. Upon account registration with Interactive Brokers, our base fee is entered as an annualized percentage, applied on a daily basis. Each market close, Interactive Brokers determines the values of the assets in your account, calculates the fee and automatically bills the account for that day’s fee.
- The performance-based fee is calculated on a quarterly basis in arrears based on the Total Portfolio Value of the previous quarter-end. The performance-based fee is calculated based on a percentage of the net profits of the Total Portfolio Value of the account at the end of each quarter (adjusted for cash flows in and out of account and net of

fees). Relativity Capital's performance-based fee is 15% of the allocable share of net profits above the "high-water mark" set for the account. No performance-based fees will be assessed unless the account exceeds the "high-water mark" which is adjusted for deposits, withdrawals and fees. Once a new high-water mark is established, another lesser high-water mark cannot be established.

- Upon completion of the account registration, there is a blanket authorization for your fee to be processed by Interactive Brokers in the manner described above. We do not calculate or debit fees for any accounts custodied at Interactive Brokers.

In the event of termination, Relativity Capital Advisors is only paid for the days that we are managing the account. Fees are subject to change with thirty days notice.

This portfolio option is designed only for a Qualified Investor as defined by the SEC.

We manage both accounts that are charged a performance-based fee and accounts that are charged an asset-based fee. Performance-based fees may create an incentive for us to favor accounts for which we receive a performance-based fee over accounts where we do not. Performance-based compensation may also create an incentive for us to recommend an investment that may carry a higher degree of risk for the client. However, trades in all accounts are reviewed on a regular basis to monitor the fairness and suitability of the

transactions.

Types of Clients *(Item 7)*

We will provide investment advisory services to individuals, high net worth individuals, trusts, estates, charitable organizations, corporations, other business entities and institutional clients.

As a condition for starting and maintaining an advisory relationship, we generally require a minimum account size of \$250,000. We, at our sole discretion, may accept clients with smaller accounts based upon certain factors including anticipated future earning capacity, anticipated future additional assets, account composition, related accounts, and pre-existing client relationships. We may consider the portfolios of your family members to determine if your account meets the minimum size requirement.

Methods of Analysis, Investment Strategies and Risk of Loss *(Item 8)*

We will select specific investments for your portfolios through the use of technical and fundamental analysis.

Technical analysis is a method of evaluating securities by analyzing statistics generated by market activity, such as past prices and volumes. Technical analysts do not attempt to measure a security's intrinsic value, but instead used charts and other tools to identify patterns that can suggest future activity.

Fundamental analysis is a method of evaluating a company that has issued a

security by attempting to measure the value of its underlying assets. It entails studying overall economic and industry conditions as well as the financial condition and the quality of the company's management. Earnings, expenses, assets and liabilities are all important in determining the value of a company. The value is then compared to the current price of the issuing company's security to determine whether to purchase, sell or hold the security.

We will use strategies that include core positions for longer holding periods along with some shorter term trend based purchases and sales. Our strategies may include the use of options and selling securities within 30 days of their purchase. Some of the shorter term purchases and sales can include exposure to hedges and inverse funds designed to increase downside protection. All portfolios are reviewed regularly to make sure the funds included still fit our strategies' objectives. Securities can be sold for various reasons, such as change in market outlook, change in strategy, loss of relative strength or a breach in the absolute loss threshold of the position.

You may place reasonable restrictions on the strategies to be employed in your portfolio and the types of investments to be held in your portfolio.

Although we manage your portfolio in a manner consistent with your risk tolerances, there can be no guarantee that our efforts will be successful. You should be prepared to bear the risk of loss.

All investments involve risks that can result in loss, including:

- loss of principal,
- a reduction in earnings (including interest, dividends and other distributions), and
- loss of future earnings.

These risks may include:

- market risk,
- interest rate risk,
- issuer risk, and
- general economic risk.

Additionally, frequent trading can affect investment performance, particularly through increased brokerage and other transaction costs and taxes. Also, selling options without a covering position can cause a loss greater than the amount invested and using leveraged funds or margin borrowing can also increase exposure to market risk and cause greater loss.

Disciplinary Information (Item 9)

We have not been the subject of any disclosable legal or disciplinary events that we believe to be material to your evaluation of our business or the integrity of our management.

Other Financial Industry Activities and Affiliations (Item 10)

Neither Relativity Capital nor its representatives are registered as a broker-dealer or as representatives of a broker-dealer. Neither Relativity Capital nor its representatives are registered as a Futures

Commission Merchant, Commodity Pool Operator or Commodity Trading Advisor. G. Thomas Lackey, Jr and Jennifer Driver Lackey are related to Glen J. Barber and Jennifer Lackey Barber, both registered representatives of Cape Securities, a broker-dealer in the state of Georgia. This relationship does not create a material conflict of interest for clients. Relativity Capital does not direct clients to third party money managers.

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

We have adopted a *Code of Ethics* (“*Code*”) to address the securities-related conduct of our advisory representatives. The *Code* includes our policies and procedures developed to protect your interests in relation to the following:

- the duty at all times to place your interests ahead of ours;
- that all personal securities transactions of our advisory representatives be conducted in a manner consistent with the *Code* and avoid any actual or potential conflict of interest, or any abuse of an advisory representative’s or employee’s position of trust and responsibility;
- that advisory representatives may not take inappropriate advantage of their positions;
- that information concerning the identity of your security holdings and financial circumstances are confidential; and
- that independence in the investment

decision-making process is paramount.

We will provide a copy of the *Code* to you or any prospective client upon request.

We may buy or sell securities for our firm that we also recommend to clients. Our advisory representatives are also permitted to buy or sell the same securities for their personal and family accounts that are bought or sold for your account(s). The personal securities transactions by us may raise potential conflicts of interest when they trade in a security that is:

- owned by you or
- considered for purchase or sale for you.

We have adopted policies and procedures that are intended to address these conflicts of interest. These policies and procedures:

- require our firm and advisory representatives to act in your best interest,
- prohibit favoring one client over another, and
- provide for the review of transactions to discover and correct any same-day trades that result in our firm or advisor representative receiving a better price than a client.

Our firm and our advisory representatives must follow our procedures when purchasing or selling the same securities purchased or sold for you.

Brokerage Practices (Item 12)

We may recommend that the custodian for your account be Charles Schwab & Co., Inc. (“Schwab”), Fidelity Brokerage Services, LLC (“Fidelity”) or Interactive Brokers, LLC (“IB”). Schwab, Fidelity and/or IB will assist us in servicing your account. We are independently owned and operated and are not affiliated with Schwab, Fidelity or IB. Our use of these custodians is, however, a beneficial business arrangement for us and them. Information regarding the benefits of this relationship is described below.

In recommending Schwab, Fidelity and/or IB as custodian and as the securities brokerage firm responsible for executing transactions for your portfolios, we consider at a minimum Schwab, Fidelity and/or IB’s:

- existing relationship with us,
- financial strength,
- reputation,
- reporting capabilities,
- execution capabilities,
- pricing, and
- types and quality of research.

The determining factor in the selection of Schwab, Fidelity or IB to execute transactions for your accounts is not the lowest possible transaction cost, but whether Schwab, Fidelity or IB can provide what is in our view the best qualitative execution for your account.

Schwab, Fidelity and IB provide us with access to their institutional trading and custody services, which includes:

- brokerage,
- custody,
- research, and
- access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

We are not required to affect a minimum volume of transactions or maintain a dollar amount of client assets to receive these services.

Schwab, Fidelity or IB do not charge separately for holding our clients accounts, but may be compensated by you through other transaction-related fees associated with securities transactions it executes for your accounts.

Schwab, Fidelity and IB may also make available to us other products and services that benefit us, but may not benefit you directly. Some of these products and services assist us in managing and administering our client accounts, such as software and other technology that:

- provide access to account data such as:
 - duplicate trade confirmations,
 - bundled duplicate account statements, and
 - access to an electronic communication network for client order entry and account information;
- facilitate trade execution, including:
 - access to a trading desk serving advisory participants exclusively and

- access to block trading which provides the ability to combine securities transactions and then allocate the appropriate number of shares to each individual account;
- provide research, pricing information and other market data;
- facilitate payment of our fees from client accounts;
- assist with back-office functions, record keeping and client reporting; and
- receipt of compliance publications.

Schwab and Fidelity excluding IB also make available to us other services intended to help us manage and further develop our business. These services may include:

- consulting,
- publications and conferences on practice management,
- information technology
- business succession
- regulatory compliance, and
- marketing.

Schwab and Fidelity excluding IB may also make available or arrange for these types of services to be provided to us by independent third parties. Schwab and Fidelity may discount or waive the fees it would otherwise charge for some of the services it makes available to us. It may also pay all or part of the fees of a third party providing these services to us. Thus, we receive economic benefits as a result of our relationship with Schwab and Fidelity, because we do not have to produce or

purchase the products and services listed above.

Because the amount of our compensation or the products and services we receive may vary depending on the custodian we recommend to you, we may have a conflict of interest in making that recommendation. Our recommendation of specific custodians may be based in part on the economic benefit to us and not solely on the nature, cost or quality of custody and brokerage services provided to you and our other clients. We nonetheless strive to act in your best interests at all times.

Commissions and other fees for transactions executed through Schwab, Fidelity and/or IB may be higher than commissions and other fees available if you use another custodian or broker/dealer firm to execute transactions and maintain custody of your account. We believe, however, that the overall level of services and support provided to our clients outweighs the benefit of possibly lower transaction costs which may be available under other brokerage arrangements.

Many of the services described above may be used to benefit all or a substantial number of our accounts, including accounts not maintained at Schwab, Fidelity or IB. We do not attempt to allocate these benefits to specific clients. You may direct us in writing to use a particular broker-dealer to execute some of all of the transactions for your account. If you do so, you are responsible for negotiating the terms and arrangements for the account with that broker-dealer. We may not be able to negotiate commissions, obtain volume

discounts, or best execution. In addition, under these circumstances, a difference in commission charges may exist between the commissions charged to clients who direct us to use a particular broker or dealer and other clients who do not direct us to use a particular broker or dealer.

Review of Accounts (Item 13)

All client accounts will be monitored on an ongoing basis with a formal review conducted at least annually or as agreed upon with you. The reviews focus on the consistency of portfolio investments with your stated objectives and risk tolerances. Reviews also consider investment restrictions requested, investment time horizons, liquidity needs, tax considerations and other circumstances unique to your situation.

On a quarterly basis, the performance of your account(s) is reviewed to monitor consistency with market benchmarks that we deem applicable. Account reviews may also be triggered by other factors such as changes in general economic and market conditions, known changes in your financial situation, and large deposits or withdrawals from your account(s). Gordon Thomas Lackey, Jr. and/or Jennifer Driver Lackey are responsible for reviews.

You will receive statements from the custodian of your account(s) at least quarterly. These statements identify your current investment holdings, the cost of each of those investments, and their current market values. You will also receive performance analysis reports prepared by us which describe the returns realized on the

investments in your account(s).

Client Referrals and Other Compensation (Item 14)

We receive certain economic benefits as a result of our participation in Schwab and Fidelity's institutional programs. Those benefits are described in detail in the preceding section entitled "Brokerage Practices."

We may directly compensate persons or firms for client referrals, provided that those persons are qualified and have entered into a written agreement with us. If you have been referred to us, you will be provided full disclosure of the compensation paid to the solicitor. These payments will be a portion of the fee charged by us and will not result in an increase in the amount of the fee paid by you. Any referral arrangement will comply with applicable laws and regulations that govern the nature of the service provided.

Custody (Item 15)

We are deemed to have custody because we debit asset management fees directly from your account. You must authorize us in writing to have the custodian pay us directly by debiting your account. You will receive statements from the custodian that holds your investment account on at least a quarterly basis. The custodial statements are the official record of your account. We urge you to carefully review these statements and compare them to the quarterly invoice and reports for your account(s) that we send you. You should verify that the transactions in your account

are consistent with your investment goals and the objectives for your account. We also encourage you to contact your advisory representative or our Chief Compliance Officer should you have any questions or concerns regarding your account.

Investment Discretion (Item 16)

We will offer our advisory services on a discretionary basis. This means that we do not need advance approval from you to determine the type and amount of securities to be bought and sold for your accounts. We do not, however, have the ability to choose the broker-dealer through which transactions will be executed or to negotiate brokerage commissions. Additionally, we do not have the ability to withdraw funds from your account (other than to withdraw our advisory fees which may only be done with your prior written authorization.) This discretion is used in a manner consistent with the stated investment objectives for your account, if you have given us written authorization to do so. We only exercise discretion in accounts where we have been authorized by you. This authorization is typically included in the investment advisory agreement you enter into with us.

Voting Client Securities (Item 17)

We will not take any action or give any advice with respect to voting of proxies solicited by or with respect to the issuers of securities in which your accounts may be invested. In addition, we do not take any action or give any advice with respect to any securities held in any accounts that are named in or subject to class action lawsuits.

We will, however, forward to you any information received by us regarding proxies and class action legal matters involving any securities held in your accounts.

Financial Information (Item 18)

We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to you and we have not been the subject of a bankruptcy proceeding.

Requirements for State-Registered Advisers (Item 19)

As a state registered adviser, Relativity Capital is required to supply the additional information listed below:

The following persons are executive officers and management persons of Relativity Capital Advisors, LLC:

Jennifer Driver Lackey, Partner/CCO

Formal Education:

- University of Georgia, BBA Banking and Finance, 2001

Business Background:

- Relativity Capital Advisors, LLC – Member/Partner (10/15 – Present)
- Barber Lackey Financial Group, LLC – CCO/Office Manager (08/01 – 12/16)
- Western International Securities, Inc. – Registered Principal (03/08 – 10/08)
- NRP Financial, Inc. – Registered Principal (04/07 – 04/08)

- Oberlin Financial Corp. – Registered Principal (01/06 – 04/07)
- FSC Securities Corporation – Registered Representative (01/02 – 01/06)

- FSC Securities Corporation – Registered Principal (04/02 – 01/06)
- J.P. Atkinson and Associates – Account Executive (1994 – 1999)

Gordon Thomas Lackey, Jr., Partner

Formal Education:

- University of Georgia, BBA Finance, 1994
- Oglethorpe University, Certified Financial Planner™ (CFP®), 1998
- The Institute of Business & Finance, Certified Fund Specialist (CFS), 2001
- The Market Technicians Association, Chartered Market Technician (CMT), 2006

Business Background:

- Relativity Capital Advisors, LLC – Member/Partner (10/15 – Present)
- Barber Lackey Financial Group, LLC – Member/Partner (10/99 – 12/16)
- Presidium Capital, LLC – Member/Partner (12/13-04/15)
- Western International Securities, Inc. – Registered Principal (03/08 – 10/08)
- NRP Financial, Inc. – Registered Principal (04/07 – 04/08)
- Oberlin Financial Corp. – Registered Principal (01/06 – 04/07)

Relativity Capital is not actively engaged in any business other than giving investment advice.

Relativity Capital is compensated for performance-based fees for certain client accounts. Explanation of how these fees are calculated and other information regarding compensation of these types of fees has already been disclosed in the “Performance-Based Fees” section.

Relativity Capital has not been the subject of any disclosable legal or disciplinary events that we believe to be material to your evaluation of our business or the integrity of our management.

Relativity Capital does not have any relationships or arrangements with any issuers of securities besides what we have already disclosed in the “Other Financial Industry Activities and Affiliations” section.

G. Thomas Lackey, Jr.

Individual CRD # 2553380

Relativity Capital Advisors, LLC

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Greensboro, GA

30642

(404) 317-1457

Brochure Supplement

November 14, 2017

This brochure supplement provides information about G. Thomas Lackey, Jr. that supplements the Relativity Capital Advisors, LLC brochure. You should have received a copy of that brochure. Please contact Jennifer D. Lackey, CCO, if you did not receive Relativity Capital Advisors, LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about G. Thomas Lackey, Jr. is available on the SEC's website at www.adviserinfo.sec.gov.

Educational Background and Business Experience

G. Thomas Lackey, Jr., CMT, CFP®, CFS®



Year of birth: 1971

Formal education:

- University of Georgia, BBA Finance, 1994
- Oglethorpe University, Certified Financial Planner™ (CFP®), 1998
- The Institute of Business & Finance, Certified Fund Specialist (CFS), 2001
- The Market Technicians Association, Chartered Market Technician (CMT), 2006

Business background:

- Relativity Capital Advisors, LLC – Member/Partner (10/15 – Present)
- Barber Lackey Financial Group, LLC – Member/Partner (10/99 – 12/16)

- Presidium Capital, LLC – Member/Partner (12/13-04/15)
- Western International Securities, Inc. – Registered Principal (03/08 – 10/08)
- NRP Financial, Inc. – Registered Principal (04/07 – 04/08)
- Oberlin Financial Corp. – Registered Principal (01/06 – 04/07)
- FSC Securities Corporation – Registered Principal (04/02 – 01/06)
- J.P. Atkinson and Associates – Account Executive (1994 – 1999)

Mr. Lackey maintains the following professional designations:

Chartered Market Technician (CMT) program is a certification process in which candidates are required to demonstrate proficiency in a broad range of technical analysis subjects. Administered by the Accreditation Committee of the Market Technicians Association (MTA), Inc., the Program consists of three levels. CMT Level 1 and CMT Level 2 are multiple choice exams while CMT Level 3 is in essay form.

The objectives of the CMT Program are:

- To guide candidates in mastering a professional body of knowledge and in developing analytical skills;

- To promote and encourage the highest standards of education; and
- To grant the right to use the professional designation of Chartered Market Technician (CMT) to those members who successfully complete the Program and agree to abide by the MTA Code of Ethics.

In order to be granted your CMT designation, you must meet the following requirements:

- Successful completion of all three (3) levels of the CMT Exam.
- Have obtained 'Member Status' within the MTA.
- Have been gainfully employed in a professional analytical or investment management capacity for a minimum period of three (3) years and must be regularly engaged in this capacity at the time of successfully passing all three (3) levels of the CMT Exam.

The Chartered Market Technician (CMT) program offers a structured approach to study technical analysis and ensure all key areas are covered. The CMT can help to open doors that may lead to job opportunities. The CMT demonstrates to Wall Street that you are a professional in the field of technical analysis. For those seeking a more traditional Wall Street analyst job, passing the first two CMT exams

provides a significant step towards attaining the "Registered Research Analyst" designation from FINRA. Even if you're not looking for a FINRA exemption, but rather just to learn technical analysis, the CMT Program offers a structured, organized, and comprehensive way to do so.

The MTA is pleased to announce that it will now be offering a voluntary Continuing Education (CE) Program for our members. Credits for the CE Program will come from nearly all the MTA's member benefits: attending seminars, chapter meetings, submitting articles, viewing a webcast, etc. You will find that your current level of involvement with the MTA will most likely satisfy your CE requirements.

These requirements are intended to encourage professionals to expand their knowledge base and stay up-to-date on new developments in the field of Technical Analysis. You will find a complete list of recognized credits within this page. Rest assured that the method of delivery and recording of CE Credits will be user friendly and simple to understand.

It is strongly believed that a continuing education program would strengthen the CMT designation in the eyes of the membership and, most importantly, with the financial community. In order to meet the CE Program requirements, one must complete 15 CE Credits by the end of the calendar year. 1 CE Credit is defined as 1 hour.

Certified Financial Planner™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

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

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas

include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;

- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board’s *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

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

- Continuing Education – Complete 30 hours of continuing education hours

every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and

- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

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

Certified Fund Specialist® (CFS); Over 12,000 mutual funds are offered in the United States alone. There are more than three times as many mutual funds as there are stocks listed on the NYSE. Over 30% of all households own shares of at least one fund. Confused by the ever-increasing number of investments available and concerned about achieving financial security, more and more people are seeking the advice of professionals. Their concerns and increasing

awareness about mutual funds and annuities will motivate them to seek an advisor who has the credibility of a sound education and a commitment to professionalism - the Certified Fund Specialist®.

With mutual funds training, a Certified Fund Specialist® is able to evaluate and compare financial measurements and benchmarks when constructing a portfolio. Modern portfolio theory (MPT) is a key part of the program; its components are broken down and detailed in terms the advisor can easily understand and convey to a client. Armed with MPT and other selection criteria learned as part of the mutual fund education, a suitable and efficient portfolio using closed-end, exchange-traded, and open-end funds can be derived.

The CFS® course, exams, and case study highlight what the practitioner faces daily. The course consists of six modules, designed to be completed in 15 weeks. Students of the course will gain mutual fund and related knowledge plus an understanding of the uses of different investment vehicles in their financial advising practice. Some highlighted areas of course study are asset class descriptions, historical returns and risk; mutual fund costs; fund management and selection; time value analysis and market indicators; REITs, ETFs, CEFs, UITs and structured notes; risk

measurements and minimization; fund and personal tax issues; and modern portfolio theory. There are three non-cumulative exams, each based on two modules and consisting of 50 multiple-choice questions, and one written case study based on a one-page fact pattern about a hypothetical client who has come to the advisor with questions.

Disciplinary Information

G. Thomas Lackey, Jr. has not been the subject of any disclosable legal or disciplinary event.

Other Business Activities

Mr. Lackey is not engaged in any business activities other than those related to Relativity Capital Advisors, LLC.

Additional Compensation

Mr. Lackey does not receive any additional compensation related to the advisory services provided to you.

Supervision

G. Thomas Lackey, Jr. is a managing member of Relativity Capital Advisors, LLC. Mr. Lackey is required to adhere

to the processes and procedures as described in our firm's Code of Ethics. His advice to you will be monitored by performing the following reviews:

- A review of relevant account opening documentation when the relationship is established,
- A daily review of account transactions,
- A review of personal custodial information on a quarterly basis to assess account activity, and
- A review of client correspondence on an as needed basis.

Mr. Lackey is supervised by Jennifer D. Lackey. She can be reached at (706) 352-4112.

Requirements for State-Registered Advisers

Gordon Thomas Lackey, Jr. has not been involved in an award or otherwise being found liable in an arbitration claim, an award or otherwise being found liable in a civil, self-regulatory organization or administrative proceeding, or been the subject of a bankruptcy petition.

Jennifer Driver Lackey

Individual CRD # 4509737

Relativity Capital Advisors, LLC

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Brochure Supplement

November 14, 2017

This brochure supplement provides information about Jennifer D. Lackey that supplements the Relativity Capital Advisors, LLC brochure. You should have received a copy of that brochure. Please contact Jennifer D. Lackey, CCO, if you did not receive Relativity Capital Advisors, LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about Jennifer D. Lackey is available on the SEC's website at www.adviserinfo.sec.gov.

Educational Background and Business Experience

Jennifer Driver Lackey



Year of birth: 1979

Formal education:

- University of Georgia, BBA Banking and Finance, 2001

Business background:

- Relativity Capital Advisors, LLC – Member/Partner (10/15 – Present)
- Barber Lackey Financial Group, LLC – CCO/Office Manager (08/01 – 12/16)
- Western International Securities, Inc. – Registered Principal (03/08 – 10/08)
- NRP Financial, Inc. – Registered Principal (04/07 – 04/08)
- Oberlin Financial Corp. – Registered Principal (01/06 – 04/07)

- FSC Securities Corporation – Registered Representative (01/02 – 01/06)

Disciplinary Information

Jennifer Driver Lackey has not been the subject of any disclosable legal or disciplinary event.

Other Business Activities

Mrs. Lackey is not engaged in any business activities other than those related to Relativity Capital Advisors, LLC.

Additional Compensation

Mrs. Lackey does not receive any additional compensation related to the advisory services provided to you.

Supervision

Jennifer Driver Lackey is a managing member of Relativity Capital Advisors, LLC. Mrs. Lackey is required to adhere to the processes and procedures as described in our firm's Code of Ethics. Her advice to you will be monitored by performing the following reviews:

- A review of relevant account opening documentation when the relationship is established,
- A daily review of account transactions,

- A review of personal custodial information on a quarterly basis to assess account activity, and
- A review of client correspondence on an as needed basis.

Mrs. Lackey is supervised by Gordon Thomas Lackey, Jr. He can be reached at (706) 352-4112.

Requirements for State-Registered Advisers

Jennifer Driver Lackey has not been involved in an award or otherwise being found liable in an arbitration claim, an award or otherwise being found liable in a civil, self-regulatory organization or administrative proceeding, or been the subject of a bankruptcy petition.