Item 1 - Cover Page

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This brochure provides information about the qualifications and business practices of Robert W. Colby Asset Management, Inc. (*Colby*). If you have any questions about the contents of this brochure, please contact us at 646-652-6879 or info@Colbyassetmanagement.com .

Additional information about Robert W. Colby Asset Management, Inc. is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 - Material changes from Firm Brochure dated 6/11/2024:

-Annual update.

Item 3: Table of Contents

Item 4 - Advisory Business

A. Robert W. Colby Asset Management, Inc. was registered in the state of New York in January, 2010. The principal owners of the firm are Robert W. Colby and William K. Anderson.
B. *Colby* manages portfolios for individuals and high net worth individuals based on technical, quantitative, and fundamental analysis. The firm utilizes proprietary investment research methods developed by Robert W. Colby, CMT, including, but not limited to, his Relative Strength Method and Systematic Trend Identification System. To date, we have invested primarily in Exchange Traded Funds (ETFs) and, to a lesser extent, individual stocks. We also may invest in closed-end funds, mutual funds, bonds, money markets, and cash equivalents when we deem these to be advantageous for our clients. We do not invest in futures or options contracts, except in the Colby CDT Program, as outlined in Item 8. *Colby* also offers weekly publications, including market analysis, market timing, and stock and/or ETF rankings.
C. Advisory services are limited to 6 actively managed portfolios and 4 allocations, and have not been tailored to the individual needs of clients. However, *Clients* may impose restrictions on investing in certain securities or types of securities.
D. We do not participate in wrap-fee programs.
E. We manage approximately $4.85 million on a discretionary basis as of December, 2024. To date, we have not managed money on a non-discretionary basis.

Item 5 - Fees and Compensation

A. Managed Accounts

Colby's management fees are either deducted from client accounts by independent third-party broker-dealer custodians or billed to the client on a quarterly basis in arrears. One fourth of the annual fee is deducted in January, April, July, and October in arrears, based on the client's ending balance for the quarter. Folio Institutional (Goldman Sachs) bases the fee deduction on the client's average daily balance for the quarter.

a. Annual Management Fees are as follows:

i. Accounts at Folio Institutional
0% of assets under management for the first $10,000,
1.0% for the next $490,000, and
0.75% for the amount over $500,000.00.

ii. Accounts at Charles Schwab
1.0% of assets under management

iii. Accounts at Interactive Brokers
1. Market Timer Accounts:
a. 0% on first $10,000, then
b. 0.5% on amount over $10,000
2. QUANT Leveraged IRA Accounts at Interactive Brokers:
a. 1.0% of assets under management $0 - $500,000.
b. 0.75% of assets under management $500,000 and above.

iv. Accounts at other custodians
2.0% of assets under management for the first $500,000, and

1.5% for the amount over $500,000.00.

B. *Colby* deducts fees from *Client* accounts at Folio Institutional, Charles Schwab, and Interactive Brokers if the *Client* approves fee-deduction by our firm. *Colby* bills *Clients* directly for fees if *Client* uses a custodian other than Folio Institutional or has not given permission for fee-deduction.

C. Fees charged by independent third-party broker-dealer custodians: Folio Institutional charges one flat fee (assessed quarterly) at the rate of 0.25% of account assets per year for unlimited trading during two "window" trading sessions each day, at 11:00 AM and 2:00 PM. If we deem it necessary or advantageous to trade at other times outside of one of these two "window" trading sessions, Folio Institutional charges an additional $3.95 per trade. There is a list of other fees (for wire transfers, paper statements, etc.) at Folio's web site: www.folioinstitutional.com.
Fees charged by exchange traded funds, closed-end funds, and mutual funds are deducted from the fund's net asset value and are reflected in the market price of each fund. There is no separate line item on clients' statements to show that fee deduction.
Charles Schwab charges per-trade commissions and other custodial fees as outlined on their website at www.Schwab.com.
Interactive Brokers charges per-trade commissions and other custodial fees as outlined on their website at www.InteractiveBrokers.com.

D. Our clients do not pay fees in advance.
E. Neither our firm nor any person at our firm accepts compensation from the purchase or sale of securities.

Item 6 – Performance-Based Fees and Side-by-side management.
We do not charge performance-based fees nor do we have "side-by-side management" conflicts of interest.

Item 7 - Types of Clients: we serve individuals and high net worth individuals. We have no minimum account requirements for opening or maintaining an account.

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

The following description of *Colby* and its trading methods and strategies is general and is not intended to be exhaustive. *Colby's* trading methods are proprietary and complex, so only the most general descriptions are possible. While *Colby* believes the description of its methods and strategies included herein may be of interest, prospective *Client*s must be aware of the inherent limitations of such description. *Colby* may change or refine elements of the trading systems employed whenever such change appears likely to benefit *Clients*.

Investing in securities involves Risk of Loss that *Clients* should be prepared to bear.

Objective:
Our objective is for our clients' accounts to outperform the S&P 500 over the long term while taking less risk. (The goal for clients subscribed to the New Era Bond Portfolio is to outperform the Barclays U.S. Aggregate Bond Index while taking less risk.) We use a variety of adaptive methods that Robert W. Colby developed and tested over his 46 years of investment research and trading. We monitor global financial markets daily and attempt to adapt to changing

conditions. When market conditions are favorable, when potential reward appears greater than potential risk according to our methods, we may invest in financial instruments that offer the greatest potential price strength according to our analysis. When conditions are unfavorable, when potential reward appears less than potential risk according to our methods, we may take defensive action to preserve and protect our clients' capital. Although we try to control risk, Client's may still lose money.

Research:
Numerous independent research studies show that Relative Strength has been one of the best strategies for stock selection for many decades. Generally, the Relative Strength calculation is based on some form of price momentum: for example, many studies divide the current price of a security by its price one year earlier to arrive at a rate of change. Next, that rate of change can be compared to the rates of change of all other securities in a predefined universe. With this precisely-defined quantitative data, researchers rank securities from strongest to weakest. *Colby* has worked with variations of this method for several decades and has made refinements that appear significant. *Colby's* updated version of the *Screening Method for Analysis of Relative Strength* uses a proprietary computer algorithm that is somewhat similar to the commonly-used price momentum (rate of change) but with different time periods and added filters to dampen random noise and weed out less liquid, inactive securities. *Colby* ranks hundreds of securities from highest to lowest momentum and buys the strongest ones at the top of the list, because research studies show that these are the securities most likely to perform well going forward.

Securities:
To date, *Colby* has invested primarily in Exchange Traded Funds (ETFs) because they offer low costs, tax efficiency, transparency, diversification, listed trading, liquidity, and stock-like features. *Colby* also has programs (Stocks Plus and CDT) that invest in individual stocks, applying the same relative strength ranking method. In the future, *Colby* may invest in bonds, money markets, and cash equivalents, if and when *Colby* deems these to be more advantageous for *Clients*. Except for *Colby's* CDT program, *Colby* does not trade or invest in futures or options contracts.

Long-Term Investment Time Horizon:
Colby's programs are not short-term trading programs. Major market trends generally take many months or years to develop and unfold. Therefore, *Colby* believes that an investment in any of the programs may experience the maximum benefit over a full market cycle, including both up trends and down trends. *Colby* recommends that *Clients* view their accounts as long-term investments with the objective of seeking capital appreciation over a period of several years.

Trading Tactics:
Colby may regularly rebalance *Clients*' accounts so that *Clients* hold roughly equivalent amounts of each of the top-ranked securities. In an effort to reduce risk, new *Clients'* accounts may be gradually phased in to a fully invested position over a period of several weeks or months, rather than all at once, in a single week, at *Colby's* discretion. In addition, there may be moderate and variable cash/income holdings for tactical purposes of trade timing.

Sometimes, when markets change rapidly, our investing methods demand frequent trading, which can increase commissions and other trading costs. Based on our actual experience to date, however, we do not expect trading costs to be substantial when using online discount brokers. The trading tools, constraints, and/or restrictions vary between custodians, so performance may differ when comparing accounts held at different custodians. Frequent trading can create short-term capital gains, which can be a consideration for taxable accounts. See your tax adviser; we do not offer tax advice. Taxes may be less of an issue for tax-free retirement accounts, such as 401(k) or IRA.

Risk of Loss:
Investing in securities involves Risk of Loss that *Clients* should be prepared to bear. Price movements of investments are influenced by many things, including but not limited to the following: changing supply and demand relationships; changing trade, financial, monetary, and exchange control programs; changing United States, state and local, and foreign political and economic events, policies, and regulations; changes in national and international interest rates and rates of inflation, currency devaluations and reevaluations; emotions of the market place; and acts of nature. None of these risks can be controlled, so no assurance can be given that any method, strategy, or advice will result in profitable trades or will not incur losses. Our trading programs concentrate in investments that offer the most favorable potential returns relative to risk, according to our research methods, as opposed to a broadly-diversified portfolio. Although our goal is "Absolute Returns", that is, positive returns in any market environment, we cannot guarantee that our trading strategies will be profitable. Furthermore, if in spite our best efforts our adaptive strategies prove to be ineffective, losses could turn out worse than average because investment portfolios are concentrated in relatively few financial instruments, rather than diversified across a wide array of financial products or strategies.

The goal of the Colby Safety-First Portfolio is to achieve capital appreciation while controlling risk, primarily by selecting various Exchange Traded Funds (ETFs) at advantageous times, according to *Colby's* comprehensive analysis, which may include *Colby's* updated version of the *Screening Method for Analysis of Relative Strength* (described above), other objective research methods, and considered judgment based *Colby's* estimates of Potential Reward compared to Potential Risk going forward.

The Colby Safety-First Portfolio is not designed to track the general stock market, and so it may not be highly correlated to the broad stock market indexes. Rather, it is designed with an objective to potentially perform relatively well in any market or economic environment, including periods of expansion, contraction, inflation, deflation, etc., unlike the broad stock market indexes, which passively track the general market, even when stock prices are in protracted downtrends. *Colby* attempts to obtain consistent quarterly returns that exceed those of the equity market and to protect capital against significant risks.

This program is maximally flexible: at times, achieving the objective may require concentration in volatile stocks; and at other times it may require *Colby's Bear Market Protection*, which is concentration in securities that appear to offer the greatest degree of safety and protection against anticipated market risks, such as defensive ETFs, U.S. Government Treasury Securities, and cash.

By concentrating investments in relatively few asset classes, we strive to outperform market indices, but this concentration could lead to short-term or long-term losses the *Client* would bear.

Colby intends to rebalance Clients' accounts on a timely basis whenever appropriate, daily if necessary, based on our multiple research methods. In bullish markets, characterized by rising price trends of securities, when Reward/Risk probabilities appear favorable, *Colby* may concentrate portfolio holdings in relatively strong securities, as determined by *Colby's* objective quantitative rankings and other tested methods. For example, bull market holdings may include the relatively strong ETFs, according to *Colby*'s quantitative sorting, as well as other investments instruments that appear to offer the potential to improve the balance and Reward/Risk potentials of the portfolio as a whole. For risk management, *Colby* will consider limiting exposure to any one stock sector, industry, or region. In order to protect and preserve Clients' capital, *Colby* intends to move portfolios entirely into lower-risk, defensive ETFs, fixed-income securities, money markets, cash and other defensive investments when Bear Market Protection appears prudent, according to *Colby's* continuous market analysis of the financial markets and quantitative rankings.

For all of the following trading strategies, we may concentrate investments in relatively few investments or asset classes. By concentrating investments in relatively few asset classes, we strive to outperform market indices, but this concentration could lead to short-term or long-term losses the Client would bear.

A. Additional information for the Colby Discretionary Trading Program (CDT) only.
CDT aims for relatively high absolute returns with limited risk. CDT employs a variety of active strategies for trading flexibility. CDT may engage in long-term and medium-term investing as well as short-term trading, including buying long, selling short, trading derivatives (options and futures), using margin, and day trading. In order to take full advantage of the CDT Program, we strongly recommend that the investor establish a margin account at one of our recommended independent broker/dealer custodians that meets our requirements for security and active trading capabilities.

B. Additional information for the Colby FLEX Portfolio (FLEX) only:
FLEX offers clients a flexible portfolio designed to adapt to changing conditions over time. The FLEX primary objective is to outperform the S&P 500 while taking less risk in both up and down markets. FLEX is based on our newest adaptive algorithm from Robert W. Colby's ongoing research. Because practical experience shows that fixed methods do not always perform in the future as they did in the past, *FLEX* will adapt to changing conditions over time, as needed.

FLEX is not a short-term trading system, but it will be updated continuously in order to respond to changes in the *major* trends in a timely manner. In bull markets, the *FLEX* portfolio will be fully invested, overweighting the ETFs representing asset classes that offer the greatest upside potential, according to the objective algorithm. Because prolonged major bear market trends offer a very different set of challenges, in order to protect capital from loss *FLEX* may convert (*shift*) up to 100% of the portfolio to cash, defensive ETFs, or bonds, automatically and incrementally, using *Colby's Systematic Trend Identification System*. As market conditions improve, assets will be shifted back into 100% ETFs, again, automatically and incrementally; that additional flexibility is intended allow us to outperform significantly in down markets. This "shifting" of assets is called "*Dynamic Allocation Shifting*." Inverse ETFs are included in our analysis.

C. Additional information for the Colby Stocks Plus Portfolio (Stocks Plus) only:
Stocks Plus offers *Clients* a stock portfolio designed to outperform the S&P 500 in *both* up and down markets. *Stocks Plus* is based on *Colby's* updated version of the *Screening Method for Analysis of Relative Strength* (described above). More than 600 stocks and strategic Exchange Traded Funds (ETFs) are analyzed weekly and investments are made in up to 20 of the best-performing investments. An attempt is made to diversify the holdings by industry and sector.

Stocks Plus is not a short-term trading system, but it will be updated continuously in order to respond to changes in the *major* trends in a timely manner. In bull markets, when the equity markets are in well-defined uptrends according to *Colby's* objective methods, the *Stocks Plus* portfolio is fully invested in up to 20 stocks. Because prolonged major bear market trends offer a very different set of challenges, in order to protect capital from loss *Stocks Plus* may convert (*shift*) up to 100% of the portfolio to cash, defensive ETFs, or bonds, automatically and incrementally, using *Colby's Systematic Trend Identification System*. As market conditions improve, assets will be shifted back into 100% stocks, again, automatically and incrementally; that additional flexibility is intended allow us to outperform significantly in down markets. This "shifting" of assets is called "*Dynamic Allocation Shifting*." Inverse ETFs are included in our analysis.

D. Additional information for the Colby New Era Bond Portfolio only:
(Formerly known as the Fixed-Income Portfolio—name change only.) The goal of the Colby New Era Bond Portfolio is to achieve capital appreciation while controlling risk, primarily by selecting various Exchange Traded Funds (ETFs) at advantageous times, according to *Colby's* comprehensive analysis, which may include *Colby's* objective research methods as well as *Colby's* considered judgment based estimates of Potential Reward compared to Potential Risk going forward.

The Colby New Era Bond Portfolio is not designed to track the general bond market, and so it may not be highly correlated to the broad bond market indexes. Rather, it is designed with an objective to potentially perform relatively well in any market or economic environment, including periods of expansion, contraction, inflation, deflation, etc., unlike the broad bond market indexes, which passively track the general market, even when bond prices are in protracted downtrends. *Colby* attempts to obtain consistent quarterly returns that exceed those of the bond market and to protect capital against significant risks. This program is maximally flexible: at times, achieving the objective may require concentration in volatile high-yield bonds; and at other times it may require *Colby's Bear Market Protection*, which is concentration in fixed-income instruments that appear to offer the greatest degree of safety and protection against anticipated market risks, such as U.S. Government Treasury Securities and cash.

E. Additional information for the Colby Algorithmic Trading System-Volatility/Opportunity (CATS-VO) only.

Investment Objective:
The Colby Algorithmic Trading System – Volatility (*CATS-VO*) seeks profits from speculative algorithmic trading systems.

Portfolio Turnover:
Clients pay transaction costs, such as commissions, when CATS-VO buys and sells securities (or "turns over" its portfolio). A higher portfolio turnover rate may indicate higher transaction costs and may result in higher taxes. Transaction costs are reflected in our performance data, but taxes are not.

Principal Investment Strategies:
The goal of CATS-VO is to achieve high absolute returns. CATS-VO is not designed to track the general stock market, and CATS-VO is not correlated to the broad stock

market indexes. Risk may be substantially higher than the S&P 500. CATS-VO was designed to capitalize on stock-market volatility trends, which can be highly variable at times, resulting in large variations in account equity. There can be no assurance that future market behavior will resemble historical market behavior on which the CATS-VO algorithm was developed. CATS-VO was designed to be maximally flexible, require buying long and selling short in a margin account. CATS-VO and margin accounts are not available for retirement accounts.

Portfolio:
Long-term holdings: CATS-VO will usually hold a longer-term *long or short* position in Exchange Traded Funds (ETFs) that track the performance of the S&P 500. CATS-VO is currently trading a non-leveraged ETF, ticker symbol 'SPY' - SPDR® S&P 500® ETF (https://www.ssga.com/us/en/institutional/etfs/funds/spdr-sp-500-etf-trust-spy).

Medium-term holdings: CATS-VO will usually hold a medium-term *long or short* position in *Leveraged* Exchange Traded Funds (ETFs) that track the performance of the S&P 500 in a bullish state, or will sell these ETFs short in a bearish state. CATS-VO is currently trading ticker symbol 'UPRO' - ProShares UltraPro S&P500 (https://www.proshares.com/funds/upro.html .) The S&P 500 has a tendency to trend upward over the long-term, so our algorithm buys long more often than it sells short in order to profit from this tendency.

Shorter-term holdings: CATS-VO will also trade *Leveraged* ETFs that track VIX Futures, long or short, based on Colby's proprietary algorithm. CATS-VO is currently trading ticker symbol 'UVXY' - ProShares Ultra VIX Short-Term Futures ETF (https://www.proshares.com/funds/uvxy.html.) During each trade, profits may be taken at pre-determined levels to lock in gains and to attempt to lower volatility. VIX Futures have a tendency to trend downward over time, so our algorithm sells short more often than it buys long in order to profit from this tendency.

Timing: Colby reserves the right to begin investing clients' funds gradually, or immediately, depending on the current state of the markets and the CATS-VO algorithm.

Principal Investment Risks:
The principal risks of investing in CATS-VO are summarized below. As with any investment, there is a risk that you could lose all or a portion of your investment in the program. Some or all of these risks may adversely affect the program's total return and/or ability to meet its objective.

The principal risks are presented in alphabetical order to facilitate finding particular risks and comparing them with those of other programs. Each risk summarized below is considered a "principal risk" of investing in the program, regardless of the order in which they appear.

• Associated Risks of Short-Term Signals. Because CATS-VO expects to change its exposure frequently based on short-term performance information, (i) CATS-VO's exposure may be affected by significant market movements at or near the end of such short-term period that are not predictive of such asset's performance for subsequent periods and (ii) changes to CATS-VO's exposure may lag a significant change in an asset's direction (up or down). Such lags between an asset's performance and changes to CATS-VO's exposure may result in significant underperformance (loss).

• Cybersecurity Risk. With the increased use of technologies such as the Internet to conduct business, CATS-VO is susceptible to operational, information security, and related risks. Cyber incidents affecting CATS-VO or its service providers may cause disruptions and impact business operations, potentially resulting in financial losses, impediments to trading, the inability of shareholders to transact business, violations of applicable privacy and other laws, regulatory fines, penalties, reputational damage, reimbursement or other compensation costs, or additional compliance costs.

• General Market Risk. Economies and financial markets throughout the world are becoming increasingly interconnected, which increases the likelihood that events or conditions in one country or region will adversely impact markets or issuers in other countries or regions. Securities in CATS-VO's portfolio may underperform in comparison to securities in the general financial markets, a particular financial market, or other asset classes, due to a number of factors, including inflation (or expectations for inflation), interest rates, global demand for particular products or resources, natural disasters or events, pandemic diseases, terrorism, regulatory events, and government controls.

• High Portfolio Turnover Risk. CATS-VO may actively and frequently trade all or a significant portion of the securities in its portfolio. A high portfolio turnover rate increases transaction costs for clients. Frequent trading may also cause adverse tax consequences for investors in CATS-VO due to an increase in short-term capital gains, losses, or wash sales.

• Management Risk. CATS-VO is actively-managed and may not meet its investment objective based on the Adviser's success or failure to implement investment strategies for CATS-VO.

• New Trading Program Risk. CATS-VO has been actively traded since August 31, 2020, and has a short operating history. As a result, prospective investors do not have a significant track record or history on which to base their investment decisions.

• Non-Diversification Risk. Because CATS-VO is "non-diversified," it may invest a greater percentage of its assets in the securities of a single issuer or a smaller number of issuers than if it was a diversified trading program. As a result, a decline in the value of an investment in a single issuer or a smaller number of issuers could cause CATS-VO's overall value to decline to a greater degree than if CATS-VO held a more diversified portfolio.

• Recent Market Events Risk. U.S. and international markets have experienced significant periods of volatility in recent years and months due to a number of economic, political and global macro factors including the impact of the novel coronavirus (COVID-19) as a global pandemic, which has resulted in public health issues, growth concerns in the U.S. and overseas, layoffs, rising unemployment claims, changed travel and social behaviors, and reduced consumer spending. The lasting effects of COVID-19 on the global economy and the recovery from COVID-19 are uncertain and may last for an extended period of time. These developments as well as other events could result in further market volatility and negatively affect financial asset prices, the liquidity of certain securities and the normal operations of securities exchanges and other markets.

• Underlying ETFs Risks. CATS-VO will incur higher and duplicative expenses because it invests in underlying ETFs. There is also the risk that CATS-VO may suffer losses due to the investment practices of the underlying ETFs. CATS-VO will be subject to substantially the same risks as those associated with the direct ownership of securities held by the underlying ETFs. Additionally, the market price of the shares of an underlying ETF in which CATS-VO invests will fluctuate based on changes in the net asset value as well as changes in the supply and demand of its shares in the secondary market. It is also possible that an active secondary market for an underlying ETF's shares may not develop, and market trading in the shares of the underlying ETF may be halted under certain circumstances.

Management:
Investment Adviser:
Robert W. Colby, CMT, serves as investment adviser to CATS-VO.
Portfolio Manager:
William K. Anderson is responsible for the day-to-day management of CATS-VO and has
been the portfolio manager of CATS-VO since its inception in August, 2020.

Account Requirements:
Margin account at Interactive Brokers (No IRA Accounts).
Account must have extended hours trading.
Account must be accessible to Robert W. Colby Asset Management, Inc. for trading only.

Minimum and Maximum Investment:
Minimum investment: $50,000.00
Maximum investment is not to exceed 10% of a client's total investable assets.

Tax Information:
CATS-VO distributions are generally taxable as ordinary income or capital gains (or a combination).

F. Additional information for the **Colby Market Timers** only:

Investment Objective:
The Colby Market Timers (*CMT*) seek to provide returns comparable to the Dow Jones Risk Indices in bull markets, and returns that exceed the Dow Jones Risk Indices in bear markets, targeting long-term outperformance of each risk index. The goal is to produce these returns with *less risk* and smaller draw downs. There are five versions of the Market Timer based on the client's risk tolerance: Aggressive, Moderately Aggressive, Moderate, Moderately Conservative, and Conservative.

Portfolio Turnover:
Clients pay transaction costs, such as commissions, when *CMT* buys and sells securities (or "turns over" its portfolio). A higher portfolio turnover rate may indicate higher transaction costs and may result in higher taxes (in brokerage accounts only, *not* IRA accounts). Taxes are not reflected in our performance data.

Principal Investment Strategies:
CMT was designed to track the performance of the S&P 500® during bull markets, and to move to cash or short duration bonds in bear markets. There can be no assurance that future market behavior will resemble historical market behavior on which the *CMT* algorithm was developed.

Portfolio:
Long-term holdings: *CMT* will usually hold a longer-term *long* position in Exchange Traded Funds (ETFs) that track the performance of the S&P 500®. *CMT* is currently trading a non-leveraged ETF, ticker symbol 'SPY' - SPDR® S&P 500® ETF (https://www.ssga.com/us/en/institutional/etfs/funds/spdr-sp-500-etf-trust-spy).

Depending on the client's risk tolerance, *CMT* will also hold a longer-term *long* position in Exchange Traded Funds (ETFs) that track the performance of short-, medium-, or long-term Treasuries, depending on market conditions.

Timing: Colby reserves the right to begin investing clients' funds gradually, or immediately, depending on the current state of the markets and the *CMT* algorithm.

Principal Investment Risks:
The principal risks of investing in *CMT* are summarized below. As with any investment, there is a risk that you could lose all or a portion of your investment in the program. Some or all of these risks may adversely affect the program's total return and/or ability to meet its objective.

The principal risks are presented in alphabetical order to facilitate finding particular risks and comparing them with those of other programs. Each risk summarized below is considered a "principal risk" of investing in the program, regardless of the order in which they appear.

• **Associated Risks of Long-Term Signals**. Because *CMT* expects to change its exposure occasionally based on long-term performance information, (i) *CMT*'s exposure may be affected by significant market movements at or near the end of such long-term period that are not predictive of such asset's performance for subsequent periods and (ii) changes to *CMT*'s exposure may lag a significant change in an asset's direction (up or down). Such lags between an asset's performance and changes to *CMT*'s exposure may result in underperformance (loss).

• **Cybersecurity Risk**. With the increased use of technologies such as the Internet to conduct business, *CMT* is susceptible to operational, information security, and related risks. Cyber incidents affecting *CMT* or its service providers may cause disruptions and impact business operations, potentially resulting in financial losses, impediments to trading, the inability of shareholders to transact business, violations of applicable privacy and other laws, regulatory fines, penalties, reputational damage, reimbursement or other compensation costs, or additional compliance costs.

• General Market Risk. Economies and financial markets throughout the world are becoming increasingly interconnected, which increases the likelihood that events or conditions in one country or region will adversely impact markets or issuers in other countries or regions. Securities in *CMT*'s portfolio may underperform in comparison to securities in the general financial markets, a particular financial market, or other asset classes, due to a number of factors, including inflation (or expectations for inflation), interest rates, global demand for particular products or resources, natural disasters or events, pandemic diseases, terrorism, regulatory events, and government controls.

• Management Risk. *CMT* is actively-managed and may not meet its investment objective based on the Adviser's success or failure to implement investment strategies for *CMT*.

• New Trading Program Risk. *CMT* has been actively traded since June 1, 2023, and has a short operating history. As a result, prospective investors do not have a significant track record or history on which to base their investment decisions.

• Recent Market Events Risk. U.S. and international markets have experienced significant periods of volatility in recent years and months due to a number of economic, political and global macro factors including the impact of the novel coronavirus (COVID-19) as a global pandemic, which has resulted in public health issues, growth concerns in the U.S. and overseas, layoffs, rising unemployment claims, changed travel and social behaviors, and reduced consumer spending. The lasting effects of COVID-19 on the global economy and the recovery from COVID-19 are uncertain and may last for an extended period of time. These developments as well as other events could result in further market volatility and negatively affect financial asset prices, the liquidity of certain securities and the normal operations of securities exchanges and other markets.

• Underlying ETFs Risks. *CMT* will incur slightly higher and duplicative expenses because it invests in underlying ETFs. *CMT* will be subject to substantially the same risks as those associated with the direct ownership of securities held by the underlying ETFs. Additionally, the market price of the shares of an underlying ETF in which *CMT* invests will fluctuate based on changes in the net asset value as well as changes in the supply and demand of its shares in the secondary market.

Fees and Expenses of *CMT*:
Robert W. Colby Asset Management, Inc. (*Colby*) charges no fee on the first $10,000 in *CMT* accounts, then a fixed investment management fee based on the value of assets in the account per the table below. Fees are deducted quarterly in arrears. Trading commissions and other fees are as specified on the Interactive Brokers website, www.interactivebrokers.com.

Accounts at Interactive Brokers:
0% of assets under management for the first $10,000,
0.5% for the amount in the account over $10,000.

Management:
***Investment Adviser*:**
Robert W. Colby, *CMT*, serves as the investment adviser to *CMT*.

Portfolio Manager:
William K. Anderson is responsible for the day-to-day management of *CMT* and has been the portfolio manager of *CMT* since its inception in June, 2023.

Account Requirements:
Traditional or Roth IRA account at Interactive Brokers.
Or a Brokerage account at Interactive Brokers.
Account must be *linked* to Robert W. Colby Asset Management, Inc. for *trading only*.
Account must have “Trade Fractional Shares” enabled.

Minimum and Maximum Investment:
Minimum investment: $100.00
Maximum investment: No maximum.

Tax Information:
CMT distributions are not generally taxable in IRA accounts, but are taxed in brokerage accounts as ordinary income or capital gains (or a combination).

G. Additional information for the **Colby QUANT Leveraged Portfolio**
Investment Objective:
The Colby QUANT Leveraged Portfolio (*QUANT Leveraged*) seeks profits from trading leveraged ETFs based on a short-term quantitative model.

Principal Investment Strategies:
QUANT Leveraged is based on Robert W. Colby's proprietary research and over 50 years of trading and system development. *QUANT Leveraged* looks for trading opportunities in the short-term based on intra-day and daily price movements. *QUANT Leveraged* can trade with the trend, against the trend, or it can stay in cash.

Portfolio:

QUANT Leveraged will trade a short- to medium-term *long or short* position in *Leveraged* Exchange Traded Funds (ETFs) that track the performance of 3 times the S&P 500, or it will hold cash or cash equivalents. *QUANT Leveraged* is currently trading ProShares UltraPro S&P500 (ticker symbol: UPRO). (https://www.proshares.com/funds/upro.html) We may trade other leveraged ETFs and inverse ETFs (instead of selling short), if other leveraged ETFs offer trading advantages. The *QUANT Leveraged* algorithm is very selective, and the portfolio is historically in cash over 50% of the time, waiting for high probability opportunities.

Portfolio Turnover Is High:
The Colby QUANT Leveraged Portfolio tracks short-term trading data and at times of high price volatility can make frequent trades, often daily. Clients pay transaction costs, including commissions, slippage and SEC fees. A high portfolio turnover may result in short-term capital gains, which are taxed at ordinary income tax rates. Transaction costs are reflected in our performance data, but taxes are not. We recommend clients implement *QUANT Leveraged* in a Roth or Traditional IRA account to avoid capital gains or wash sales due to high turnover.

Timing: Colby reserves the right to begin investing clients' funds gradually, or immediately, depending on the current state of the markets.

Principal Investment Risks:
The principal risks of investing in *QUANT Leveraged* are summarized below. As with any investment, there is a risk that you could lose all or a portion of your investment in the program. Some or all of these risks may adversely affect the program's total return and/or ability to meet its objective. Although Colby will work to prudently manage risks, there can be no guarantee that Colby will be able to manage risks that may be beyond Colby's ability to predict and control.

The principal risks are presented in alphabetical order to facilitate finding particular risks and comparing them with those of other programs. Each risk summarized below is considered a "principal risk" of investing in the program, regardless of the order in which they appear.

• **Associated Risks of Short-Term Signals**. Because *QUANT Leveraged* changes its exposure based on short-term market data, (i) *QUANT Leveraged*'s exposure is not predictive of the future performance of an asset and (ii) changes to *QUANT Leveraged*'s exposure may lead or lag a change in an asset's price direction (up or down). Variable leads and lags between an asset's performance and changes to *QUANT Leveraged*'s exposure may result in significant underperformance (loss).

• **Cybersecurity Risk**. With the increased use of technologies such as the Internet to conduct business, *QUANT Leveraged* is susceptible to operational, information security, and related risks. Cyber incidents affecting *QUANT Leveraged* or its service providers may cause disruptions to normal business operations, potentially resulting in impediments to trading, inability to transact business, and financial losses.

• **General Market Risk.** Economies and financial markets throughout the world are becoming increasingly interconnected, which increases the probability that events or conditions in one country or region may adversely impact markets or issuers in other countries or regions. Securities in *QUANT Leveraged*'s portfolio may underperform in comparison to securities in the general financial markets, a particular financial market, or other asset classes, due to a number of factors, including inflation (or expectations for inflation), interest rates, global demand for particular products or resources, natural and man-made disasters or events, pandemic diseases, terrorism, regulatory events, and government controls.

• **High Portfolio Turnover Risk.** *QUANT Leveraged* may actively and frequently trade all of the securities in its portfolio. A high portfolio turnover rate increases transaction costs for clients. Frequent trading may also cause adverse tax consequences for investors in *QUANT Leveraged* due to an increase in short-term capital gains, losses, or wash sales—for this reason, we recommend clients implement *QUANT Leveraged* in a Roth or Traditional IRA account.

• **Management Risk.** *QUANT Leveraged* is actively-managed and may not meet its investment objective due to unforeseen changes in market behavior that are not captured by the Adviser's quantitative model or due to the Adviser's inability to implement investment strategies.

• **New Trading Program Risk.** *QUANT Leveraged* has been actively traded since January, 2024, and has a short operating history. As a result, prospective investors do not have a significant track record or history on which to base their investment decisions. Furthermore, actual past trading results are not necessarily indicative of future results. No representation is being made that any account will or is likely to achieve profit or losses similar to actual trading results. All trading and investing involve risk of significant loss.

• **Non-Diversification Risk.** Because *QUANT Leveraged* is "non-diversified," it may invest a greater percentage of its assets in the securities of a single issuer or a smaller number of issuers than if it was a diversified trading program. As a result, a decline in the value of an investment in a single issuer or a smaller number of issuers could cause *QUANT Leveraged*'s overall value to decline to a greater degree than if *QUANT Leveraged* held a more diversified portfolio.

• **Market Events Risk.** U.S. and international markets may experience unpredictable and unusual volatility due to unforeseen economic, political, and global macro risks. For example, coronavirus (COVID-19) caused an unforeseen global pandemic, which resulted in a public health crisis, depressed economic performance, layoffs, unemployment, changed travel and social behaviors, and reduced consumer spending. The effects unpredictable disruptions to the global economy can be uncertain and could last for an extended period of time, negatively impacting the normal operations of financial markets.

Performance: Performance for *QUANT Leveraged* will be updated monthly on our website. All of our published performance data for *QUANT Leveraged* include all accounts that are fully funded in the program, and are net of all management fees, trading commissions, and any other fees assessed by Interactive Brokers.

Fees and Expenses of *QUANT Leveraged*:
Robert W. Colby Asset Management, Inc. (*Colby*) charges *QUANT Leveraged* accounts a fixed investment management fee based on the value of assets in the account: 1.0% per year (assessed quarterly at 0.25% per quarter) for margin accounts held at our recommended custodian, Interactive Brokers. Trading costs and fees are specified on the Interactive Brokers website. All fees are included in our performance numbers.

Management:
Investment Adviser:
Robert W. Colby, CMT, serves as investment adviser to *QUANT Leveraged*.

Portfolio Manager:
William K. Anderson is responsible for the day-to-day management of *QUANT Leveraged* and has been the portfolio manager of *QUANT Leveraged* since its inception in January, 2024.

Account Requirements:
Traditional or Roth IRA Account with Margin at Interactive Brokers.
Account must have extended hours trading.
Account must be accessible to Robert W. Colby Asset Management, Inc. for trading only.

Minimum Investment:
Minimum investment: $ 10,000.

Tax Information:
QUANT Leveraged gains/losses are generally short-term, and would be taxed as ordinary income, but this is not an issue for IRA accounts.

H. Dynamic Allocation Shifts
Colby has the ability to shift *Client* assets from one trading strategy to another, given certain market conditions, in an effort to preserve capital or to realize additional gains. For example, in bullish market conditions, a *Client* may be invested in the Stocks *Plus* portfolio, but if the bull market weakens and ultimately turns bearish, *Colby* can shift client assets out of 100% stocks and into cash, defensive ETFs, or bonds, automatically and incrementally, using *Colby's* discretion and/or *Colby's Systematic Trend Identification System*. As market conditions improve, assets will be shifted back into stocks, again, automatically and incrementally.

I. Allocations Based on Risk Profile

Colby developed a risk assessment profile for clients to use to determine the most appropriate mix of *Colby's* portfolios to meet their risk tolerance. After completing the risk assessment profile, clients can determine if their risk profile is *Aggressive, Moderately Aggressive, Moderately Conservative, or Conservative*. *Colby* will periodically adjust these allocations and rebalance *Client* accounts based on market conditions and *Colby's* discretion. These target allocations, along with the corresponding core portfolios are as follows:

Portfolio	**Aggressive**	**Moderately Aggressive**	**Moderately Conservative**	**Conservative**
	(target weights)	(target weights)	(target weights)	(target weights)
Stocks Plus	50%	35%	15%	0%
Safety First	40%	30%	20%	10%
FLEX	10%	20%	30%	10%
New Era Bond	0%	15%	35%	80%
Total	100%	100%	100%	100%

Item 9 - No Legal or Disciplinary Actions: there are no legal or disciplinary actions now, nor have there ever been any, against our firm or against any individuals in our firm.

Item 10 - No Other Material Financial Industry Activities and Affiliations

Neither the firm nor any management person or individuals in our firm

A. is registered, or has an application pending to register, as a broker-dealer or a registered representative of a broker-dealer;
B. is registered, or has an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities;
C. has any relationship or arrangement that could be material to our advisory business or to our clients that possibly could create any material conflict of interest with clients; or
D. recommends or selects other investment advisers for our clients or receives compensation directly or indirectly from any advisers.

Item 11 – Code of Ethics, No Participation or Interest in Client Transactions, Personal Trading

A. Code of Ethics of Robert W. Colby Asset Management, Inc.:

Objectivity: *Colby* strives to be completely fair and unbiased in providing advice to clients.

Confidentiality: *Colby* keeps all client data private unless authorization is received from the client to share it. *Colby* treats all documents with care and takes care when disposing of them. Relations with clients are kept private.

Competence: *Colby* does not provide advice in areas where it is not capable.

Fairness & Suitability: Dealings with clients always must be in clients' best interests. In all actions, *Colby* puts its clients first. In addition, *Colby* continuously seeks improved ways of serving clients' best interests.

Integrity & Honesty: *Colby* always takes the high road. *Colby* strives to be diligent to keep all actions and reactions so far above board that no client or other professional could doubt our intentions. Ever mindful of the potential for misunderstanding that can accrue in normal human interactions, *Colby* stands ready at all times to directly address any and all client concerns.

Regulatory Compliance: *Colby* conforms with all legal regulations.

Full Disclosure: *Colby* fully discloses to clients methods of compensation, the total cost of investments, and any potential conflicts of interest.

Professionalism: *Colby* exhibits the highest integrity and treats clients honestly and respectfully at all times.

A copy of this code of ethics will be made available to any client or prospective client.

B. We have no material interest in any investments we recommend.

C. We have no participation or interest in client transactions.

D. Personal Trading. We (the firm, management team, and/or employees) may trade or invest in the same securities as clients. To avoid any conflicts of interest, if we invest in the same securities as our clients, we will always execute orders for clients *first* or *at the same time* (same block trade and same prices) as our own.

Item 12 - Brokerage Practices: describe the factors that you consider in selecting or recommending broker-dealers for client transactions and determining the reasonableness of their compensation (e.g., commissions).

Since our management style may involve frequent trading at times, we recommend that Clients use discount brokers that charge low fees. See Section 5. We check brokers' trade reports to verify that our clients are receiving fair executions when buying and selling, and we challenged any execution that appears unfavorable to our clients' best interests. We direct clients to use Folio Institutional, as described in Section 5.

Our recommended broker-dealer custodians allow us to aggregate orders to ensure all clients at each broker-dealer custodian receive the same prices for securities when buying or selling.

Market prices of securities fluctuate continuously, moment to moment, so order execution prices may vary among different broker-dealer custodians depending on minute differences in order placement. We make every effort to ensure fair order executions for all clients.

1. We do not receive research from anyone and do not pay “soft dollars” to anyone.
2. We do not receive referrals from broker-dealers.
3. We do not have any economic relationship or financial interest in any broker-dealers or custodians.

4. We have no conflicts of interest with our broker-dealers.

Item 13 - Review of Accounts

A. Quarterly performance reports are sent to clients by email.
B. Individual monthly statements for each of our clients are provided by our broker-dealer custodians. In addition, clients can review their complete account activity anytime online.
C. Although we generally do not provide individualized reports to clients, we will review any client account on request. Reviews are conducted by William K. Anderson or Robert W. Colby.
D. Annual review with clients to ensure investment objectives and suitability of investments are still accurate.
E. Annual review with clients to assess the need for a trusted contact to be added to accounts to protect senior/vulnerable adults.

Item 14 - Client Referrals and Other Compensation

A. No person who is not a *client* provides an economic benefit to our firm for providing investment advice or other advisory services to our *clients.*
B. *Colby* does not compensate any individuals (*Solicitors*) for client referrals.

Item 15 - Custody. We do not hold custody of client funds, securities, or cash. Custody is held by independent third-party, broker-dealer custodians.

Item 16 - Investment Discretion. We accept discretionary authority to manage securities accounts on behalf of clients; we manage investment portfolios based on our documented trading program as outlined in our investment management agreement and Firm Brochure. Clients may place limitations on our authority by requesting certain holdings or investments be excluded from our discretion, which is acceptable. Clients sign a *limited power of attorney for trading only* before we will accept discretionary authority.

Item 17. - Voting Client Securities.

A. We do not vote proxies on behalf of clients.
B. We do not have authority to vote client proxies. Clients will receive proxies or other solicitations directly from their custodian. We will not give clients advice as to how to vote proxies or how to respond to solicitations.

Item 18 - Financial Information

A. We do not require clients to prepay fees.
B. We have no financial condition that would impair our ability to meet contractual commitments to clients.
C. We have never been subject to any bankruptcy petition.

Item 19 – State Registered Advisors

A. Details about principal executives, including their formal educations and business backgrounds, are as follows:

Robert W. Colby

Robert W. Colby is responsible for determining the investments made in *Clients'* individual, separate accounts. Mr. Colby is the Chairman and Chief Investment Strategist of Robert W.

Colby Asset Management, Inc., a Registered Investment Advisor in New York State, and all other states where required.

Mr. Colby's 50-year career in the financial industry includes experience in portfolio management, investment research, trading, consulting, teaching, and developing methods and systems for trading and investing. He developed objective and quantitative Algorithmic Market Timing Models, Relative Strength Ranking Systems, Daily Stock Screens highlighting Major Breakouts/Breakdowns, and other useful tools for managing large universes of stocks. He also has created models for fixed-income and other investment instruments.

Mr. Colby founded Robert W. Colby Asset Management, Inc., in 2010. From 2001 to 2010, Mr. Colby worked as a researcher and consultant, primarily serving institutional investors. From 2000 to 2001, Mr. Colby was an instructor at the New York Institute of Finance, where he developed and taught a new course, *Technical Analysis for Traders*. In 2001, he also was an adjunct professor at New York University, where he developed and taught a new course, *Market Timing for Investors*. From 1990 to 2001, Mr. Colby was a proprietary trader at Schonfeld Securities and Cowen & Company, both in New York. In 1989-1990, Mr. Colby was a Research Consultant at Ned Davis Research, where he contributed to the firm's proprietary model building methods. From 1980 to 1989, Mr. Colby was a Senior Technical Research Analyst and Vice President at Smith Barney in New York. From 1969 to 1979, Mr. Colby held several positions as a Technical and/or Fundamental Analyst for *Indicator Digest* and *Income Investor* investment newsletters in New Jersey, Value Line Investment Survey in New York, Loewi & Company in Milwaukee, A.G. Edwards in St. Louis, and The Ohio Company in Columbus.

Mr. Colby earned a BS in Business Administration from the Ohio State University in 1969, with honors: cum laude, Beta Gamma Sigma, and Pace Setters. He majored in Real Estate and Finance. He completed all undergraduate and graduate-level course work in investments and finance, with a focus on stock-market related courses.

Professional Accreditation: CMT (Chartered Market Technician)

Securities Exams Passed: General Securities Principal Series 000, Registered Representative Series 1, National Commodity Futures Series 3, Interest Rate Options Series 5, General Securities Representative Series 7, and Uniform Investment Adviser Law Series 65.

Publications: Colby, Robert W., *The Encyclopedia of Technical Market Indicators,* Second Edition, McGraw-Hill, 2003, 820-pages, as well as the First Edition in 1988. This encyclopedia is the critically-acclaimed, standard research reference for trading systems design. Mr. Colby also published investment articles in *Forbes, Institutional Investor, Technical Analysis of STOCKS & COMMODITIES, SFO* (STOCKS, FUTURES AND OPTIONS MAGAZINE), *Active Trader, The Technical Analyst, MarketWatch, TradingMarkets.com, TraderPlanet.com, Physician's Money Digest, PC Magazine* (technical analysis software reviews), and *Futures Magazine.* He has written about investment strategies, research methodologies, fundamental indicators, and chart pattern interpretation.

Mr. Colby is a Member of the Market Technicians Association since 1980. He currently serves as a Subject Matter Expert, question writer, and grader of a series of three examinations leading to the Chartered Market Technician accreditation. He has served on the MTA Prometric CMT Exams Standard Setting Panel, the Accreditations Committee, and as chairman of the MTA Programs Committee.

Mr. Colby has been a featured speaker at the Traders' Expo, Money Show, ETF Summit, Market Technicians Association, New York Institute of Finance, New York University, Rutgers University Graduate School of Business, Omega Research Trading Strategy Conference, and the Technical Analysis Group Annual Conference.

Mr. Colby has no disciplinary actions against him.

William K. Anderson
William K. Anderson is the CEO and COO of Robert W. Colby Asset Management, Inc. Mr. Anderson is responsible for the daily operations of the firm including, but not limited to: executing trades, compliance, client relations, and customer service.

From 2000 to 2009, Mr. Anderson was the CEO of RealReturns.com, an on-line financial advisory service. At RealReturns, Mr. Anderson developed an unbiased financial advisory system that offered portfolio optimization recommendations for retirement plans. RealReturns also offered basic financial planning advice including legal documents, insurance, budgeting, saving, spending, and financial goal creation and monitoring.

Prior to his career change to the Financial Planning field, Mr. Anderson spent 17 years with Lucent Technologies and AT&T. He started as an Industrial Engineer in a high-tech manufacturing facility and advanced to Product Manager for AT&T's AUDIX Voice Messaging System. After managing several hardware and software releases, he moved into a sales role, supporting multi-media and contact center solutions sales to Fortune 500 companies in the Northeast.

Mr. Anderson gained formal training in investment fiduciary responsibility by completing the Accredited Investment Fiduciary (AIF) training by the Center for Fiduciary Studies, in association with the University of Pittsburgh Katz Graduate School of Business.

Mr. Anderson is a Registered Investment Advisor Representative, holds a Series 65 License, and is a Financial Planner.

Mr. Anderson's Education Includes:

- The Accredited Investment Fiduciary training,
- A Certification in Financial Planning from New York University,
- An M.B.A. from the University of North Carolina at Greensboro, and
- A B.S. Degree in Industrial Engineering from the University of Tennessee.

Mr. Anderson has no disciplinary actions against him.

B. We are not engaged in any other business other than investment management.
C. Our firm is not compensated using performance-based fees.
D. No person at our firm has been found liable in any arbitration claim or a civil, self-regulatory organization, or administrative proceeding.
E. We have no relationships with any issuer of securities.

Wrap Fee Program. We do not offer a wrap fee program.

Part 2 B, Brochure Supplements. Robert W. Colby Asset Management, Inc. does not provide brochure supplements because the firm does not employ other supervised persons, nor do we formulate personal investment advice for any client. We offer only *impersonal investment advice* as defined by the SEC.