

**ADV Part 2A
ADVISER BROCHURE**

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This Brochure provides information about the qualifications and business practices of CIO Capital Group, LLC ("CIO Capital" or the "Firm"). If you have any questions about the contents of this Brochure, please contact us at 212-609-2087 or our Chief Compliance Officer ("CCO"), Abraham Ouano, ao@ciocapitalgroup.com. 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.

CIO Capital is an investment adviser registered with the United States Securities and Exchange Commission ("SEC") under the U.S. Investment Advisers Act of 1940, as amended ("Advisers Act"). Registration with the SEC does not imply any level of skill or training.

Additional information about CIO Capital is also available on the SEC's website at <https://adviserinfo.sec.gov/>.

ITEM 2 – MATERIAL CHANGES

This Brochure was prepared in accordance with the SEC's requirements in seeking approval for federal registration as an investment adviser. This is the firm's initial brochure; therefore, there are no material changes to report.

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ITEM 4 – ADVISORY BUSINESS

Owners

CIO Capital Group, LLC ("CIO Capital", the "Firm", "we", "our", "us") was founded in 2025 as a limited liability company in the state of Delaware.

CIO Capital Group, LLC is wholly owned by CIO Group LLC, a limited liability company. The only individual who owns 25% or more of CIO Capital Group, LLC through CIO Group LLC is David Bailin, who serves as the Firm's Chief Executive Officer and Chief Investment Officer.

CIO Capital is an SEC registered investment adviser that provides personalized investment management and advisory services to ultra-high-net-worth individuals, families, and related entities. We advise on both discretionary and non-discretionary accounts and may provide recommendations on held-away assets depending on client needs and engagement structure.

Our investment process incorporates global macroeconomic awareness, scenario planning, and multi-asset risk modeling. This allows us to help clients preserve capital, manage downside exposure, and make more informed financial decisions. All investment decisions are made by CIO Capital's investment professionals based on a comprehensive review of client objectives and market conditions. Services are customized based on each client's goals, complexity, and engagement scope, and may include portfolio construction, cash management, and advisory support on alternative investments and risk mitigation.

Additional information is available to clients in CIO Capital's brochure supplements (e.g., ADV Form 2B), in accordance with SEC requirements.

Investment Management Services

CIO Capital provides investment management and advisory services to separately managed accounts of ultra-high net worth individuals ("UHNW"), and family offices (each referred to as the "Client", collectively the "Clients") on a discretionary and non-discretionary basis. Our Portfolio Managers have primary responsibility for formulating investment advice and exercising discretion for their Client's separately managed accounts. Portfolio Managers meet with Clients to discuss Client's financial goals and objectives, as well as establishing a risk tolerance. Such information is considered by our Portfolio Manager when initially structuring a Client's portfolio and for ongoing monitoring and managing portfolios. The Firm primarily invests client assets in stocks, exchange-traded securities, closed-end funds, mutual funds and various types of fixed income securities.

CIO Capital, if requested by its Clients, may provide non-discretionary asset management services. Under this relationship, CIO Capital consults with the Client prior to executing trades in the Client's account. In addition, CIO Capital may monitor and manage Client investments and provide consolidated portfolio reporting and portfolio management to the Client. All investment management services are governed by an investment management agreement ("IMA") between CIO Capital and the Client.

Assets under Management (Regulatory Assets under Management)

As of the date of this Firm Brochure, our Regulatory Assets Under Management ("RAUM") were \$0 of which \$0 are managed on a discretionary basis and \$0 are managed on a non-discretionary basis.

ITEM 5 – FEES AND COMPENSATION

Investment Management Fees

CIO Capital charges an investment advisory fee to its Clients. The annual advisory fee is paid quarterly in arrears and is calculated using the AUM as of the last business day of the quarter — which generally includes all discretionary and/or non-discretionary assets in an account that are invested or held for investment (including cash and cash equivalents) except for those assets that have been expressly excluded under the respective fee agreement or otherwise as determined by the Portfolio Manager. The advisory fee is assessed in accordance with the fee schedule the client authorized. CIO Capital has, and may in the future, at its discretion, waive or reduce the fees calculated in accordance with the fee schedule.

CIO Capital charges an annual asset-based advisory fee according to the following breakpoint schedule:

Assets Under Management	Annualized Fee
Up to \$10,000,000	0.75%
\$10,000,001 to \$25,000,000	0.65%
Over \$25,000,000	0.55%
Cash Management Only	0.25%

In certain circumstances, multiple accounts of Clients related by a household may be combined to reach a certain asset under management level in order to qualify for certain fee breakpoints. Several factors—such as the amount of assets invested, and types of investments being made - may influence the amount of the annual fee.

Unless a Client directs otherwise, fees are deducted from the relevant account or from a related account. When fees are deducted, the charge is shown on the monthly statement for the month in which the charge is made. Fees are prorated for accounts that open or close during the billing period.

Clients do not pay any charges to CIO Capital except as described above in connection with investment advisory services. CIO Capital does not charge commissions to Clients. CIO Capital's management fees may or may not be exclusive of any fees and/or expenses charged by third-parties. Such third-party fees and/or expenses may include, but not be limited to, custodial fees, brokerage commissions, transaction fees, third-party investment management fees, administrative fees, odd lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. With respect to investments in mutual funds including Exchange Traded Funds ("ETFs"), management/marketing fees are charged by such funds. These fees are included in the cost of the shares and are disclosed in the prospectuses that are sent by the custodian at the time of purchase. In all cases, a portion of those fees (often called 12b-1 fees) are directed to the custodian. Because CIO Capital is not a broker-dealer, we are not allowed to receive any portion of these fees. Clients should review their custodial statements to review all expenses.

Clients should note that similar advisory services may (or may not) be available from other registered (or unregistered) investment advisers for similar, lower, or higher fees.

ITEM 6 – PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

CIO Capital does not charge any performance-based fees.

ITEM 7 – TYPES OF CLIENTS

CIO Capital's Clients are primarily ultra-high-net-worth individuals, families, and related entities.

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

Investing in securities involves risk of loss that Clients should be prepared to bear.

CIO Capital manages portfolios for Clients based upon their personal objectives, goals and risk tolerances. Portfolio Managers consider Client's anticipated future spending requirements, age, and financial circumstances. The desire for income and safety of principal are balanced with the need for inflation protection and willingness or ability to assume risk in order to facilitate future growth. Depending on the investment objectives and risk tolerance of the Client, a portfolio may include stocks, bonds, U.S. Treasury bills, cash equivalents, preferred stocks, open-end funds and closed-end funds or ETFs representing a basket of equities or fixed income securities. In isolated cases and only with separate signed approval by the Client, a Portfolio Manager may also use alternative private fund investments or exchange listed options as part of an investment strategy.

CIO Capital attempts to mitigate the risks posed by individual securities by holding a selection of securities in different asset classes, such as stocks, bonds and cash equivalents. CIO Capital typically seeks to diversify holdings across industry classes within each portfolio or family group. Portfolio Managers use their discretion to determine the composition of each portfolio or family group.

Summary of Material Risks

There can be no assurance that the investment objective of our Clients will be achieved, and that Clients will not incur losses. The risks described below are not meant to be a comprehensive collection of all risks with which Clients will be confronted. Each Client is also encouraged to consult with CIO Capital to review the specific risk parameters of, and assets that comprise of, the Client's account at any given time and from time to time.

Equity Securities

Common stocks and other equity securities generally increase or decrease in value based on the earnings of a company and on general industry and market conditions. The value of a company's share price could decline as a result of poor decisions made by management, lower demand for the company's services or products or if the company's revenues fall short of expectations. There are also risks associated with the stock market overall; in particular, the stock market may experience periods of turbulence and instability.

Options

Options can be highly volatile investments and involve special risks. Successful investment strategies using options require the ability to predict future movements in securities prices, interest rates and other economic factors. CIO Capital's, or an investment manager's efforts to use options (even for hedging purposes) may not be successful. CIO Capital or an investment manager can invest in options based on any type of security, index or currency, including options traded on foreign exchanges and options not traded on exchanges. If the Firm or an investment manager applies a hedge at an inappropriate time or judges market conditions incorrectly, options strategies will reduce a Client's return. A Client will also experience losses if the prices of option positions were to be poorly correlated with its other investments, or if it could not close its positions because of an illiquid secondary market.

Fixed Income Securities

Fixed income or debt securities have varying levels of sensitivity to changes in interest rates. In general, the price of a debt security can fall when interest rates rise and can rise when interest rates fall. Securities with longer maturities and mortgage-backed securities can be more sensitive to interest rate changes. In addition, short-term securities tend to react to changes in short-term interest rates, and long-term securities tend to react to changes in long-term interest rates. Many types of fixed income securities are also subject to prepayment risk. Securities subject to prepayment can offer less potential for gains during a declining interest rate environment and similar or greater potential for loss in a rising interest rate environment. Below-investment grade fixed income securities are generally subject to greater credit risk than investment-grade securities and will be issued by companies whose financial condition is troubled or uncertain and that may be involved in bankruptcy proceedings, reorganizations, or financial restructurings. Many below-investment grade fixed income securities are also less liquid than investment-grade securities and could be subject to greater volatility.

Exchange Traded Funds

Exchange Traded Funds ("ETFs") are designed to represent a fixed portfolio of securities that is intended to track a particular market index. The risks associated with investing in ETFs generally reflect the risks of owning the underlying securities in which they are designed to track, although lack of liquidity in an ETF could result in an ETF being more volatile than the particular market index it intends to track. ETFs also have separate management fees and expenses, which a Client will bear through its investment in the underlying ETF.

Open-End Mutual Funds

Open-end mutual funds allow investors to purchase or sell shares daily. The share price is based on the fund's net asset value ("NAV"), which is calculated by dividing the total value of the assets minus liabilities by the number of outstanding shares. Generally, open-end mutual funds can only be bought or sold once per trading day, which can limit an investor's ability to trade at a desired time or price. The risks associated with open-end mutual funds include market fluctuations which may cause investors to lose money if they sell during a downturn or if the fund performs poorly. Open-end mutual funds also tend to charge expenses for active management that reduce their returns. Lastly, if open-end mutual funds experience mass withdrawals, it may force the manager to sell securities at reduced prices, leading to lower NAV and returns.

Economic Conditions

Changes in economic conditions, including, for example, interest rates, inflation rates, currency and exchange rates, industry conditions, competition, technological developments, trade relationships, political and diplomatic events and trends, tax laws and innumerable other factors, can affect substantially and adversely the investment performance of a Client's account. Economic, political and financial conditions (including military conflicts and financial sanctions), or industry or economic trends and developments, may, from time to time, and for varying periods of time, cause volatility, illiquidity or other potentially adverse effects in the financial markets. None of these conditions is or will be within the control of CIO Capital, and no assurances can be given that CIO Capital will anticipate these developments.

Business Continuity Risks

CIO Capital's business operations may be vulnerable to disruption in the case of catastrophic events such as fires, natural disasters, terrorist attacks or other circumstances resulting in property damage, network interruption and/or prolonged power outages. Although CIO Capital has implemented measures to manage risks relating to these types of events, there can be no assurances that all contingencies can be planned for. These risks of loss can be substantial and could have a material adverse effect on CIO Capital and investments therein.

Regulatory/Legislative Developments Risk

Regulators and/or legislators may promulgate rules or pass legislation that places restrictions on, adds procedural hurdles to, affects the liquidity of, and/or alters the risks associated with certain investment transactions or the

securities underlying such investment transactions. Such rules/legislation could adversely affect the value associated with such investment transactions or underlying securities.

Future legal, tax and regulatory changes could occur that may adversely affect business and require additional reporting for registered investment advisors. The SEC, other regulators and self-regulatory organizations and exchanges have taken various extraordinary actions in connection with market events and may take additional actions. Registered investment advisors may also be adversely affected by changes in the enforcement or interpretation of existing laws, rules and regulations, including tax laws, by federal, state and non-U.S. agencies, courts, authorities or regulators.

Risk of Loss

Investing in securities involves risk of loss that Clients should be prepared to bear. All investments in securities and other financial investments involve substantial risk of volatility arising from numerous factors that are beyond the control of CIO Capital and alternative investment managers or strategies utilized by CIO Capital, including market conditions, changing domestic or international economic or political conditions, changes in tax laws and government regulation and other factors.

For certain securities purchased for accounts, such as mutual funds and newly issued municipal bonds, Clients receive prospectuses and official statements which identify the risk factors associated with those securities and issuers. Clients are encouraged to review such disclosure documents.

THIS LIST OF RISK FACTORS DOES NOT PURPORT TO BE A COMPLETE ENUMERATION OR EXPLANATION OF THE RISKS INVOLVED IN CONNECTION WITH THE ADVISER'S INVESTMENT OR THE MANAGEMENT OF CLIENTS ACCOUNTS. IN ADDITION, PROSPECTIVE CLIENTS SHOULD BE AWARE THAT, AS THE MARKET DEVELOPS AND CHANGES OVER TIME, INVESTMENTS ON BEHALF OF CLIENTS MAY BE SUBJECT TO ADDITIONAL AND DIFFERENT RISKS.

ITEM 9 – DISCIPLINARY INFORMATION

CIO Capital and our management have no disciplinary events within the prior ten years to disclose.

ITEM 10 – OTHER FINANCIAL INDUSTRY ACTIVITIES OR AFFILIATIONS

CIO Capital is only registered as an investment adviser with the Securities and Exchange Commission. The Firm does not maintain industry affiliations or other financial industry relationships.

ITEM 11 – CODE OF ETHICS, PARTICIPATION IN CLIENT TRANSACTIONS AND PERSONAL TRADING

CIO Capital has implemented measures to ensure that it adheres to its responsibility to treat Clients with a high level of fiduciary attention.

Code of Ethics

CIO Capital has adopted a Code of Ethics ("Code") detailing the standards of conduct expected of its supervised persons. The Code and other written procedures of CIO Capital contain policies reasonably designed to prevent violations of the federal securities laws. The Code and procedures therein also require CIO Capital's personnel to

report certain of their personal securities holdings and transactions and obtain pre-approval for specific types of investments such as initial public offerings ("IPOs") and private placements. CIO Capital maintains a "restricted list" which identifies all securities in which CIO Capital, or any CIO Capital's supervised persons have material non-public information or other situations that may be presented to restrict a security for a period of time. CIO Capital supervised persons are prohibited from trading in securities on the restricted list. Supervised persons, including the Portfolio Managers, are permitted to invest in the same securities as Clients within a block trade and obtain the same price as Clients, consistent with CIO Capital's fiduciary duty to Clients. Portfolio Managers are prohibited from day-trading any securities which are held in Client accounts. Portfolio Managers also must obtain pre-clearance from the CCO or his/her designee for any individual (non-block) trades and document their reasoning if they trade for their own accounts in an opposite way from the way they trade for Clients' accounts (e.g., if a Portfolio Manager sells a particular stock in his own account while buying or holding it for Clients' accounts). CIO Capital will provide clients and prospective clients a copy of its Code, upon written request.

Potential Conflicts of Interests

Personal Trading and Participation or Interest in Client Transactions

The Portfolio Managers routinely buy and own for themselves the same securities that they recommend to Clients. CIO Capital believes this demonstrates the Portfolio Managers' faith in the securities they purchase for Clients. CIO Capital recognizes, however, that this overlap can create potential conflicts of interest, particularly because CIO Capital's business model encourages Portfolio Managers to use subjective allocations to satisfy individual Client needs. Although the Portfolio Managers believe they do not engage in personal trading to Clients' detriment and that all Clients are treated fairly and equitably over time, some disparities in allocation and price across accounts may result. CIO Capital has developed procedures to mitigate some of the effects of such conflicts. Portfolio Managers may not buy or sell a security that is being purchased, sold or considered for Client accounts they manage until they have reviewed all Client accounts the particular Portfolio Manager or Portfolio Managers manage and determined that the trades they are entering for themselves (or for their related accounts) have already been entered for the advisory Clients for whom they intend to trade at that time. Further, when Portfolio Managers trade in their own accounts on the same day as Client accounts over which they exercise primary management responsibility, they are not permitted to receive better executions than their advisory Client trades executed on the same day.

Notwithstanding these procedures, changes in market conditions, fluctuations in cash balances (due to, among other things, new deposits, accumulation of dividends and interest, sales of other securities, maturity dates of bonds) and other idiosyncratic factors may drive the Portfolio Managers' allocation decisions. Not all Clients of a Portfolio Manager who buys (or sells) a security will do so on the same day, and some may buy or sell after the Portfolio Manager has bought (or sold) for himself and for his family accounts. Depending on the availability of the security, subsequent price movements, the frequency with which the security trades, and other subjective factors considered by the Portfolio Manager, Clients may not all receive allocations at or about the same time as other clients, or as the Portfolio Managers themselves. As part of the ongoing oversight by Compliance, personal trading activities will be reviewed regularly.

Firm Trading

CIO Capital does not maintain principal or proprietary accounts, nor does the Firm engage in agency cross transactions.

ITEM 12 – BROKERAGE PRACTICES

CIO Capital is not registered as a broker-dealer, nor does the firm act as a broker-dealer. Most of the trades made by CIO Capital are directed through a qualified custodian.

CIO Capital generally recommends that its investment management clients utilize the custody and brokerage services of an unaffiliated broker/dealer custodian as its Custodian. Currently, this includes Goldman Sachs

("Goldman") and Fidelity Clearing & Custody Solutions and related entities of Fidelity Investments, Inc. (collectively "Fidelity"), each a FINRA-registered broker-dealer and member of SIPC and a "Qualified Custodian" as that term is described in Rule 206(4)-2 of the Investment Advisers Act of 1940 ("Advisers Act"). Each Custodian provides custody of securities, trade execution, and clearance and settlement of transactions placed by CIO Capital. If your accounts are custodied at Goldman or Fidelity, Goldman or Fidelity will hold your assets in a brokerage account and buy and sell securities when we instruct them to.

Best Execution

As an investment adviser, CIO Capital has a duty to use reasonable diligence to obtain "best execution" for the transactions being affected for Clients. Essentially this means that CIO Capital's trading process must seek to maximize value such that the total costs and proceeds are the most valuable to Clients under the circumstances. In selecting a broker, CIO Capital considers the full range of the broker's services, not just the cost, including, but not limited to:

- Quality of execution—i.e., the accuracy and timeliness of executions, clearance and error/dispute resolution;
- Reputation, financial strength, and stability of the broker;
- Desired timing of transactions and size of trades; and
- Overall cost of trades.

CIO Capital directs majority of its trades orders through an order routing system provided by the custodians, which is designed to automatically seek out the best bid or offer as well as the largest source of liquidity. The custodians charge service fees, which are fully disclosed to Clients in their IMAs.

Research and Soft Dollars

CIO Capital has no active soft dollar arrangements.

Aggregation of Client Orders

Absent special circumstances (such as client deposits occurring mid-day), all discretionary Client trades in advisory accounts executed on a single day, on the same side of the market, by the same Portfolio Manager, are averaged together. This practice is designed to treat all Clients fairly on average but means that any particular Client's trade may receive a better or worse price than it would have had the trade not been aggregated with other Clients.

Trade Errors

As a fiduciary, CIO Capital will have the responsibility to effect orders correctly, promptly and in the best interests of the Client. In the event any error occurs in the handling of any transactions due to CIO Capital's actions, or inaction, or the actions of others, CIO Capital's policy is to assess each trade error on a case-by-case basis and assure that the Client is made whole. CIO Capital will defer to the trade error policies of the custodians if applicable.

ITEM 13 – REVIEW OF ACCOUNTS

The Portfolio Managers review the advisory accounts they are responsible for at least quarterly, however in practice accounts are monitored on a continuous basis. When reviewing accounts, the Portfolio Managers look for percentage allocation in specific investments and/or industry class, among other factors, as they relate to Client's individual circumstances.

Clients are encouraged to notify their Portfolio Managers whenever they have changes to their financial circumstances, investment objectives and/or risk tolerances. Such communications trigger additional account reviews to assess the new information.

Portfolio Managers provide reports to Clients that report, among other things, the account's performance over the preceding calendar year, as well as all investment advisory fees deducted from that account during the prior year. This is in addition to the transaction confirmations and periodic account statements sent by the custodian. We urge Clients to carefully review these reports and compare the statements that they receive from their custodian to the reports that we provide. The information in our reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

ITEM 14 – CLIENT REFERRALS AND OTHER COMPENSATION

The Firm does not compensate any third-parties to assist with client referrals.

CIO Capital may refer clients to third-party investment advisers for portfolio management or specialized advisory services. In such cases, CIO Capital may receive a portion of the advisory fee paid to the third-party adviser. This referral arrangement creates a conflict of interest, as CIO Capital has a financial incentive to recommend the third-party adviser over others who may not offer such compensation. To mitigate this conflict, CIO Capital conducts due diligence on the referred advisers and discloses the referral arrangement to clients at the time of the referral. Clients are not charged any additional fees due to this referral arrangement.

ITEM 15 – CUSTODY

Pursuant to Rule 206(4)-2, we are deemed to have custody of Client account's funds and securities because (i) we may debit fees directly from the accounts of such Clients and/or (ii) certain Clients have executed a letter or instruction or similar asset transfer authorization arrangement with a qualified custodian whereby we are authorized to withdraw Client funds or securities maintained with a qualified custodian upon our instruction to the qualified custodian (each, an "SLOA"). The terms of each such SLOA are consistent with the terms described in the February 21, 2017 letter of the Chief Counsel's Office of the Securities and Exchange Commission clarifying custody with respect to a standing letter of instruction or other similar asset transfer authorization arrangement established by a client with a qualified custodian. As a result, with respect to transfers of funds and securities between Client accounts and to third-parties, Client accounts will not be subject to independent verification (i.e., a surprise exam).

Where it is determined that we or a member of our firm has custody of client funds other than for the reasons described above, those accounts will be subject to independent verification in the form of a surprise exam by an independent auditing firm.

Clients have access to their portfolio holdings and activity on a continuous basis by logging into their qualified custodial accounts via secure login and password. In addition, the qualified custodian of each Client account sends, unless the Client opts out, or makes available, on a quarterly basis or more frequently, account statements directly to each Client. We urge Clients to carefully review these account statements from their qualified custodians and compare the information therein with any financial statements or information received or made available to Clients through us.

ITEM 16 – INVESTMENT DISCRETION

As noted in Item 4, CIO Capital's business model involves providing discretionary asset management to its Clients. At the commencement of the relationship and for each new account, each Client executes an IMA which grants CIO Capital authority to execute trades in the account. CIO Capital cannot execute trades on margin or in options without further written Client approval.

In addition, under certain conditions, CIO Capital, if requested by its Clients, will provide non-discretionary asset management services. Under this relationship, the Client initiates and CIO Capital executes trades in the account.

ITEM 17 – VOTING CLIENT SECURITIES

CIO Capital will not accept authority to vote a Client's securities. Clients will receive proxies or other solicitations directly from their respective custodian.

ITEM 18 – FINANCIAL INFORMATION

Registered investment advisers are required in this Item to provide clients with certain financial information or disclosures about their financial condition. CIO Capital has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients and has not been the subject of a bankruptcy proceeding.