

FORM ADV PART 2 CLIENT BROCHURE

JIMUSTOCK SECURITIES, LLC

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Form ADV Part 2A

Client Brochure

November 15, 2015

This brochure (“Brochure”) provides information about the qualifications and business practices of Jimustock Securities, LLC. (“JIMU”), a registered investment adviser. Registration does not imply a certain level of skill or training but only indicates that JIMU has registered its business with federal regulatory authorities, including the United States Securities and Exchange Commission (our CRD# 269900). 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.

If you have any questions about the contents of this Brochure, please contact us at +86 18669108777 or barry.freeman@jimubox.com. Additional information about JIMU is also available on the SEC’s website at www.adviserinfo.sec.gov.

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Item 2 - Material Changes

This Brochure, dated November, 2015, and is prepared in accordance with the SEC's requirements. Material changes have been made to the following:

Item 4 – Advisory Business

Item 5 – Fees and Compensation

Item 16 – Investment Discretion

Non-material updates that have been included in the brochure to enhance descriptions of the Firm's programs.

JIMU will ensure that you receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year. Furthermore, JIMU will provide you with other interim disclosures about material changes as necessary.

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Item 4 - Advisory Business

A. General Description of the Firm

JIMU is an investment advisory services firm registered with the Securities and Exchange Commission (“SEC”). JIMU is a Robo Advisor and offers clients two options – advisory portfolio management services and client self-direct trading. Both services are provided via JIMU’s proprietary platform. Additional information about JIMU’s products and services is provided on the SEC website Form ADV Part 1 of JIMU’s <http://www.adviserinfo.sec.gov>. We encourage visiting our website www.Jimustock.com for additional information.

B. Summary of JIMU’s Advisory Services

As stated above, JIMU offers clients two non-discretionary investment options using JIMU’s proprietary technology:

- 1) Jimu Asset Allocator**
- 2) Jimustock Self-Direct**

Jimu Asset Allocator – JIMU offers investment advisory (non-discretionary) services to clients by providing access to affordable, professional portfolio management. Each client’s customized portfolio is created to be in alignment with clients’ acceptable risk parameters and financial objectives. JIMU will develop a customized investment program and guide the Client’s investments by recommending:

- A customized portfolio of Exchange Traded Funds (“ETFs”);
- Jimu Asset Allocator recommendations do not include margin (leverage) or options;

JIMU Asset Allocator is a proprietary program which will recommend how much a client should allocate to each investment program based upon JIMU’s review of a client’s financial resources and risks. **The client is free to decide whether to act upon or ignore the recommendations.**

JIMU begins by assessing a client’s risk profile through an online questionnaire via the JIMU website. The questionnaire which gauges the client’s desire to maximize returns vs. their desire to minimize losses. Once the risk profile is established, the client may invest in a customized portfolio (ranging from highly conservative to very aggressive) maintained by JIMU. If Client accepts the recommendation, the trade will be executed through JIMU’s preferred brokerage firm, Apex’s Clearing Corporation, a non-affiliated, US registered broker-dealer firm.

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The JIMU website allows clients to update their risk profiles online, and this will typically effect a change in their portfolio composition based upon the new risk profile. JIMU provides clients with a dedicated login to its website where clients can view their holdings and their account history. JIMU rebalances each client's portfolio on a periodic basis to realign the portfolio to the desired weighting across investments.

JIMU tailors its service to the individual needs of each of its Clients. To tailor its portfolio offering to each Client, JIMU uses a process that identifies key elements of the client's investing profile.

In its management of clients' portfolios, JIMU will seek to ensure that the following conditions are met and maintained:

- JIMU will advise each client's account on the basis of the client's financial situation and investment objectives and any reasonable investment restrictions the client may impose;
- The client will notify JIMU in writing if there have been changes in the client's financial situation or investment objectives and whether the client wishes to impose reasonable investment restrictions or modify existing restrictions. JIMU will be reasonably available to consult with the client;
- Each client will receive a monthly statement with a description of all account activity.

JIMU will recommend clients' buy or sell ETFs consistent with analysis designed to seek an investment return suitable to the investment objectives and goals of each distinct clients' account. JIMU recommends a suitable course of action by performing a review of each client's individual account and suitability parameters. This review may include type of account, investment objectives, overall financial condition, personal and business assets, risk tolerance, and other factors unique to the individual client's situation. Based on client suitability parameters, JIMU will recommend to the client a customized investment portfolio. JIMU provides investment advice on an advisory (non-discretionary) basis only. Periodic reviews of the client's investment program may result in the client's program being revised, from time to time.

Clients must notify JIMU of specific Restricted Securities they are prohibited from investing in. If a client instruct JIMU not to purchase certain Restricted Securities, JIMU will recommend an alternate Security to purchase on your behalf. You shall notify JIMU immediately if you consider any investments to violate such restrictions

Jimustock Self-Direct – JIMU's "Jimustock Self-Direct" product enables the Client to trade independently of JIMU's Jimu Asset Allocator product, and is a separate and distinct product offered by JIMU. A Client of Jimustock Self-Direct shall be provided with direct access to JIMU's proprietary technology and access to JIMU's preferred brokerage firm, Apex Clearing Corporation. Apex is a non affiliated, U.S. registered broker-dealer firm. Jimustock Self-Direct clients can place trades in ETFs, Mutual Funds and single securities with a market value of greater than \$1.00 USD. Client **shall be solely responsible for all investment decisions** and reinvestment of those assets that comprise

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Client's Jimustock Self-Direct account. Jimustock Self-Direct Clients are not be subject to JIMU's management and or management fees.

C. Assets Under Management

As disclosed in JIMU's Form ADV Part 1, JIMU is presently a start-up and has \$ 0 in client assets under management on a discretionary or non-discretionary basis.

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Item 5 - Fees and Compensation

A. Advisory Fees

Jimu Asset Allocator - JIMU is a “fee based” investment advisor. JIMU is compensated by charging a fee based on the ending market value of a Client’s Account. JIMU reserves the right, in its sole discretion, to negotiate the advisory fee for certain Client Accounts for any period of time determined by JIMU. In addition, JIMU may reduce or waive its fees for the Accounts of some Clients without notice to, or fee adjustment for, other Clients.

JIMU’s investment service charges an annualized fee of 0.50% on a Client’s assets under management. Annual fees are charged on a quarterly basis, in arrears.

Client authorizes Apex Clearing Corporation, the custodian of the Assets to charge the Account for the amount of JIMU’s fee and to remit such fee electronically to JIMU in accordance with required regulatory procedures

Other than its advisory fee described above, neither JIMU nor its employees receive or accept any direct or indirect compensation related to investments that are purchased or sold for Client Accounts. This means that Clients will not be sold products or services that create additional fees or compensation to benefit JIMU or its employees or its affiliates other than those described in this Brochure and on the Site.

Jimustock Self-Direct – JIMU **shall not receive an advisory or management fees** for providing access to the Jimustock Self-Direct.

B. Other Account Fees

JIMU’s fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the client, if so charged by broker-dealer. Clients may incur certain charges imposed by custodians, brokers, third party investment and other third parties such as fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions.

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Exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to JIMU's fee, and JIMU does not receive any portion of these commissions, fees, and costs.

The issuer of some of the securities or products we purchase for Clients, such as ETFs or other similar financial products, may charge product fees that affect Clients. JIMU does not charge these fees to Clients, and does not benefit directly or indirectly from any such fees. An ETF typically includes embedded expenses that may reduce the fund's net asset value, and therefore directly affect the fund's performance and indirectly affect a Client's portfolio performance or an index benchmark comparison.

Jimustock Self-Direct – JIMU **shall not receive an advisory or management fees** for providing access to the Jimustock Self-Direct. Apex Clearing Corporation will charge Jimustock Self-Direct client a commission based upon the clients' trading activity. APEX will charge Jimustock Self-Direct clients' the greater of \$.99 or \$.005 per share. APEX reserves the right to waive the above referenced commission for a trial period or change the commission rate in the future.

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

JIMU does not charge performance-based fees. JIMU's fees are not charged on the basis of a share of capital gains upon or capital appreciation of clients' accounts.

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Item 7 - Types Of Clients

Jimu Asset Allocator - JIMU investment advisory programs is available to individuals (which includes all Natural Persons) via the Jimu Asset Allocator. There presently is a \$1,000.00 USD minimum required to open an investment advisory account with Jimu Asset Allocator. At any time, a Client may terminate an Account, or withdraw all or part of an Account, or update her investment profile, which may initiate an adjustment in the Accounts' holdings. In that case, unless otherwise directed by the Client, JIMU may sell the securities in the Client Account (or portion of the Account, in the case of a partial withdrawal or update) at market prices at the time of the termination, withdrawal or update.

Jimustock Self-Direct – JIMU's access to their self-directed trading platform is available to individuals (which includes all Natural Persons) via the Jimustock Self-Direct product. There is presently a \$1,000.00 USD minimum required to open a Jimustock Self-Direct Account.

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

Jimu Asset Allocator provides Clients with non-discretionary investment advice that is based on Modern Portfolio Theory (MPT). MPT attempts to maximize a portfolio's expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, by selecting the proportions of various asset classes rather than selecting individual securities.

Typically rigorous MPT-based financial advice has only been available through high-end financial advisors who typically require minimum account sizes of at least \$1 million and charge annual fees of at least 1% of assets under management.

To employ MPT properly, one must start with an accurate determination of an individual's objective and subjective tolerance for risk. Achieving accuracy requires sophisticated algorithms applied to more detailed questions than are typically asked by advisors. Based on this risk analysis, JIMU seeks to create an individualized investment plan using the optimal asset classes in which to invest, the most efficient and inexpensive securities to represent each of those asset classes, and the ideal mix of asset classes based on the Client's specific risk tolerance.

JIMU periodically reviews a very broad population of securities to identify the most appropriate securities to represent each asset class. JIMU continuously monitors our Clients' portfolios and periodically rebalances them back to the Clients' target mix in an effort to optimize returns for the intended level of risk.

Jimustock Self-Direct - JIMU **does not provide investment advice** to clients of Jimustock Self-Direct product Jimustock Self-Direct is a non-discretionary program. Clients are solely responsible for all investment decisions and trades. JIMU provides Jimustock Self-Direct clients with access to their proprietary platform for trade execution through Apex Clearing Corporation.

Risk Considerations

JIMU cannot guarantee any level of performance or that any Client will avoid a loss of Account assets. Any investment in securities involves the possibility of financial loss that Clients should be prepared to bear.

When evaluating risk, financial loss may be viewed differently by each Client and may depend on many different risk items, each of which may affect the probability of adverse consequences and the magnitude of any potential losses. The following risks may not be all-inclusive, but should be considered carefully by a prospective Client before retaining JIMU's services. These risks should be considered as possibilities, with additional regard to their actual probability of occurring and the effect on a Client if there is in fact an occurrence.

Market Risk - The price of any security or the value of an entire asset class can decline for a variety of reasons outside of JIMU's control, including, but not limited to, changes in the

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macroeconomic environment, unpredictable market sentiment, forecasted or unforeseen economic developments, interest rates, regulatory changes, and domestic or foreign political, demographic, or social events. If a Client has a high allocation in a particular asset class it may negatively affect overall performance to the extent that the asset class underperforms relative to other market assets. Conversely, a low allocation to a particular asset class that outperforms other asset classes in a particular period will cause that Client Account to underperform relative to the overall market.

Advisory Risk -There is no guarantee that JIMU's judgment or investment decisions about particular securities or asset classes will necessarily produce the intended results. JIMU's judgment may prove to be incorrect, and a Client might not achieve his or her investment objectives. JIMU may also make future changes to the investing algorithms and advisory services that it provides. In addition, it is possible that Clients or JIMU itself may experience computer equipment failure, loss of internet access, viruses, or other events that may impair access to JIMU's software based financial advisory service. JIMU and its representatives are not responsible to any Client for losses unless caused by JIMU breaching its fiduciary duty.

Volatility and Correlation Risk - Clients should be aware that JIMU's asset selection process is based in part on a careful evaluation of past price performance and volatility in order to evaluate future probabilities. However, it is possible that different or unrelated asset classes may exhibit similar price changes in similar directions which may adversely affect a Client, and may become more acute in times of market upheaval or high volatility. Past performance is no guarantee of future results, and any historical returns, expected returns, or probability projections may not reflect actual future performance.

Liquidity and Valuation Risk -High volatility and/or the lack of deep and active liquid markets for a security may prevent a Client from selling her securities at all, or at an advantageous time or price because JIMU and the Client's Broker may have difficulty finding a buyer and may be forced to sell at a significant discount to market value. Some securities that hold or trade financial instruments may be adversely affected by liquidity issues as they manage their portfolios. While JIMU values the securities held in Client Accounts based on reasonably available exchange-traded security data, JIMU may from time to time receive or use inaccurate data, which could adversely affect security valuations, transaction size for purchases or sales, and/or the resulting advisory fees paid by a Client to JIMU.

Credit Risk - JIMU cannot control and Clients are exposed to the risk that financial intermediaries or security issuers may experience adverse economic consequences that may include impaired credit ratings, default, bankruptcy or insolvency, any of which may affect portfolio values or management. This risk applies to assets on deposit with any Broker utilized by Client, notwithstanding asset segregation and insurance requirements that are beneficial to Broker clients generally. In addition, exchange trading venues or trade settlement and clearing intermediaries could experience adverse events that may temporarily or permanently limit trading or adversely affect the value of Client securities. Finally, any issuer of securities may experience a credit event that could impair or erase the value of the issuer's securities held by a Client. JIMU seeks to limit credit risk by generally adhering to the purchase of securities, which are subject to regulatory limits on asset segregation and leverage such that fund

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shareholders are given liquidation priority versus the fund issuer; however, certain funds and products may involve higher issuer credit risk because they are not structured as a registered fund.

Legislative Risk - Performance may directly or indirectly be affected by government legislation or regulation, which may include, but is not limited to: changes in investment advisor or securities trading regulation; change in the U.S. government's guarantee of ultimate payment of principal and interest on certain government securities. JIMU does not engage in financial or tax planning, and in certain circumstances a Client may incur taxable income on her investments without a cash distribution to pay the tax due.

Foreign Investing and Emerging Markets Risk - Foreign investing involves risks not typically associated with U.S. investments, and the risks may be exacerbated further in emerging market countries. These risks may include, among others, adverse fluctuations in foreign currency values, as well as adverse political, social and economic developments affecting one or more foreign countries. In addition, foreign investing may involve less publicly available information and more volatile or less liquid securities markets, particularly in markets that trade a small number of securities, have unstable governments, or involve limited industry. Investments in foreign countries could be affected by factors not present in the U.S., such as restrictions on receiving the investment proceeds from a foreign country, foreign tax laws or tax withholding requirements, unique trade clearance or settlement procedures, and potential difficulties in enforcing contractual obligations or other legal rules that jeopardize shareholder protection. Foreign accounting may be less transparent than U.S. accounting practices and foreign regulation may be inadequate or irregular.

ETF Risks, including Net Asset Valuations and Tracking Error - ETF performance may not exactly match the performance of the index or market benchmark that the ETF is designed to track because 1) the ETF will incur expenses and transaction costs not incurred by any applicable index or market benchmark; 2) certain securities comprising the index or market benchmark tracked by the ETF may, from time to time, temporarily be unavailable; and 3) supply and demand in the market for either the ETF and/or for the securities held by the ETF may cause the ETF shares to trade at a premium or discount to the actual net asset value of the securities owned by the ETF. Certain ETF strategies may from time to time include the purchase of fixed income, commodities, foreign securities, American Depositary Receipts, or other securities for which expenses and commission rates could be higher than normally charged for exchange-traded equity securities, and for which market quotations or valuation may be limited or inaccurate.

Clients should be aware that to the extent they invest in ETF securities they will pay two levels of advisory compensation - advisory fees charged by JIMU plus any management fees charged by the issuer of the ETF. This scenario may cause a higher advisory cost (and potentially lower investment returns) than if a Client purchased the ETF directly.

An ETF typically includes embedded expenses that may reduce the fund's net asset value, and therefore directly affect the fund's performance and indirectly affect a Client's portfolio performance or an index benchmark comparison. Expenses of the fund may include investment advisor management fees, custodian fees, brokerage commissions, and legal and accounting fees. ETF expenses may change from time to time at the sole discretion of the ETF issuer. JIMU

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discloses each ETF's current information, including expenses, on the Site. ETF tracking error and expenses may vary.

Inflation, Currency, and Interest Rate Risks - Security prices and portfolio returns will likely vary in response to changes in inflation and interest rates. Inflation causes the value of future dollars to be worth less and may reduce the purchasing power of an investor's future interest payments and principal. Inflation also generally leads to higher interest rates, which in turn may cause the value of many types of fixed income investments to decline. In addition, the relative value of the U.S. dollar-denominated assets primarily managed by JIMU may be affected by the risk that currency devaluations affect Client purchasing power.

Leverage - JIMU may recommend leveraged ETFs for a clients' portfolios. This can amplify exposure to the market, meaning that a percentage of market loss may be greater in a client's portfolio.

Short Positions - JIMU may recommend client's short a security. With a short position, the potential for loss is unlimited.

Derivatives - JIMU may recommend the use of options within client portfolios. Options can serve to mitigate risk, but they can also enhance risk by amplifying losses.

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Item 9 - Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of JIMU or the integrity of JIMU's management. We do not have any legal, financial, regulatory, or other "disciplinary" item to report to any Client. This statement applies to our firm and to every employee of our firm

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Item 10 - Other Financial Industry Activities and Affiliations

JIMU does not have any Financial Industry activities to disclose at this time.

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

JIMU has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at JIMU must acknowledge the terms of the Code of Ethics annually, or as amended.

JIMU anticipates that, in appropriate circumstances, consistent with clients' investment objectives, it will cause accounts over which JIMU has advisory authority to effect the purchase or sale of securities in which JIMU, its management persons and/or clients, directly or indirectly, have a position of interest. JIMU's employees and persons associated with JIMU are required to follow JIMU's Code of Ethics. Subject to satisfying this policy and applicable laws, officers, directors and employees of JIMU and its employees may trade for their own accounts in securities which are recommended to and/or purchased for JIMU's clients. The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of JIMU will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code certain classes of securities have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of JIMU's clients. Employee trading is continually monitored under the Code of Ethics, and to reasonably prevent conflicts of interest between JIMU and its clients.

Employees' accounts may trade in the same securities with client accounts on an aggregated basis when consistent with JIMU's obligation of best execution. In such circumstances, employee and client accounts will share commission costs equally and receive securities at a total average price. JIMU will retain records of the trade order (specifying each participating account) and its allocation, which will be completed prior to the entry of the aggregated order. Completed orders will be allocated as specified in the initial trade order. Partially filled orders will be allocated on a pro rata basis. Any exceptions will be explained on the Order.

It is JIMU's policy that the firm will not affect any principal or agency cross securities transactions for client accounts. JIMU will also not cross trades between client accounts

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Item 12 - Brokerage Practices

JIMU directs all its brokerage and custody of client assets to Apex Clearing Corporation (Apex). Apex provides trade execution and clearing services in addition to traditional brokerage and custody services.

JIMU will seek the best execution of transactions for Client Accounts consistent with its judgment as to the business qualifications of Apex or other Brokers. "Best execution" means the best overall qualitative execution, not necessarily the lowest possible commission cost. Accordingly, the factors that JIMU considers when selecting or recommending Brokers are matters that directly benefit Client Accounts, and consistent with obtaining the best execution of their transactions. These factors include: execution capability and available liquidity; timing and size of particular orders; commission rates; responsiveness; trading experience; reputation, integrity and fairness in resolving disputes; quality of their application programming interfaces and technology; and other factors.

JIMU does not engage in any "soft dollar" practices involving the receipt of research or other brokerage service in relation to client commission money, nor do we receive any research or other products in connection with Client transactions. JIMU also does not use Client commission money to compensate or otherwise reward any brokers for client referrals.

JIMU may, but is not required to, aggregate orders for a Client's Account with orders of other Clients. JIMU may aggregate securities sale and purchase orders for a Client with similar orders being made contemporaneously for other Client Accounts. In such event, the average price of the securities purchased or sold in such a transaction may be determined and a Client may be charged or credited, as the case may be, the average transaction price. As a result, however, the price may be less favorable to the Client than it would be if similar transactions were not being executed concurrently for other Accounts.

JIMU may use block trades when advantageous to clients. Block trades permits the trading of aggregate blocks of securities composed of assets from multiple client accounts so long as transaction costs are shared equally and on a pro-rated basis between all accounts included in any such block. Block trading allows JIMU to execute trades in a more timely, equitable manner and to reduce overall commission charges to clients.

JIMU does not have any arrangements to compensate any broker dealer for client referrals

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Item 13 - Review of Accounts

JIMU provides all clients with continuous access to the website regarding information about account status, portfolio allocations, securities, and balances. Proprietary as well as commercially available software is used to review the portfolios quarterly to ensure that they are in line with investment objectives. Additional reviews may be triggered by material changes in variables such as a client's individual circumstances, or the market, political or economic environment.

Clients have access to current account balances and positions through the JIMU website. Apex prepares account statement showing all transactions and account balances during the prior quarter. All information relating to Client accounts are provided on the JIMU website and/or sent via email, as agreed to with each client at the time of their account opening. On a quarterly basis, JIMU may review each Client account and remind them to review and update the profile information previously provided. JIMU requests that Clients reconfirm their current profile information as needed and on an annual basis. JIMU conducts reviews when material changes may have occurred to a Client's portfolio or investment objectives. JIMU will retain the client account review documentation in its database. We consider implications and the volatility associated with each of our chosen asset classes when deciding when and how to rebalance.

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Item 14 - Client Referrals and Other Compensation

JIMU does not presently pay for third-party client referrals.

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Item 15 - Custody

JIMU does not maintain custody of any Client funds or securities. JIMU has selected Apex to custody client assets.

Each Client will receive Account information, including trade confirmations and monthly account statements, directly from Apex or by logging into their account. Each Client should carefully review this information and compare it with information provided by JIMU when they are evaluating Account performance, securities holdings, and transactions.

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Item 16 - Investment Discretion

JIMU does not accept investment discretion from client of Jimu Asset Allocator program or Jimustock Self-Direct.

Jimu Asset Allocator – Upon execution of an Investment Advisory (non-discretionary) Agreement, and the creation of a client profile, JIMU will recommend the identity and amount of securities to be bought or sold, and timing of transactions. JIMU recommends include ETFs, Mutual Funds and single securities with a market value of over \$1.00 USD. JIMU recommendations do not include the use of options and/or margin. As an advisory relationship, Client is free to accept or ignore JIMU's recommendations. If the client authorizes the transactions, the transactions will be exercised in a manner consistent with the stated investment objectives for the particular client account. JIMU will have discretion as to the time of transactions.

Jimustock Self-Direct - Through the Jimustock Self-Direct **Client shall be solely responsible for all investment decisions** and reinvestment of those assets that comprise Client's Jimustock Self-Direct account. Jimustock Self-Direct is not be subject to JIMU's management. Jimustock Self-Direct platform provides clients with access to transactions in ETFs, Mutual Funds and single securities with a market value of over \$1.00 USD.

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Item 17 - Voting Client Securities

As a matter of firm policy and practice, JIMU does not have any authority to and does not vote proxies on behalf of Jimu Asset Allocator or Jimustock Self-Direct Clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. Clients will receive proxies and other solicitations directly from the designated custodian.

JIMU will neither advise nor act on behalf of the client in legal proceedings involving companies whose securities are held or previously were held in the client's account(s), including, but not limited to, the filing of "Proofs of Claim" in class action settlements.

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Item 18 - Financial Information

JIMU does not require or solicit the prepayment of any advisory fees, and does not have any adverse financial condition that is reasonably likely to impair our ability to continuously meet our contractual commitments to our Clients.

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about an adviser's financial condition. JIMU 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

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Item 19 - Privacy Policy

JIMU does not disclose nonpublic personal information about its clients or former clients to any persons other than as described below. JIMU collects information about its clients (such a name, address, social security number, assets and income) from its website, discussions with clients, from documents that clients may deliver to JIMU (such as account applications) and in the course of providing services. In order to service its client accounts and effect client transactions, JIMU may provide client personal information to its affiliates and to firms that assist it in servicing client accounts and which have a need for such information. JIMU does not otherwise provide information about its clients to outside firms, organizations or individuals except as required by law. Any party that receives this information will use it only for the services and as allowed by applicable law or regulations, and is not permitted to share or use this information for any other purpose.