

Item 1 – Cover Page

FlexAdvisor LLC

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Form ADV Part 2A Appendix 1

Wrap Fee Program Brochure

August 2018

This brochure provides information about the qualifications and business practices of FlexAdvisor LLC (“FlexAdvisor”, “us”, “we”, “our”). If you (“your”, “clients”) have any questions about the contents of this brochure, please contact us at (646) 508-7883 and/or rodrigo.garza@flexinvest.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or by any state securities authority. Our CRD number is 298308.

We have applied for registration as investment adviser with the SEC. Our registration as an Investment Adviser will not imply any level of skill or training. Additional information will be available on the SEC’s website at www.adviserinfo.sec.gov (click on the link, select “Investment Adviser Search” and type in our firm name). The results will provide you with both Parts 1 and 2 of our Form ADV.

Item 2 – Material Changes

FlexAdvisor LLC (“FlexAdvisors”) has filed an initial registration as an Internet advisor with the Securities and Exchanges Commission (“SEC”).

The Wrap Brochure will be available on the SEC’s public disclosure website (“IAPD”) at www.adviserinfo.sec.gov, or you may contact our Chief Compliance Officer, Catalina Rey at the telephone number shown on the cover page of this Wrap Brochure to request for a copy.

When an update is made to this Wrap Brochure, we will send you a copy that includes a summary of material changes, or we will send you a summary of material changes and offer to provide you a copy of the complete Wrap Brochure electronically or in paper form.

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Item 4 – Services, Fees and Compensation

A. Description of the advisory firm

FlexAdvisor LLC (“FlexAdvisor”) is a limited liability company organized under the laws of the State of Delaware on May 18, 2018 and wholly owned by Jose Carlos Gonzalez CRD # 4346462. We have applied for registration as Investment Advisor with the SEC and will notice file with the appropriate states in which notice filings are required to provide the investment advisory services as described within this document.

At FlexAdvisor we will provide non-discretionary investment advisory services, which are offered to clients and prospective clients of the firm via web-based solutions and online informational resources. FlexAdvisor will provide all investment advisory services exclusively through virtual interaction conducted over the Internet. FlexAdvisor does not offer financial planning services, tax advice, or legal advice. This Disclosure Brochure provides clients with information regarding our qualifications, business practices, and advisory services.

Please contact our Chief Compliance Officer, if you have any questions about this Brochure.

A. Type of Advisory Services

FlexAdvisor will provide non-discretionary investment advice to clients solely through a technology platform developed and maintained by FlexInvest Securities, Inc. (“FlexInvest Securities”), an affiliate of FlexAdvisor, that is available through FlexInvest’s website and mobile application. FlexAdvisor does not provide investment advice in person, over the phone, in live chat, or in any other manner other than through the website and the mobile application. Each client is solely responsible for implementing such advice, rebalancing portfolios, allocating assets and in general, managing their own accounts.

FlexAdvisor has an arrangement with Apex Clearing Corporation, a registered broker-dealer unaffiliated with FlexAdvisor (“Apex”), through which clearing and custody services are provided to clients. Brokerage services are provided through FlexAdvisor’s affiliated broker-dealer, FlexInvest Securities, LLC. Apex and FlexInvest Securities are FINRA and SIPC members¹, and independent SEC registered broker-dealers.

FlexAdvisor’s clients will be required to sign an investment advisory agreement agreeing to the fees to be paid and all the conditions of the relationship with FlexAdvisor. The investment advisory agreement may be terminated by either party, at any time, by written notice. Termination of the agreement will not affect (a) the validity of any actions previously

¹ FlexAdvisor is not, nor required to be, a FINRA or SIPC member. Information about the Financial Industry Regulatory Authority (FINRA) may be found on its website, www.finra.org. Clients may learn more about the Securities Investor Protection Corporation (SIPC) and how it serves member firms and the investing public by visiting its website at www.sipc.org.

² Access person means any of your supervised persons who has access to nonpublic information regarding any clients’ purchase or sale of

taken by us under the agreement; (b) liabilities or obligations of the parties from transactions initiated before termination of the agreement; or (c) client's obligation to pay the advisor fees (pro-rated through the date of termination).

Clients participation in the Wrap Fee Program (**"Wrap Fee Participants"**) will require clients to establish a brokerage account with FlexInvest Securities and enter into an agreement whereby Apex will act as the clearing broker and qualified custodian for clients' FlexInvest Securities account.

Clients should know that in addition to the Wrap Fee Program, FlexAdvisor offers investment advisory services to those clients that wish to implement our investment strategies using their existing brokerage accounts at other custodians unrelated to FlexAdvisor by purchasing the recommended Portfolios available in our online platform (**"Non-Wrap Fee Participants"**). Details of these services can be found in our website, mobile application, and in our form ADV Part 2 A (Brochure).

B. Wrap Fee Program Description

A Wrap Fee Program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and other administrative fees. We sponsor a Wrap Fee Program to clients, which means FlexAdvisor will wrap third party fees (i.e., custodian fees, brokerage fees, transaction fees, etc.) in one single fee.

FlexAdvisor via the website or the mobile application, reviews the clients' investment needs, tracks assets under management, provides financial educational, and based on each client's risk tolerance, investment objectives, and time horizon will provide investment recommendations. Our website and mobile application provide clients with automated educational guidance about investing and about investment portfolio management that will allow them to build an strategy that meets their investment objectives, financial needs, time horizon and risk tolerance.

As part of the registration process, each client inputs personal information, including age, financial resources, and investment objectives as responses to an interactive questionnaire. The website and the mobile application use an Algorithm to analyze such information to provide the client with access to a list of suitable investments and investment recommendations. FlexAdvisor's recommended Portfolios for Wrap Fee Participants are classified in three different groups:

- 1. FlexAdvisor's Created Portfolios:** These are portfolios created by the FlexAdvisor's professional team or portfolios in partnership with Moodys. Additional details regarding Methods of Analysis, Investment Strategies and Risk of Loss in Item 8 hereinbelow.
- 2. Institutional Partners Portfolios:** These are portfolios created by our institutional partners. FlexAdvisor has agreements with certain Registered Investment Advisors

that utilize our platform to publish their owned balanced Portfolios and to make those Portfolios available to FlexAdvisor's clients for purchase. FlexAdvisor conducts an extensive due diligence on the Institutional Partner before entering into an agreement with them. FlexAdvisor will also conduct periodic reviews of the partner's Portfolios to ensure they meet FlexAdvisors investment guidelines.

- 3. Create your own Portfolio (DIY):** These options provides the client with the ability to create their own portfolio.

The Algorithm relies on the answers provided in the questionnaire and based on the input received from these answers the Algorithm generates a risk classification that coincides with the risk classification of the recommended portfolios. Consequently, clients are responsible for updating their information promptly should there be any changes in answers to questions in the questionnaire. Clients should also be aware that FlexAdvisor does not utilize the entirety of all information provided in the questionnaire nor does it consider additional information about the client not covered in the questionnaire. Although, FlexAdvisor is responsible for maintaining the Algorithm, FlexAdvisor does not override the Algorithm to provide specific recommendations to any client. While FlexAdvisor encourages clients to follow our recommendations, clients are not required to follow all recommendations. Clients are responsible for any decision to invest by utilizing any investment strategy available through our website or mobile application. Additionally, clients may cause the Algorithm to generate new recommendations at any time by changing the answers they provide through the questionnaire. The implementation of investment strategies within the website or application that do not coincide with the recommended strategies may be subject to certain restrictions in the implementation. Clients who implement an investment decision that is outside the scope of any recommendation should understand that such decision may not be suitable and that their portfolio may perform worse over any time horizon than a portfolio built according to any recommendation or any other investment strategy. FlexAdvisor encourages clients to carefully review and consider the information available in our website and application about our recommended portfolios, including but not limited to fact sheets, ETF prospectus, and any available public company filing or reports before making any investment decision.

Our portfolios consist mainly of single stock equities. FlexAdvisor's reserves the right to change, from time to time, in its sole discretion and without prior notice to clients the number of investments it deems appropriate to address clients' investment needs and available investments.

The Single Stock shares purchased or sold in a FlexInvest Securities account may be either whole shares or fractional shares, depending upon the amounts a client invests in any particular Single Stock. FlexAdvisor will allow its clients to invest in dollar-based quantities, whereby a client can buy a fixed dollar amount rather than whole shares ("Fractional Shares"). FlexAdvisor aggregates all dollar-based purchases, and FlexInvest Securities places whole share orders for executions. Thereafter, FlexInvest Securities allocates the fractional shares to the individual FlexInvest Securities accounts.

Clients should be aware that FlexInvest Securities will execute fractional shares trades against its proprietary account ("Proprietary transaction"). We encourage clients to understand Fractional Shares before entering into this type of transactions.

To the extent that FlexInvest Securities trades fractional shares of any Single Stock on behalf of clients, it does so by allocating any excess fractional shares to FlexInvest Securities's fractional facilitation account held by Apex, and FlexInvest Securities in turn accumulates fractional shares and manages its fractional facilitation account through trades in whole share quantities in accordance with FlexInvest Securities and Apex's policies and procedures as they pertain to management of such accounts and positions. FlexAdvisor, FlexInvest Securities, and Apex each reserves the right, at any time and each in its sole discretion, without prior notice to clients, to change the details of the policies and procedures governing the mechanics of trading fractional shares, including, without limitation, allocation calculation and rounding procedures. Fractional shares are typically unrecognized and illiquid outside of a FlexInvest Securities account and, as a result, fractional shares may not be marketable or transferrable to another brokerage account. In the event of a liquidation or transfer of the assets in a FlexInvest Securities account to another account, FlexInvest Securities may convert such fractional shares to cash.

C. Fees and Compensation

FlexAdvisor offers a wrap fee program that bundles different services together. Consequently, FlexAdvisor charges a single fee of 25 bps that covers the investment advisory services provided by FlexAdvisor and the custody, administrative, and brokerage services provided by Apex and/or FlexInvest Securities. Commissions charged by Apex for trade execution will be absorbed by the Firm.

Our fee of 25 bps is charged monthly in arrears, and is computed based on the month-end asset under management of the client's account. In addition to the single flat fee, FlexAdvisor will charge \$2 for paper confirmations and \$5 for paper statements. If a client's account is terminated during the month, our fees will be prorated based on the number of days for which services were provided. Advisory fees are usually non-negotiable at the discretion of the Firm. Advisory fees are withdrawn directly from the client's accounts with client's written authorization. The custodian will be advised accordingly in writing of this authorization.

In addition to the single fee, clients will pay a fee for the purchase of Institutional Partners Portfolios to be implemented in the FlexInvest Securities accounts. Clients will be duly informed of the price of the Portfolio prior to the purchase and implementation of the strategy. It is Institutional Partners will share with FlexAdvisors a percentage of the price charged to the client for the purchase of the Portfolio. Therefore, FlexAdvisor has an incentive in recommending Institutional Portfolios to clients. However, this conflict of

interest is mitigated because the Algorithm generates the recommendations based on the clients' answers to the questionnaire.

D. Cost Factors

The program may cost the client more or less than purchasing such services separately. Several factors such as trading activity in the client's account, the cost of the services provided by third parties may affect the affect the relative cost of the Wrap Fee program.

E. Additional Fees

Clients who participate in the Wrap Fee Program will not have to pay for transaction or trading fees. However, clients are still responsible for all other account fees such as transition fees if the account is moved to another broker, or fund fees. Clients would be responsible for any other fees charged by other parties including Apex. A client may incur certain charges imposed by custodians, and other third parties. These include transfer fees, administrative fees and other fees and taxes on brokerage accounts and securities transactions. ETFs also charge internal management fees, which are disclosed in the relevant fund's prospectus.

FlexAdvisor encourages clients to review all fees charged to fully understand the total amount of fees they will pay.

F. Compensation of Client Participation

Neither FlexAdvisor, nor any representatives of FlexAdvisor receive any additional compensation beyond advisory fees for the participation of client's in the wrap fee program. However, compensation received may be more than what would have been received if client paid separately for investment advice, brokerage, and other services. Therefore, FlexAdvisor may have a financial incentive to recommend the wrap fee program to clients.

Item 5 – Account Requirements and Types of Clients

We will provide investment advisory services to individual investors who are United States ("US") citizens, legal US residents or non-resident aliens with eligible visa types, all of which must have a social security number and maintain a checking account with a US bank. We will also provide services to foreign non- US persons.

Participation in the Wrap Fee Program requires that the Client successfully complete a new account application, including submitting various personally identifiable information required by US federal law and international regulations.

We do not impose a minimum account size.

Item 6 – Portfolio Manager Selection and Evaluation

A. Portfolio Managers

FlexAdvisor does not utilize portfolio managers. Clients construct their own portfolios from the list of portfolios available in the platform. FlexAdvisor reviews performance information provided by third party market data providers when selecting the list of recommended portfolios presented through the website and the application. Clients implement their investment strategy themselves and are ultimately responsible for implementing FlexAdvisor's investment advice.

B. Performance-Based Fees and Side-By-Side Management

We do not charge performance-based fees (i.e., advisory fees based on a share of the capital gains or capital appreciation of the assets of a client). Our compensation structure is discussed in detail in Item 4 above.

C. Methods of Analysis

FlexAdvisor uses a proprietary process to help select the single stocks in the recommended portfolios. As part of the process, we analyze securities' performance using historical market data, risk metrics and other benchmarks. Based on such analysis and clients' investment objectives, FlexAdvisor will select the list of recommended portfolios that will be available through the website and the mobile application.

D. Investment Strategies

FlexAdvisor favors long term trading but may resort to short term trading if required by particular circumstances. Our portfolios consist mainly of Single Stocks that are considered suitable and recommended to each client depending on each client's risk profile, investment objectives and time horizon through the website and the application. From time to time, FlexAdvisor will update the investments available in the online platform. An investment can be added, removed, or replaced. When an investment is removed or replaced, it will no longer be available for investment and all positions will be liquidated to cash for reinvestment. Replaced or removed investments will be replaced with similar investments. FlexAdvisors, at its sole discretion, may also reclassify investments if such investments are considered unsuitable to clients.

E. Risks of Loss

FlexAdvisor assigns a risk classification for each of the portfolios in the platform. The system will generate a pop-up window warning clients that elect to buy a portfolio outside of the his or her risk profile. For example, a client considered conservative that elects an aggressive portfolio. Nevertheless, clients have sole discretion in electing their portfolios, and will be allowed to override the pop-up window.

FlexAdvisor also includes ETFs in the recommended portfolios. ETFs are managed by the relevant fund manager. FlexAdvisor does not manage, control or receive compensation from ETF managers.

Investing in securities involves a risk of loss that as a client, should be prepared to bear.

F. ETF Securities Risks

ETFs are managed pooled vehicles that invest in stocks, bonds, short-term money market instruments, other mutual funds, other securities or any combination thereof. ETF performance may not exactly match the performance of the index or market benchmark that the ETF is designed to track because the ETF will incur expenses and transaction costs not incurred by any applicable index or market benchmark, certain securities comprising the index or market benchmark tracked by the ETF may, from time to time, temporarily be unavailable; and supply and demand in the market for either the ETF and 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.

While ETFs generally provide diversification, risks can be significantly increased for funds concentrated in a particular sector of the market, or that primarily invest in small cap or speculative companies, use leverage to a significant degree, or concentrate in a particular type of security rather than balancing the fund with different types of securities. 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.

G. Investment Risk Disclosures

The risks below are disclosed in a good faith effort to inform current and prospective clients of issues that could adversely affect the value of a portfolio. The disclosure below does not attempt to convey that the risks disclosed are the only risks present when investing. Future circumstances may present additional risks to any investment portfolio. There are inherent risks involved for each investment strategy or method of analysis. Investing in securities involves risk of loss, which clients should be prepared to bear.

Market Risk: Our clients are subject to market risks that will affect the value of their portfolios, including adverse issuer, political, regulatory, market or economic developments, as well as developments that have an impact on specific economic sectors, industries or segments of the market.

Investment Style or Class Risk: Specific types of investments and investment classes tend to go through cycles of doing better, or worse, than the stock market in general. These periods have, in the past, lasted for as long as several years.

Growth Risk: The risk of the lack of earnings increase or lack of dividend yield.

Mid-Cap Company Risk: Mid-Cap companies may have narrower commercial markets, less liquidity and less financial resources than Large-Cap companies.

Small-Cap Company Risk: Small-Cap companies may have narrower commercial markets, less liquidity and less financial resources than Mid-Cap or Large-Cap companies.

Sector Risk: The risk of holding an investment in similar businesses or a single investment class, which could all be affected by the same economic or market conditions.

High-Yield Risk: The risk that results from investments in below investment grade bonds, which have a greater risk of loss of money, are susceptible to rising interest rates, and have greater volatility.

Fixed Income Risk: This risk arises if an issuer of a fixed income security is unable to meet its financial obligations or goes bankrupt.

Interest Rate Risk: Investments may be adversely affected by changes in global interest rates.

Foreign Security Risk: The risk of instability in currency exchange rates, political unrest, economic conditions, or foreign law changes.

Emerging Markets Risk: Investing in emerging markets has great political uncertainty, dependence on foreign aid, and a limited number of buyers.

Concentration Risk: Concentration risk results from maintaining exposure to issuers conducting business in a specific industry or related to a specific investment theme. The risk of concentrating investments in a particular industry or tied to a specific theme is that a portion of the client's portfolio will be more susceptible to the risks associated with that industry or theme.

Credit Risk: Credit risk is the risk that an issuer or guarantor of a security or counterparty to a financial instrument may default on its payment obligations or experience a decline in credit quality.

Debt Instrument Risk: Debt instruments may have varying levels of sensitivity to changes in interest rates, credit risk and other factors affecting debt securities. Typically, the value of outstanding debt instruments falls when interest rates rise. The value of debt instruments with longer maturities may fluctuate more in response to interest rate changes than those of instruments with shorter maturities.

Geographic Concentration Risk: Investments in a particular geographic region may be particularly susceptible to political, diplomatic or economic conditions and regulatory requirements. Thus, investments that focus in a particular geographic region may be more volatile than a more geographically diversified fund.

H. Voting Client Securities (i.e., Proxy Voting)

We do not have, nor will we accept authorization to vote client securities. Clients will receive their proxies or other solicitations directly from their custodian or a transfer agent. Clients should contact their custodian or a transfer agent with questions about a particular solicitation.

Item 7 – Client Information Provided to Portfolio Managers

FlexAdvisor has access to clients’ non-public personal information. The website and the mobile application rely on the information provided by the client through the questionnaire in order to provide investment advice. Pursuant to applicable Federal and/or State Privacy Regulations, we maintain the confidentiality of this non-public information on each of our clients.

We must obtain pertinent information and review clients’ financial situation and investment profile, including risk tolerance, to determine and set the appropriate short and long- term investment goals and objectives. We encourage clients to notify us if there have been any changes in financial situation or investment objectives, or if clients wish to impose any reasonable restrictions or modify any existing reasonable restrictions on the management of the account.

Item 8 – Client Contact with Portfolio Managers

We will not place any restrictions on clients’ ability to contact and consult with our support team. However, FlexAdvisor provides investment advice solely through the website and the application.

Item 9 – Additional Information

A. Disciplinary Information

We do not have any legal, financial or other “disciplinary” item to report. We are obligated to

disclose any disciplinary event that would be material to clients when evaluating us to initiate a client / Adviser relationship, or to continue a client /Adviser relationship with us.

B. Other Financial Industry Activities and Affiliations

We are not, nor any of our management persons registered, or have an application pending to register as a broker-dealer, futures commission merchant, commodity pool operator, commodity trading advisor or as an associated person (or registered representative) of the foregoing entities, except as noted below.

FlexInvest Securities LLC d/b/a GWM Group Inc. is an affiliate of with FlexAdvisor due to common control. Jose Carlos Gonzalez is the sole owner of both entities. FlexInvest Securities is a registered broker-dealer member of FINRA and SIPC that will provide brokerage services to FlexAdvisor's clients that participate in the firm's Wrap Fee Program. For additional details of the services please refer to the firms Form ADV Part 2A Appendix 1, Wrap Fee Program Brochure.

FlexInvest Inc. is affiliated to FlexAdvisor due to common control. Jose Carlos Gonzalez is the sole owner of both entities. FlexInvest Inc. is not in the financial industry *per se* but provides support services to FlexAdvisor per an intercompany agreement. These services may include customer service, technical support, marketing functions, operational support, and other administrative services.

The following three entities are affiliated to FlexAdvisor due to common control but their businesses are completely independent from FlexAdvisor's and/or FlexInvest Securities business.

GWM Ltd. is affiliated to FlexAdvisor due to common control. Jose Carlos Gonzalez owns both entities and serves as Chairman and Director of GWM LTD.

Flexfunds Holdings LLC. is affiliated to FlexAdvisor due to common control. Jose Carlos Gonzalez owns 75% of Flexfunds Holdings LLC. and 100% of FlexAdvisor LLC. Jose Carlos Gonzalez serves as Director of Flexfunds.

Leverage Shares Management Co. is affiliated to FlexAdvisor due to common control. Jose Carlos Gonzalez owns 100% of both entities.

C. Code of Ethics

Under the Investment Advisers Act of 1940, FlexAdvisor has adopted and implemented a written Code of Ethics that is tailored to our activities and covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions,

Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions.

The Rules are designed to ensure that our personnel (i) observe applicable legal (including compliance with applicable state and federal securities laws) and ethical standards in the performance of their duties; (ii) at all times place the interests of our clients first; (iii) disclose all actual or potential conflicts; (iv) adhere to the highest standards of loyalty, candor and care in all matters relating to its clients; (v) conduct all personal trading consistent with the Rules and in such a manner as to avoid any actual or potential conflict of interest or any abuse of their position of trust and responsibility; and (vi) not use any material non-public information in securities trading. The Rules also establish policies regarding other matters such as outside employment, the giving or receiving of gifts, and safeguarding portfolio holdings information.

Under the general prohibitions of the Rules, our personnel may not: 1) effect securities transactions while in the possession of material, non-public information; 2) disclose such information to others; 3) participate in fraudulent conduct involving securities held or to be acquired by any client; and 4) engage in frequent trading activities that create or may create a conflict of interest, limit their ability to perform their job duties, or violate any provision of the Rules.

D. Participation or Interest in client Transactions.

Our personnel are required to conduct their personal investment activities in a manner that we believe is not detrimental to our advisory clients. Our personnel are not permitted to transact in securities except under circumstances specified in the Code of Ethics.

A conflict of interest is presented when employees and representatives may employ the same strategies for their personal investment accounts as the website and the application does for clients. However our policy requires all Access Persons to report all personal transactions in securities not otherwise exempt under the policy. All reportable transactions are reviewed for compliance with the Code of Ethics. In addition, FlexAdvisor's employees and representatives may have accounts at FlexInvest Securities. However, FlexAdvisor's policy requires that any employee or related person's account be treated in the same manner as any other unaffiliated account.

We do not, nor a related person recommend, to you, or buy or sell for your accounts, securities in which we (or a related person) have a material financial interest.

² Access person means any of your supervised persons who has access to nonpublic information regarding any clients' purchase or sale of securities, or nonpublic information regarding the portfolio holdings of any reportable fund, or who is involved in making securities recommendations to clients, or who has access to such recommendations that are nonpublic. If providing investment advice is your primary business, all of your directors, officers and partners are presumed to be access persons.

E. Personal Trading

From time to time, FlexAdvisor may recommend securities to clients that FlexAdvisor has purchased for its own accounts. However, FlexAdvisor has established restrictions in order to ensure its fiduciary responsibilities are met. Under our Code of Ethics, the decision to purchase securities for FlexAdvisor portfolios must never be substantially derived, in whole or in part, from the role of a supervised person, unless the information is also available to the investing public on reasonable inquiry. FlexAdvisor will never engage in trading that operates to the client's disadvantage. We do not execute transactions on a principal or agency cross basis.

The Ethics Rules are available to you and prospective clients upon request. In the event that you request a copy of our Code of Ethics, we will furnish to you a copy within a reasonable period of time at your current address of record.

F. Review of Accounts

Investment positions are monitored and accounts are reviewed periodically to verify adherence to investment guidelines. The asset allocation, tolerance for risk, the investment horizon, and the kind of investments that the account will have are established by the investment guidelines. Additional reviews may be triggered by changes in an account holder's personal, tax, or financial status. Clients are asked at least once a year if their financial situation has changed.

Market appreciation or depreciation may cause an account to be out of balance with the established guidelines. Other deviations from guidelines may be caused by deposits or withdrawals. Accounts that are out of balance due to deposits or withdrawals should be rebalanced before the next quarterly review. The investment guidelines may be changed by the client at any time. Clients will receive written account statements directly from the custodian.

G. Brokerage Practices

In recommending a custodian broker-dealer, we look for companies that offer relatively low transaction fees, access to desired securities, trading platforms, and support services. We use Apex as the qualified custodian for all client accounts based on our review of costs and capabilities.

Apex may provide benefits to FlexAdvisor such as software and other technology that include: a. access to client account data (such as trade confirmations and account statements); b. facilitate trade execution; c. pricing and other market data; d. facilitate payment of fees from its clients' accounts; and e. assist with back-office functions, recordkeeping and client reporting.

H. Best Execution

FlexAdvisor has an obligation to seek best execution for its clients. In seeking best execution, the determinative factor is not the lowest possible commission cost but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker dealer's services, including the value of research provided, execution capability, commission rates, reputation and responsiveness. Therefore, FlexAdvisor will seek competitive commission rates, but may not obtain the lowest possible commission rates for account transactions. However, since FlexAdvisor's clients do not pay transaction costs, this potential conflict is mitigated. "Best execution" includes the amount of broker-dealer fees, which will be charged to the FlexInvest Securities account in connection with any trade, but it may also include other benefits. As such, FlexAdvisor may retain Apex as the custodian with respect to the FlexInvest Securities account even if its broker-dealer fees are not the lowest fees chargeable for such transaction.

I. Trading

The client will direct and be responsible for the direction of investments through the website or the application by: (i) carefully reviewing the information about investing and the Investments available on the website or the application; (ii) carefully considering the recommendations generated; (iii) choosing or excluding the investments.

FlexAdvisor reserves the right, at any time and without notice, to determine and modify from time to time the investments offered through the online platform, to determine the exact time to trade securities based on buy and sell requests by clients, and to determine fractional shares in the Program.

J. Client Referrals and Other Compensation

FlexInvest has a referral program that consists of a monetary incentive to join and/or promote the opening of accounts at FlexInvest Securities. Under the program, the existing client will receive a monetary incentive for every referred client that opens a FlexInvest Securities account. The existing FlexInvest client can easily refer people by inviting them to join with a unique referral code that we can track to the client that issued the invite. Once the person that they referred opens an account and inputs their friends' referral code in the onboarding process, they both will receive a monetary incentive usually ranging between \$5 and \$20 USD. The incentive is deposited directly into their FlexInvest Securities account.

Example: Roger is an existing FlexInvest client that wants to invite his friends. He send out an invite with his unique referral code to his friends. His friend Rachel receives his invite via email or text, inviting her to open a FlexInvest Securities account. Once Rachel opens her account, then \$5 USD (or whatever the running promotion is that month) is deposited into

the clients' accounts within three business days.

K. Financial Information

We have no financial condition that is reasonably likely to impair our ability to meet contractual commitments to clients given that we do not have discretionary authority or custody of client funds or securities. In addition, we are not currently, nor at any time in the past ten years been the subject of a bankruptcy petition. FlexAdvisor does not solicit fees of more than \$1,200.00, per client, six months or more in advance and therefore does not need to include a balance sheet with this Brochure.