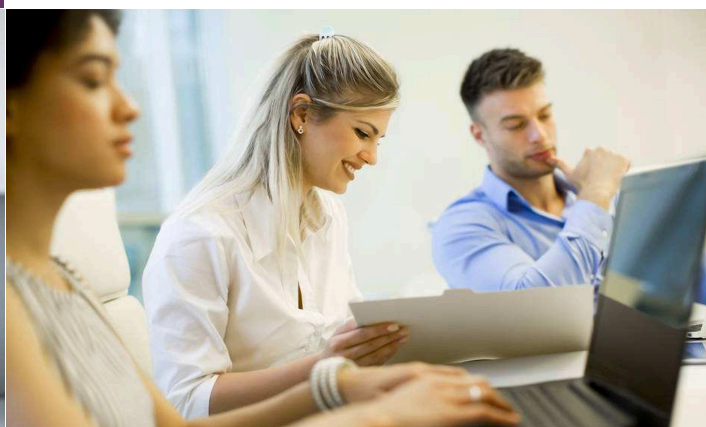
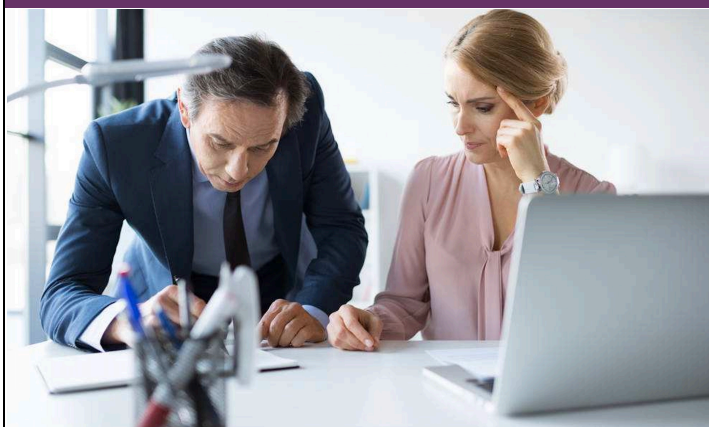
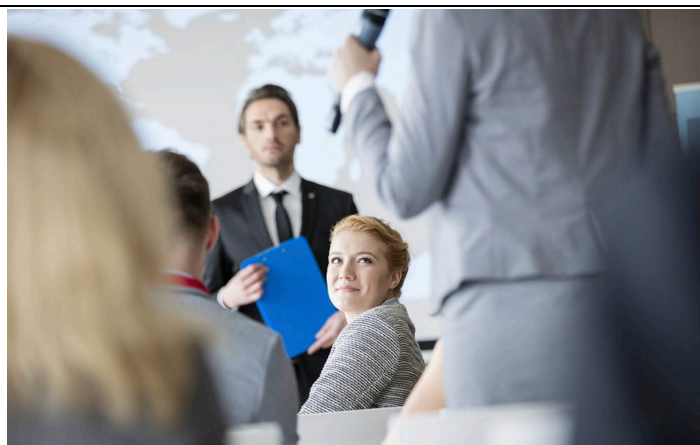


Palm Springs



Palm Springs Advisory LLC

Form ADV Part 2B- Individual Disclosure Brochure
for

Lei Zhang (Personal CRD No. 6875983)

This brochure supplement provides information about Lei Zhang that supplements the Palm Springs Advisory LLC brochure. You should have received a copy of that brochure. Please contact Lei Zhang if you did not receive Palm Springs Advisory LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about Lei Zhang also is available on the SEC's website at www.adviserinfo.sec.gov.

Version Date: September 18, 2019

202 Block 1, 15 Dong Zhi Men Wai Da Jie, Dongcheng District Beijing China
100027

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1. Educational Background and Business Experience

Name: Lei Zhang

Born: 1989

a. Educational Background

- Master of Marketing and Financial Services, University of Exeter, United Kingdom; July 2012
- Bachelor of Applied Finance, Macquarie University, Australia, July 2011

b. Designations:

Registered Investment Adviser Representative

To be eligible as Registered Investment Adviser Representative, individual required to pass the Series 65 – Uniform Investment Adviser Law Examination, except for several exemptions.

The Series 65 Examination contains the following four parts.

- Economic Factors and Business Information
- Investment Vehicle Characteristics
- Client Investment Recommendations and Strategies
- Law, Regulations, and Guidelines

c. Business Experience:

Time Interval	City	Employer	Security Related	Position
OCT 2017 to Sep 2019	Beijing	Panorama Capitals LLC	Yes	CCO
OCT 2015 to Present	Changsha	9Pyro IT LLC	No	CEO
JAN 2016 to Present	Changsha	San Chemical Trading	No	Head of Business Development
JUL 2012 to FEB 2016	Changsha	Wanqiang Telecommunication	No	General Manager

2. Disciplinary Information

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business.

3. Other Business Activities

Lei Zhang acts as Chief Executive Officer of gPYRO IT LLC, which their main business is to promote their Enterprise Resource Planning system and relative platform to manufacturing industry. gPyro is not a public company, and Palm Springs Advisory will not give any advice to clients purchasing any financial related product of gPyro to clients.

Lei Zhang also acts as Head of Business Development of San Chemical Trading LLC, which their main business is to trade chemical. San Chemical is not a public company, and Palm Springs Advisory will not give any advice to clients purchasing any financial related product of San Chemical to clients.

Palm Springs Advisory always acts in the best interest of the client, and clients are in no way required to utilize the services of any representative of Palm Springs Advisory in connection with such individual's activities outside of Palm Springs Advisory.

4. Additional Compensation

As CEO of gPyro IT LLC and head of business development of San Chemicals, Lei Zhang apportions his time between the two companies and Palm Springs Advisory. Lei Zhang's business activities represent a substantial amount (greater than 60%) of his time and compensation.

5. Supervision

Palm Springs Advisory has adopted supervisory policies and corresponding procedures to ensure that Palm Springs Advisory properly supervises its advisory personnel. Section 203(e) of the Investment Advisers Act of 1940, as amended (the "Advisers Act") states, in part, that the Securities and Exchange Commission (the "SEC") may prohibit investment advisers from engaging in investment advisory activities for a period not exceeding 12 months or, in egregious cases, revoke the registration of the investment adviser, for a failure to properly supervise its employees. The severity of the sanction is determined on a case-by-case basis. Past SEC enforcement actions have suggested that the adoption and implementation of reasonable compliance procedures is an affirmative defense against a claim of failure to supervise.

Palm Springs Advisory' supervisory policies establish procedures, and a system for applying the procedures, which Palm Springs Advisory reasonably expects to prevent and detect, insofar as practicable, any violation of any applicable law, rules and regulations, including the Advisers Act, and the rules and regulations promulgated thereunder, by a person subject to Palm Springs Advisory' supervision. Palm Springs Advisory' supervisory policy is predicated on the principle that Palm Springs Advisory and its employees owe a fiduciary duty to their clients. Each employee must avoid any activity or relationship that may reflect unfavorably on Palm Springs Advisory as a result of a possible conflict of interest, the appearance of such a conflict, the improper use of confidential information, or the appearance of any impropriety. With respect to supervision of the investment advice provided to clients, each client account is reviewed periodically by Lei Zhang.