



Align Investing, Inc

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Form ADV Part 2A

Client Brochure

February, 2019

This brochure (“Brochure”) provides information about the qualifications and business practices of Align Investing, Inc. (“Align”), a federally-registered investment adviser. Registration does not imply a certain level of skill or training but only indicates that Align has registered its business with state and federal regulatory authorities, including the United States Securities and Exchange Commission (SEC). We have applied for but have not yet received an SEC number. The information in this Brochure has not been approved or verified by the SEC or by any state securities authority.

If you have any questions about the contents of this Brochure, please contact us at 888 405-4405 or support@aligninvesting.com. Additional information about Align is also available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 Material Changes

This Brochure dated January, 2019, reflects the Adviser's Initial Form ADV filing for registration as a federal investment adviser with the SEC.

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Item 4 Advisory Business

General Description of the Firm

Align Investing, Inc (“Align”, “the Adviser”) is an online investment adviser that became registered with the Securities and Exchange Commission (“SEC”) in January 2019. The Adviser is a corporation organized under the laws of the state of Delaware in February 2018 under the original name of OpInvest, Inc. Align is owned 51% by Jeff Lesser and 34% by Jarod Stewart, the Adviser’s principals. Additional information about Align’s products, structure and directors is provided on Part 1A of Align’s Form ADV which is available online at <http://www.adviserinfo.sec.gov>. Our SEC Number is (TBD). We encourage Clients to visit our website <http://www.aligninvesting.com> for additional information.

Summary of Align’s Advisory Services

Align offers investment advice and portfolio optimization services to individuals through a secured mobile application. Align’s goal is to provide you with an Internet-based investment management service where you can receive investment advice for your portfolio holdings in one user-friendly website.

Align’s unique automated investment service is based on a number of different methods that makes it possible for anyone to access state-of-the-art portfolio management. Each Client’s individualized portfolio is selected based on the his/her investment objectives and risk tolerances. Using our technology, we can create an investment plan and manage a Client’s portfolio by seeking to identify:

- The optimal asset classes in which to invest;
- The most efficient product(s) to represent each of those asset classes;
- The ideal mix of asset classes based on the Client’s specific risk tolerance; and,
- The most appropriate time to rebalance the Client’s portfolio to maintain intended risk tolerance and optimal return for the Client’s risk level.

Align offers its customers two (soon to be three) different service options—

ALIGN FREE:

Align may create portfolios that are selected to be diversified and help people achieve a goal (i.e., retire, by a house, build long-term wealth). Diversified and transparent portfolios are recommended that align with the Client’s risk tolerance, risk capacity, time horizon, and values for investment without charge, i.e., we recommend the right fund(s) to investors taking into consideration the customer’s age, other investments, financial

situation and needs, tax status, investment objectives, investment experience, investment time horizon, liquidity needs, risk tolerance and values. Furthermore, Align recommends portfolios that are most likely to align with peoples' preferences. We score each asset and each portfolio and make transparent the level alignment. However, it is possible for Clients to select a portfolio that doesn't completely align with their preferences if they so choose.

ALIGN PREMIUM: In addition to the ability to invest in managed portfolios created by Align described above in the Align Free Option, investors have the ability to invest in a modified portfolio that is 100% aligned with their values and objectives.

These portfolios may use a number of different methods to determine impersonal changes to the portfolio assets and allocations. In addition, we will provide personalized advice to investors based on changes to the market or the portfolio, which cause a portfolio to no longer be suitable or if a more suitable portfolio is a good option to present to the investor.

Portfolio Management Services

Align offers software-based financial advisor services based on the financial objectives, life events, age, time horizon, and risk tolerance of each client. Through our website, each client enters data and creates a financial goal, which outlines the client's contributions, timeline and the proposed investment strategy managed by Align. Once the financial goal is confirmed and proposed investment strategy selected, Align automatically implements the investment strategy and periodically rebalances each client's portfolio in order to maintain an efficient portfolio in accordance to the financial goal. Each client needs to update their financial goal if their objective, risk tolerance, or life events change. Align will check annually with each client to confirm their data remains valid.

Client Tailored Services and Investment Restrictions

Align provides all analysis services through proprietary, automated computer algorithms on our website (<http://www.aligninvesting.com>) that use explicit and implicit mechanisms within the product to understand the investors' preferences in order to tailor advisory services. This automated service provides analyses and recommendations based on the financial and other information provided by the client to make a suitable recommendation. Clients receive ongoing supervisory services for their accounts. Investment recommendations may include, but may not be limited to, recommendations to buy, sell, hold or otherwise gain exposure to a variety of securities.

Align's software-based financial advisory service is tailored to match the individual needs of each Client, with products that have certain features designed to meet the Client's investment objectives, timeline, goals and risk tolerance level.

Our services are offered on a discretionary basis only. Clients authorize Align to place trades

on their behalf using the recommendations generated through our proprietary algorithms based on the personal and financial information provided by the client. It will remain the Client's responsibility to promptly notify Align if there is any change in his/her financial situation and/or investment objectives for the purpose of our reviewing, evaluating or revising previous account restrictions or firm investment recommendations.

Account Restrictions

Clients may specify that they do not want to invest in particular securities or types of securities and we will endeavor to ensure their portfolios match their preference(s). If the portfolio changes such that it no longer aligns with the Client's restriction preference(s), we will alert them and attempt to recommend a new option that does. Clients are also reminded that restricting investments to particular asset or asset class may minimize diversification and potentially increase portfolio volatility, and in some cases may make it impractical to serve the account under an investment management services engagement.

Client accounts must be held at DriveWealth, LLC ("DriveWealth"), a SEC registered broker-dealer that will clear and settle Client transactions and custody Client assets at Electronic Transactions Clearing, Inc. ("ETC"), a "qualified custodian", This will allow Align to place trades on behalf of our clients. For clients whose accounts are not currently held at DriveWealth, Align will assist clients in establishing an account with DriveWealth and transferring assets into the new account. Please see Item 12 for a further discussion of Align's brokerage practices.

Wrap Fee Program

Align does not participate in, sponsor or serve as a portfolio manager in any investment program involving wrap fees. However, if DriveWealth, participates in wrap fee programs (yet to be determined), we may recommend these to our Clients.

Align Investing in its sole discretion may from time to time offer Information about wrap fee programs that will be found in Align's "Wrap Fee Brochure".

Assets Under Management

As a newly registered adviser, as of January 2018, Align does not yet have any accounts or assets under management.

Item 5 - Advisory Fees

Management Fees

Align will charge no advisory fees for its Align Free and Align Premium Accounts.

Other Fees

Align is a “fee only” investment advisor, although for its free services currently offered, neither the firm nor its employees receive or accept any direct or indirect compensation related to investments that are purchased or sold for Client Accounts. However, unaffiliated third parties may impose certain charges. These charges may include, but are not limited to, custodial fees, wire transfer and electronic fund fees, paper statement fees, etc. charged by DriveWealth. Clients also pay their own taxes on gains and income in connection with the account and its activities. DriveWealth generally does not charge you separately for custody services.

Negotiability of Fees

Align’s Program Fee is not negotiable by individual clients.

Account Termination

If a Client wishes to terminate an existing relationship with Align, he or she can do so at any time by emailing support@aligninvesting.com. The termination will take effect promptly upon our receipt of the notification from the Client. Align may terminate a Client’s access to our online service if we believe a Client is in breach of Align’s Terms of Use and the Investment Management Agreement

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

Align does not charge performance-based fees. Our advisory fees are only charged as disclosed above in Item 5.

Item 7 Types Of Clients

Align offers its investment advisory services to individuals. There is no account minimum required.

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

Methods of Analysis and Investment Strategies

Align uses a variety of portfolio strategies to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, by carefully choosing the proportions of various assets. Portfolio managers who create and manage their portfolios on Align use a diverse set of strategies. Align Investing uses filtering and algorithmic mechanisms to help you find portfolios whose strategies most closely align with your preferences. Factors that are taken into consideration include: age, location, income, other investments, risk tolerance, investing term, investing objective, values, and more. Based on a proposed financial goal and the client's risk tolerance, Align seeks to create an individualized investment plan using the optimal asset classes in which to invest. We continuously monitor our Client's portfolios and periodically rebalance them back to the client's target mix in an effort to optimize returns for the intended level of risk.

Risk of Loss

Materials Risks Involved (particular to the Align's investment strategies)

1. Volatility and Correlation Risk – Clients should be aware that Align'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.

2. 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.

General Investment Risks

Align 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 Align'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.

1. Market Risk. Even a long-term investment approach cannot guarantee a profit. Economic, political, and issuer-specific events will cause the value of securities, and the portfolio that owns them, to rise or fall. Because the value of an investment in a portfolio will fluctuate, there is the risk of loss of money.

2. Small Company Risk. Securities of small companies are often less liquid than those of large companies and this could make it difficult to sell a small company security at a desired time or price. As a result, small company stocks may fluctuate relatively more in price. In general, smaller capitalization companies are also more vulnerable than larger companies to adverse business or economic developments and they may have more limited resources.

3. Value Investment Risk. Value stocks may perform differently from the market as a whole and following a value-oriented investment strategy may cause a portfolio to at times underperform equity funds that use other investment strategies.

4. Risks of Concentrating in One Sector. Portfolios that concentrate in one particular sector of the market are more susceptible to adverse developments affecting a single project or market segment than more broadly diversified investments. The performance of the portfolio may be materially different from the broad equity market.

5. Credit Risk. Companies in which the Fund invests could deteriorate as a result of, among other factors, an adverse development in their business, a change in the competitive environment or an economic downturn. As a result, companies that the Fund expected to be stable may operate, or expect to operate, at a loss or have significant variations in operating results, may require substantial additional capital to support their operations or maintain their competitive position, or may otherwise have a weak financial condition or be experiencing financial distress.

6. Liquidity Risk. Liquidity risk exists when particular portfolio investments are difficult to purchase or sell. To the extent that the Portfolio holds illiquid investments, the portfolio's performance may be reduced due to an inability to sell the investments at opportune prices or times. Liquid portfolio investments may become illiquid or less liquid after purchase by the portfolio due to low trading volume, adverse investor perceptions and/or other market developments. Liquidity risk includes the risk that the portfolio will experience significant net redemptions at a time when it cannot find willing buyers for its portfolio securities or can only sell its portfolio securities at a material loss. Liquidity risk can be more pronounced in periods of market turmoil.

Item 9 -Disciplinary Information

Like all registered investment advisors, Align is obligated to disclose any disciplinary event that might be material to any Client when evaluating our services. 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.

Item 10 Other Financial Industry Activities and Affiliations

In providing advisory services to Clients, Align may share the same personnel or services also used by one or more of its affiliates. Align has entered into a relationship with DriveWealth, LLC as its broker dealer to clear and settle transactions on behalf of our Clients. DriveWealth is a broker/dealer registered with the Financial Industry Regulatory Authority (FINRA) and the U.S. Securities & Exchange Commission (SEC). Securities are maintained in digital form at DTCC in the U.S. by Electronic Transactions Clearing, Inc. ("ETC"), the custodian of record for the securities held by customers.

Any customer cash that is kept at DriveWealth is segregated into a special reserve account for the exclusive benefit of the end clients. Customer free cash is swept, on a nightly basis, into a Dreyfus Money Market Account. Dreyfus one of the largest US investment management firms. Sweeping the free cash into a Federated money market account securitizes the cash and makes it eligible for SIPC protection.

SIPC provides protection on customer accounts. DriveWealth is a member of SIPC (www.sipc.org), which protects securities customers of its members up to \$500,000 (including up to \$250,000 for claims for cash).

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

The Adviser has adopted a Code of Ethics (the “Code”) under Rule 17j-1 of the Investment Company Act and Rule 204A-1 of the Investment Advisers Act for certain access persons (“Access Persons”) of the Adviser.

The Code identifies a number of basic principles that guide our business practices and set minimum standards of business conduct. These are the ethical principles on which the Code has been based:

- We must always conduct our business with the highest level of honesty, professionalism and ethical conduct. This high standard must be followed in dealing with employees, business partners, outside agencies, regulatory bodies and clients. Further, we must follow this standard in our handling of actual or apparent conflicts of interest between personal and professional relationships.
- We must strive for full, fair, accurate, timely and understandable disclosure in reports and documents that we file with, or submit to, the Securities and Exchange Commission (“SEC”), the Financial Industry Regulatory Authority (“FINRA”), and other regulatory bodies as well as in our public communications made by the Adviser.
- We must fully comply with applicable laws, governmental rules and regulations.
- We must make every effort to continuously improve and uphold our good reputation with customers and business partners and seek to ensure that investors in our funds are treated fairly and appropriately with every interaction.
- Our entire team must constantly seek to encourage an environment of mutual respect, openness and integrity in the workplace. Further, we encourage every member of the team, at all levels in the organization to foster a spirit of teamwork, entrepreneurial energy and enthusiastic client focused activities that resonate to all involved our commitment to excellence and our higher ethical standard.
- The employees of Align and its affiliates have committed to a Code of Ethics that is available for review by clients and prospective clients upon request. The firm will provide a copy of the Code of Ethics to any client or prospective client upon request.

The Code is designed to ensure that Access Persons act in the interest of its Clients with respect to any personal trading of securities. The Code contains (i) certain reporting requirements applying to purchases of ETF’s or the purchase of underlying portfolio securities and (ii) securities trading clearance procedures applying to the purchase of portfolio securities. The Code also requires all Access Persons to pre-clear with a compliance officer all trades in stocks, bonds, initial public offerings, and private investments. Subject to the terms of the Code, employees of Align may purchase for their own accounts securities recommended for purchase by Clients.

Participation or Interest in Client Transactions

Align may recommend the purchase or sale of securities in which it has a financial interest. However, without the approval of the Chief Compliance Officer (“CCO”), Align shall not invest in, acquire investments from, or sell investments to any Clients that holds an investment of more than 5% of the outstanding equity of such entity or is in a position of control.

Furthermore, Align has adopted policies and procedures to avoid potential conflicts of interest to the detriment of Clients or portfolios:

- Align’s CCO will monitor the personal securities transactions of the Advisor’s associates to ensure that such persons are fulfilling their fiduciary responsibilities to Clients.
- In addition to monitoring securities transactions, the CCO will take all reasonable steps to determine that all associates of the Adviser comply with certain restrictions regarding a) Pre- clearance of Securities Transactions; b) Black-Out Periods; c) Short Term Trading; d) Active Trading by Advisory Representatives for their own Accounts; and, e) filing Quarterly Personal Securities Trading Reports:
- Align and its employees may buy or sell securities that are also held by the Clients.
- Employees must comply with the provisions of the Align’s *Compliance Manual*.

Personal Trading

The Chief Compliance Officer of the Adviser is responsible for reviewing all employee trades each quarter. The personal trading reviews ensure that the personal trading of employees does not affect the markets and that Clients are not compromised.

Item 12 Brokerage Practices

Directed Brokerage

Brokerage accounts, agreements, and order processing will be conducted through DriveWealth, LLC (“DriveWealth”), an SEC registered broker-dealer that provides brokerage related services to Align Investing and clients within the Align Program. Using DriveWealth’s application program interface (“API”), the Align App allows Clients to create an investment account instantly on any mobile device. All account opening functionalities, including identity verification and approval, are handled digitally and instantly by DriveWealth. Electronic Transaction Clearing, Inc, an SEC registered broker- dealer, will provide custody, clearing, and settlement services for DriveWealth, and thereby, for Align Investing’s Clients.

We are independently owned and operated and are not affiliated with DriveWealth. DriveWealth will hold your assets in a brokerage account and buy and sell securities when we and/or you instruct them to do so. Since we require that you use DriveWealth as custodian/broker in order to use Align's services, you will need to open an account with DriveWealth by entering into an account agreement directly with them. While we do not open the account for you, we may assist you in doing so. If you do not wish to place your assets with DriveWealth, then we cannot manage your account.

How We Select Brokers/Custodians

In determining a custodian/broker to hold Client assets and execute transactions, Align based its decision to use DriveWealth, LLC as our clearing Broker Dealer and ETC as the Custodian on our evaluation of its services to be most advantageous overall when compared with other available providers and their services. We considered a wide range of factors, including:

1. Capability to execute, clear, and settle trades (buy and sell securities for your account) itself or to facilitate such services.
2. Capability to facilitate timely transfers and payments to and from accounts.
3. Availability of investment research and tools that assist us in making investment decisions.
4. Quality of services.
5. Competitiveness of the price of those services and willingness to negotiate the prices.
6. Reputation, financial strength, and stability.
7. Prior service to us and our other clients.

Best Execution

Our Clients are required to appoint DriveWealth, LLC as their broker dealer and ETC as the custodian, respectively. For our clients' accounts, DriveWealth generally does not charge you separately for custody services. We have determined that having DriveWealth execute trades is consistent with our duty to seek "best execution" of your trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above (see "How we select brokers/custodians").

DriveWealth's execution procedures are designed to make every attempt to obtain the best execution possible, although there can be no assurance that it can be obtained. Clients should consider whether or not the appointment of DriveWealth as the sole broker may or may not result in certain costs or disadvantages to the client as a possible result of less favorable executions.

Generally, when clients make changes to their accounts during normal stock market hours transactions will be processed momentarily while changes clients make to their accounts when markets are closed will be processed the next business day. Transactions are sometimes subject to processing delays that can cause significant time lapses between the time clients have initiated a change to an account and execution. In particular, processing delays may mean that account changes initiated less than thirty minutes before markets close may not transact until the next business day. Markets generally close at 4:00 PM ET. Further, deposits are automatically subject to a processing period that may be up to five business days or longer; deposit related transactions will not occur until the next business day after this processing period is complete.

Soft Dollars

DriveWealth serves as the broker dealer for Align's Clients and makes available various support services to Align which may not be available to DriveWealth's retail customers. Some of those services help us manage or administer our clients' accounts, while others help us manage and grow our business. These support services are generally available on an unsolicited basis (we don't have to request them) and at no charge to us.

Services That Benefit You. DriveWealth includes access to a range of investment products, execution of securities transactions, and custody of client assets through DriveWealth. DriveWealth's services described in this section generally benefit you and your account.

Services That May Not Directly Benefit You. DriveWealth also makes available to us other products and services that benefit us, but may not directly benefit you or your account. These products and services assist us in managing and administering our clients' accounts, such as software and technology that may:

1. Assist with back-office functions, recordkeeping, and client reporting of our clients' accounts.
2. Provide access to client account data (such as duplicate trade confirmations and account statements).
3. Provide pricing and other market data.
4. Assist with back-office functions, recordkeeping, and client reporting.

Services That Generally Benefit Only Us. By using DriveWealth, we will be offered other services intended to help us manage and further develop our business enterprise. These services include:

1. Educational conferences and events.

2. Consulting on technology, compliance, legal, and business needs.
3. Publications and conferences on practice management and business succession.

Our Interest In DriveWealth's Services

The availability of these services from DriveWealth benefits us because we do not have to produce or purchase them. In addition, we don't have to pay for DriveWealth's services. These services may be contingent upon us committing a certain amount of business to DriveWealth in assets in custody. We may have an incentive to recommend that you maintain your account with DriveWealth, based on our interest in receiving DriveWealth's services that benefit our business rather than based on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a conflict of interest. We believe, however, that our selection of DriveWealth as custodian and broker is in the best interests of our clients. Our selection is primarily supported by the scope, quality, and price of DriveWealth's services (see "How we select brokers/custodians") and not DriveWealth's services that benefit only us.

Order Aggregation

When Align Investing considers it to be in the Client's best interest and to treat all customers fairly and improve price quality, we may, but are not required to, aggregate orders for the sale or purchase of securities with orders for other clients of the Program. Under this approach, DriveWealth may

effect aggregated block transactions involving multiple DriveWealth Accounts. These transactions are not subject to any markups, markdowns, or dealer spreads. In conducting these transactions no client is favored over any other client and each client that participates in an aggregated transaction will participate at the average share price for transactions in the aggregated order.

There are never any separate fees for any trade execution or custody service.

Allocations

The nature of the Adviser's business is such that it will not be allocating shares to investors.

Cross-Transactions

At this time, the Adviser does not anticipate that it would cause a Client to sell a security and another of its advisory clients to purchase the same security at or about the same time.

Item 13 - Review of Accounts

Align's software automatically reviews client accounts for alignment. As preferences are

updated or portfolios are changed we review the client's' investments to ensure they are alerted to alignment issues and are provided alternative options. The Align App provides all Clients with continuous on-demand access to real-time reporting information about their portfolios. e.g., Account status, securities positions and balances. Clients may also receive periodic e-mail communications describing portfolio performance, Account information, and product features and reminders to update their investment profile.

Align reviews each Client's Account when it is opened, and continuously monitors and periodically rebalances each Client's portfolio to seek to maintain a Client's targeted risk tolerance and optimal return for the Client's risk level. Align also conducts reviews when material changes may have occurred to a Client's portfolio or investment objectives. We consider tax implications and the volatility associated with each of our chosen asset classes when deciding when and how to rebalance.

On a annual basis, Align contacts each Client to remind them to review and update the profile information they previously provided. Align also requests that Clients reconfirm the same information on an annual basis. These notifications and confirmations include a link to the Client's current information and contact information for the Align support team. Currently, the Align team members whose tasks include supervising, arranging and responding to these notifications, confirmations and reviews are: the Chief Compliance Officer with help from DriveWealth's Client Services.

Align conducts separate reviews related to the ETFs used for Client portfolios. These reviews are approved by Align's CCO which has the authority, if necessary, to take action up to and including the removal, addition or replacement of an ETF strategy, from the portfolios used by Align.

Item 14 - Client Referrals and Other Compensation

We receive a non-economic benefit from DriveWealth in the form of the support products and services it makes available to us and other independent investment advisors whose clients maintain their accounts at DriveWealth. These products and services, how they benefit us, and the related conflicts of interest are described above (see Item 12—Brokerage Practices). The availability to us of DriveWealth's products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

Incoming Referrals

Align may receive client referrals from other sources including from current clients, attorneys, accountants, employees, personal friends of employees and other similar sources. The firm does

not engage solicitors to solicit business on its behalf or compensate referring parties for referrals.

Referrals Out

The Adviser does not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

Other Compensation

The Adviser does not receive any other form of compensation other than what has already been discussed previously in *Item 5 - Fees and Expenses* and in *Item 12 – Brokerage Practices – Directed Brokerage* of this document.

Item 15 Custody

Align Investing does not maintain custody of your assets that we manage. Your assets are maintained at DriveWealth's "qualified custodian," AFC". . Under your IMA with Align, you have authorized us to instruct the custodian to deduct our Investing's advisory fees directly from your account, which is considered a form of "custody." For this reason, we are deemed to have "custody" of your assets for this limited purpose although the custodian maintains actual custody of client assets. You will receive account statements from the custodian at least quarterly, which will reflect the withdrawal of any fees. All clients are advised to review their account statements promptly to confirm the accuracy of the information contained. Should discrepancies or errors be found, clients should contact Align Investing or the custodian directly.

You should carefully review those statements promptly and verify that your advisory fees have been calculated properly.

Item 16 Investment Discretion

Align has full discretionary authority to determine—

- which securities as well as the amount of securities that will be bought and sold in clients' accounts;
- the broker/dealer to be used to purchase or sell securities for Client accounts (DriveWealth, LLC);
- the selection of other advisors; and,
- the amount of compensation to be paid to DriveWealth for custody and brokerage services.

Item 17 Voting Client Securities

Align Investing exercises voting authority over Client proxies pursuant to its proxy voting policies and procedures in accordance with Rule 206(4)-6 of the Investment Advisers Act of 1940, as amended. The policies require Align Investing to vote proxies received in a manner consistent with the overall best interests of the Clients and to seek to avoid material conflicts of interests.

Item 18 Financial Information

As an advisory firm, Align is required to disclose any financial condition that is reasonably likely to impair our ability to meet our contractual obligations. Align does not have any financial impairment that will preclude the firm from meeting contractual commitments to clients.

Since Align does not collect any advisory fees in advance, a balance sheet is not required to be provided.

Item 19 - Requirements for State Registered Advisers

Align Investing, Inc is a federally-registered investment adviser with the SEC.