



Threadvest

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This brochure provides information about the qualification and business practices of Threadvest, LLC. If you have any questions about the contents of this brochure, please contact us at 347-552-3231, or by email at marko@threadvest.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission, or by any state securities authority.

Additional information about Threadvest, LLC is available on the SEC's website at www.adviserinfo.sec.gov.

February 27, 2019

Material Changes

There are no material changes to report as of February 27, 2019.

Table of Contents

Material Changes	2
Item 4: Advisory Business.....	4
Firm Description	4
Principal Owners	4
Types of Advisory Services	4
Tailored Relationships	4
Assets Under Management	4
Item 5: Fees and Compensation.....	4
Description	4
Other Fees	5
Item 6: Performance-Based Fees & Side-by-Side Management.....	5
Item 7: Types of Clients.....	5
Item 8: Methods of Analysis, Investment Strategies and Risk of Loss	5
Methods of Analysis.....	5
Investment Strategies.....	5
Risk of Loss.....	6
Item 9: Disciplinary Information.....	6
Item 10: Other Financial Industry Activities and Affiliations.....	6
Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading ...	6
Code of Ethics.....	6
Investing in Same Securities Recommended to Users	7
Personal Trading Policies	7
Item 12: Brokerage Practices	7
Selecting Brokerage Firms	7
Item 13: Review of Accounts	7
Item 14: Client Referrals and Other Compensation.....	7
Item 15: Custody	8
Item 16: Investment Discretion.....	8
Item 17: Voting Client Securities.....	8
Item 18: Financial Information	8

Item 4: Advisory Business

Firm Description

Launched in October 2018, Threadvest, LLC (“Threadvest” or “Firm”) is an interactive website, providing advice specifically on Exchange Traded Funds (“ETFs”) and third-party automated robo-adviser platforms (“Robo-Adviser”).

Principal Owners

The principal owners of Threadvest are Michael LoBosco and Marko Dedovic.

Types of Advisory Services

Threadvest’s website utilizes the ETF Miner (“Miner”), which provides research functionality targeting ETFs. It starts with a questionnaire to be completed by the user.

1. A user will start by selecting an area of interest, such as China, Healthcare, Robotics, etc.
2. The second step requires the user to rank their investment priorities using specific factors.
3. The final step is for the user to select the purpose of their investment.

Once the user has completed the three steps above, the Miner will generally recommend three ETFs for investment. Depending on the user’s responses, the Miner could generate a recommendation with only one or two ETFs. This could occur when the user’s responses are specific.

If the user decides to invest in the recommended ETFs, they can use Trade.it, which has a connectivity functionality, or one of the recommended Robo-Advisers, referred to as “All-Star Platforms” on the Firm’s website.

All data regarding the ETFs recommended by the Miner and used in the proprietary aspect of the Miner is received from Intrinio, a third-party financial data platform.

Tailored Relationships

The Firm does not have personal relationships with the users. The user has the discretion whether or not to invest in the ETFs recommended by the Miner or to trade on their own with Trade.It or with one of the recommended Robo-Advisers.

Assets Under Management

As of December 31, 2018, Threadvest has \$0 assets under management.

Item 5: Fees and Compensation

Description

Users do not pay Threadvest a fee for utilizing the Miner or its website.

The only fee currently paid to Threadvest will be paid via a fee from the Robo-Advisers recommended by the Firm, should the user utilize that Robo-Advisers’ services.

Other Fees

Users should be mindful that investing in ETFs will bear additional costs. ETFs have their own fees, such as management expense ratios and sales charges. In addition, the user may be charged fees from broker dealers selected by the user, such as brokerage commissions and other custodial fees. Please refer to Item 12, Brokerage Practices, of this brochure on how Threadvest determined which Robo-Advisors to recommend.

Item 6: Performance-Based Fees & Side-by-Side Management

Threadvest does not receive any performance-based fees.

Item 7: Types of Clients

Threadvest does not have any clients. Any advice provided is through the Miner. No user will be under the direct supervision or management of the Firm.

There is no minimum for the user to invest in one of the recommended ETFs.

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

Methods of Analysis

Threadvest's website and Miner were built on the premise that passive investing over time reduces costs in the long term for the investor. Passive investing involves following the market indexes, with the expectation that over time the investments, or ETFs will perform similarly, or in line with, their index.

The Miner attempts to remove the complexity in selecting investments by narrowing down the process to three general categories of questions for the user (as discussed in Item 4, Advisory Business). A proprietary function of the Miner, not visible to the user, includes a complex analysis of certain financial characteristics of ETFs. The combination of these two elements generates the results and recommendations provided by the Miner.

Investment Strategies

Threadvest only recommends ETFs. ETFs are investments that consist of a large number of stocks selected using a set of predetermined investing rules and trade like stocks on an exchange. ETFs are often considered less risky than other asset classes because they allow for broad diversification of stocks and bonds at a fraction of the cost. The goal of the Miner is to evaluate the risk and rewards of available ETFs using a proprietary set of criteria to recommend the best possible choices.

Risk of Loss

Regardless of the type of investment, there is always a risk of loss that the user must be prepared to bear when investing in financial markets.

In addition, although ETFs are often considered less risky than other asset classes, ETF investing does still pose risks. Users should be aware of the following risks when investing in ETFs:

1. Market Risk – if the market declines the ETF will most likely decline. The extent to which an ETF declines depends upon the weight of securities held by the ETF and an ETF could decline more than the market depending on the underlying holdings of the certain ETF.
2. Trading Risk – this refers to the overall cost of owning the ETF. ETFs can be cheaper when compared to other assets classes but still include costs such as commissions, sales charges, and management expense ratio, among other things.

Item 9: Disciplinary Information

Neither Threadvest nor any supervised person of Threadvest has been subject to any disciplinary events.

Item 10: Other Financial Industry Activities and Affiliations

Neither Threadvest nor any supervised person of Threadvest has any reportable financial affiliations or activities outside of Threadvest.

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

Code of Ethics

Threadvest has adopted a written Code of Ethics (“Code”) that defines the Firm’s fiduciary commitment. The Code applies to all supervised persons of Threadvest. The Code covers a range of topics, including, but not limited to:

- Ethical standards,
- Reporting of personal securities trading,

- Pre-clearance requirements for supervised persons,
- Reporting of violations, and
- Review and enforcement processes.

A copy of Threadvest's Code of Ethics is available upon request, by contacting the number or email located on the cover page of this brochure.

Investing in Same Securities Recommended to Users

Supervised persons of Threadvest invest in the ETFs recommended through the Miner with the Robo-Advisers recommended on the Firm's website. Threadvest is investing in the same space recommended to users to be able to provide insight that the user may use when making their own investment decisions. Threadvest does not trade for Users which therefore mitigates conflicts such as front-running.

Personal Trading Policies

As mentioned above, all supervised persons of Threadvest will report personal securities trading in reportable securities. The reports will be reviewed to ensure adherence to the Firm's policies and regulations.

Item 12: Brokerage Practices

Selecting Brokerage Firms

Threadvest does not trade for users nor have discretion on the brokerage firms used by the users. The Firm's website does recommend Robo-Advisers to the user for their investments. Threadvest money will be invested with the Robo-Advisers to monitor and report to the user's about Threadvest's experiences. In recommending particular Robo-Advisers to users, the main factors Threadvest considered were the level of fees, the amount of relevant education and the quality of the Phone App.

Item 13: Review of Accounts

Threadvest does not review the accounts of the users nor provide reporting.

Item 14: Client Referrals and Other Compensation

Threadvest does receive a fee from some of the Robo-Advisers recommended on the Firm's website. This fee is not paid by the user, rather it is paid by the Robo-Adviser and is dependent upon the user signing up with that particular Robo-Adviser.

Item 15: Custody

Threadvest does not have any clients, therefore, Threadvest does not have custody of client assets.

Item 16: Investment Discretion

Threadvest does not have any clients, therefore, Threadvest does not have discretionary authority over any client accounts.

Item 17: Voting Client Securities

Threadvest does not have any clients, therefore, Threadvest does not vote proxies for clients.

Item 18: Financial Information

Threadvest does not have any reportable financial information.