

## **Part 2A of Form ADV: Firm Brochure**

### **Item 1: Cover Page**

**Note:** This brochure is prepared in accordance with the rules and regulations of the SEC and provides information about the qualifications and business practices of Nuts2Invest.com, LLC. If you have any questions about the contents of this brochure, please contact us at [compliance@Nuts2Invest.com](mailto:compliance@Nuts2Invest.com). The information in this brochure has not been verified or approved by the United States Securities and Exchange Commission or by any state securities authority. Additional information about Nuts2Invest.com, LLC is available at the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

### **Nuts2Invest.com, LLC**

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Website: [www.Nuts2Invest.com](http://www.Nuts2Invest.com)

Contact: For any queries or information related to this brochure, please contact us at [compliance@Nuts2Invest.com](mailto:compliance@Nuts2Invest.com), LLC

Date: February 7, 2019

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## **Item 2: Material Changes**

We are required to advise you of any material changes to our Firm Brochure (“Brochure”) from our last annual update, identify those changes on the cover page of our Brochure or on the page immediately following the cover page, or in a separate communication accompanying our Brochure. Please note that we do not have to provide this information to a client or prospective client who has not received a previous version of our brochure.

In 2019, we plan to provide subscription based on line investment tools to individual investors. Item 5 in the following is updated from our 2015 brochure to reflect this change.

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## Item 4: Advisory Business

A. Nuts2Invest.com, LLC. (“Nuts2Invest”) is a privately owned Ohio business founded in the state of Delaware in 2012. Our mission is to provide personalized online services of investing tools to individual investors who need independent, actionable investment information regardless of their level of sophistication or the size of their portfolios. The information provided in this site is not a financial advice, but it is general information on investment issues commonly encountered. Nuts2Invest is neither a Broker-Dealer nor a Financial Advisor firm and is not a substitute for an Investment Advisor an investor can hire for fees to get specific advice considering their specific circumstances. Nuts2Invest cannot provide financial advice and can only provide self-help services related to investment at your specific directions. Communications between you and Nuts2Invest are protected by our Privacy Policy.

Nuts2Invest utilizes proprietary technology incorporating an innovative patent-pending investment security sorting and ranking rules. Our ranking rules allow us to make customized investment portfolios based on an investor’s risk-taking appetite or their risk tolerance, including investment horizon, and other key factors related to investment. Nuts2Invest provides information about financial securities to the investor/user and gives them tools to build financial portfolio of securities. Nuts2Invest is available on-line and is free of charge to the investor/user.

Nuts2Invest allows the investor to:

- a) Choose risk appetite (willingness and ability to take risk),
- b) Rank investments in consideration with both return and risk,
- c) Implement an appropriate asset allocation strategy to match their risk appetite and optimize returns in consideration of their risk appetite;
- d) Rebalance their portfolios on a predetermined time basis.

The above services (the “services”) are made available through Nuts2Invest’s website:

<http://www.Nuts2Invest.com> (“the website”). The Company’s principal owner is Sunil Kulkarni, a US citizen who operates as a CEO of the business.

B. Nuts2Invest offers the following primary services after user/investor selects willingness to take risk or type of investor he/she is (conservative, moderate, aggressive or advanced when it comes to risk):

### **(i) Direct Contribution Plans (401k, 403b, 457b..)**

Investors are able to either select company name where they work/had worked and select their 401k plan or enter financial security symbol if the company information is not available. Nuts2Invest website displays historical performance and qualitative ranking for each security as well as portfolio proportion possibilities based on the risk taking willingness. The historical performance for portfolio is compared to market performance for the same time period.

### **(ii) IRA/Roth IRA**

Nuts2Invest ranks over 26,000 available mutual funds for the US investors in consideration with return and risk and then comes up with portfolios of security proportion in consideration with return, risk taken, and qualitative ranking. Different portfolio weights are provided in consideration with investor’s willingness to take risk.

### **(iii) Mutual Funds/Exchanged Traded Funds (ETFs)/Company Stocks**

Nuts2Invest provides a list of financial securities with proven performance in consideration with risk taken. A list is made available by financial industry sector/category for each type of financial security (mutual funds, ETFs, and company stocks).

### **(iv) Portfolio tracking and Rebalancing**

Investors are given new details (performance, portfolio weights..) on their investment portfolio on a regular time interval which is selected by them (monthly, every 3 months,..)

C. Nuts2Invest's services are based on specific directions from its clients. Nuts2Invest increases exposure to stock or stock based funds and reduce exposure to bonds or bond funds if investor is willing to take risk is higher and vice versa.

Nuts2Invest utilizes its own proprietary methodology in sorting and ranking financial securities. The analyses generated by Nuts2Invest's methodology are based on an assessment of willingness to take risk, financial securities' returns and volatility, and other key factors.

D. Nuts2Invest does not participate in any wrap fee programs.

E. Nuts2Invest does not manage client assets and does not have custody over the assets of any user, nor does it exercise discretionary authority over any user's account. Nuts2Invest does not execute trades for users. A user must make an independent determination of whether to follow any recommendation made by the website, and must make its own arrangements for execution of any desired trades.

## **Item 5: Fees and Compensation**

A. Access to the website is provided to users free of charge. Subscription fees will be charged the investors/users to use portfolio building tools. In addition Nuts2Invest intends to derive revenue from affiliate programs and advertisements by third parties utilizing banners and posters of various sizes and configurations that appear as advertisements on the website. These programs will in no way impact Nuts2Invest's independence and the unbiased nature of its portfolio recommendations.

B. Nuts2Invest does not hold assets for the users and therefore no fees are deducted from our users' assets.

C. In addition to Nuts2Invest's subscription fees to use portfolio investment tools clients may incur certain other costs and fees billed by third parties. These relate to brokerage costs charged by their brokers for the execution of trades, and in some circumstances custodian fees. Nuts2Invest does not execute trades for users, and users must therefore make their own arrangements for execution of any desired trades at their own cost.

D. Annual subscription fees are payable to Nuts2Invest in advance by clients.

E. Neither Nuts2Invest nor any of its representatives accept compensation for the sale of securities or other investment products. Search results, rankings and comparisons are fully comprehensive and entirely objective, and are not based on any arrangement or relationship that Nuts2Invest may have with any service or product provider. Sponsored listings are not entertained.

**Item 6: Performance-based Fees**

Neither Nuts2Invest nor any of its representatives charge any performance-based fees.

## **Item 7: Types of Clients**

Nuts2Invest's services provide tools for individual investors who are looking for non-biased, objective information about financial securities to help them make better investment decisions. These services are made available for annual subscription fees on the internet. We anticipate that our clients will comprise a broad range of individual investors, ranging from newcomers to experienced investors. Our analysis reports are accessible only after registering an account on our website. We do save the user's e-mail address and password for future visits to our website. As mentioned in Item 5, registering an account on Nuts2Invest and utilizing our services is provided with annual subscription fees. In order to register an account on Nuts2Invest, a user is required to provide Nuts2Invest with the following information:

- E-mail address
- Password

The user is required to acknowledge agreement with our Terms of Use which are available on the website.



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

### A. Methods of analysis

Nuts2Invest uses proprietary software, for which a patent is pending, to analyze a broad range of factors to develop individualized rankings and recommendations given a user's specific profile. This includes, among other things, historical and current returns, volatility, fees, management tenure, management performance, yield and various modern portfolio theory statistics. The main sources of information used by Nuts2Invest in making recommendations include detailed historical and current information, and performance and volatility data. No tax implications are considered by Nuts2Invest since tax situation may differ for each individual.

Nuts2Invest's rankings and portfolio recommendations cannot be interpreted as a guarantee of future performance. Investing in securities involves risk of loss that clients should be prepared to bear. For a more detailed explanation of the risks involved, see Items 8B and 8C.

### B. Material risks

- Nuts2Invest conducts its analyses using detailed historical information. As with any investment, a fund's past performance is no guarantee of its future success.
- Nuts2Invest relies on third parties for the provision of market statistics, individual company stock performance and volatility, fund details, performance and volatility information and although these parties are reliable and reputable, there may be inaccuracies or discrepancies in the information that is beyond Nuts2Invest's control.
- Nuts2Invest basis its rankings on information provided by the user, and relies on the user to provide accurate information that appropriately describes the user's preferences, goals and related information. If the user provides inaccurate information, this will impact the relevance of the rankings and/or portfolio construction recommendation to the user.

### C. Material risks specific to types of securities

Nuts2Invest's services as at public launch will focus on Direct Contribution Plans (401k, 403b, 457b,...), IRA/Roth IRA, Mutual funds, ETFs, and individual company stocks and bonds. There is no guarantee that a financial security (stocks, bonds, mutual funds or an ETFs) will achieve its objective. Their price fluctuates because of many factors, which means you could lose money by investing in them. For a full appreciation of the risks inherent in any specific fund, clients should read the prospectus of the fund in question.

The following summarizes principal risks related to a financial security investing, but this is not intended to be exhaustive or to replace the risks detailed in any mutual fund/ETF prospectus:

- a) General: As with any investment, you could lose all or part of your investment in a financial security, and its performance can trail that of other investments.
- b) Market risk: Financial securities can lose money over short periods due to short-term market movements and over longer periods during market downturns.
- c) Equity Securities risk: Equity securities (stocks) are subject to changes in value and their values may be more volatile than other asset classes. Stocks generally fluctuate in value more than bonds and may decline significantly over short time periods. The value of a stock in which the mutual fund/ETF invests may decline due to general weakness in the stock market or because of factors that affect a company or a particular industry.
- d) Asset class risk: Securities in the mutual fund's or ETF's portfolio or underlying index may underperform in comparison to the general securities markets or other asset classes.
- e) Issuer Risk: Mutual fund/ETF performance depends on the performance of individual securities in which the fund invests. Changes to the financial conditions or credit rating of an issuer of those securities may cause the value of the securities to decline.
- f) Market trading risks: Financial securities may face numerous market trading risks, including potential lack of an active market for the shares, losses from trading in secondary markets, and disruption in the creation/redemption process of the mutual fund/ETF.
- g) Non-diversification risk: Mutual fund/ETF may invest a large portion of its assets in securities issued by or representing a small number of issuers. As a result, their performance may depend on the performance of a small number of issuers.
- h) Tracking error risk: Mutual funds/ETFs that track an index may not replicate the index exactly and the performance of the mutual fund/ETF may diverge from that of the underlying index.
- i) Passive investment risk: Mutual funds/ETFs that track an index/passive funds are not actively managed and do not attempt to take defensive positions in declining markets.
- j) Active management risk: Mutual funds/ETFs that are actively managed may be subject to the risk that the investment adviser's judgments about the attractiveness, value, or potential appreciation of their investments may prove to be incorrect. If the securities selected and strategies employed by the mutual fund/ETF fail to produce the intended results, they could underperform other mutual funds/ETFs with similar objectives and investment strategies.
- k) Investment style risk: Different investment styles tend to shift in and out of favor, depending on market conditions and investor sentiment. Mutual fund's/ETF's approach to investing (growth/balanced/value) could cause it to underperform other mutual funds/ETFs that employ a different investment style.
- l) Market capitalization risk: Some mutual funds/ETFs invest in small-cap companies. These funds may be more volatile than mutual funds/ETFs that focus on securities issued by larger companies. Smaller

companies are typically more sensitive to changes in overall economic conditions and their securities may be difficult to trade.

m) Foreign investing risk: Some mutual funds/ETFs invest in foreign markets. In such cases, there is the risk that their investments in foreign securities may be adversely affected by political and economic conditions overseas, reduced liquidity, or decreases in foreign currency values relative to the U.S. dollar.

n) Derivatives risk: To the extent Mutual fund/ETF uses futures and options, it is exposed to additional volatility and potential losses.

## **Item 9: Disciplinary Information**

A. Neither Nuts2Invest, nor any of our employees, has had any civil or criminal actions brought against them.

B. Neither Nuts2Invest, nor any of our employees, has had any administrative proceedings before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority.

C. Neither Nuts2Invest, nor any of our employees, has had any proceedings before a self-regulatory organization.

## **Item 10: Other Financial Industry Activities and Affiliations**

A. No employees are registered, or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

B. No employees are registered, or have an application pending to register, as a futures commission merchant, commodity pool operator or a commodity trading advisor.

C. Nuts2Invest does not have arrangements or relationships with any related parties.

D. Nuts2Invest intends to derive revenue from affiliate programs and advertisements by third parties utilizing banners and posters of various sizes and configurations that appear as advertisements on the website. These programs will in no way impact Nuts2Invest's independence and the unbiased nature of its recommendations, and do not create any conflicts of interest.

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

A. Nuts2Invest has adopted a Code of Ethics (the “Code”) consistent with the Investment Advisers Act of 1940. The adopted Code follows the CFA Institute Code of Ethics and Standards of Professional Conduct. The Code establishes and reinforces a standard of business conduct that is expected of persons associated with Nuts2Invest, and provides specific guidance related to avoiding actual or apparent conflicts of interest. The Code emphasizes certain governing principles Nuts2Invest personnel should always be mindful of in the course of their work, including the duty at all times to place the interest of clients first, the protection of material non-public information, and the obligation to report violations of the Code of Ethics and any applicable laws.

B. Neither Nuts2Invest, nor any of our employees, recommends to clients, or buys or sells for client accounts, securities in which we have a direct material financial interest. Nuts2Invest does not have investment authority, discretionary or otherwise, to purchase any securities on behalf of investors/users. Once a portfolio construction has been generated by the website based on specific direction of investor/user, it is in the discretion of the investor/user whether or not to enter into a transaction, when to enter into any such transaction and which broker-dealer to use for the execution thereof. However, Nuts2Invest’s employees including officers could possibly purchase securities for their own accounts which may, in certain instances, be the same securities as those recommended to users. The securities which are recommended to clients are based on each user’s specific directions which include their willingness to take risk. Any such purchase of the same securities would, therefore, be coincidental.

C. Nuts2Invest does not buy securities for its own account. Therefore, no potential conflict of interest exists at the firm level. Employees may own stocks, bonds, funds, ETFs which are also held by clients, but since client portfolios are based on the approach described above, including the individual stock/mutual fund/ETF recommendations using the Nuts2Invest sorting and ranking rules, which is objective and non-biased, no actual conflict arises and any common investments would be coincidental and are not at the prejudice of our clients. In addition, client trades are primarily limited to company stocks, company bonds, mutual funds and ETFs, which are highly liquid in nature and therefore would not create conflict of interest situations.

D. As mentioned in Item 11C, Nuts2Invest does not buy securities for its own account. Therefore, no potential conflict of interest exists at the firm level. Employees may desire to trade securities that the firm is recommending for clients but, for the reasons described in Item 11C, no actual conflict arises and any common investments are not at the prejudice of our clients.

## Item 12: Brokerage Practices

A. Nuts2Invest does not select or recommend broker-dealers for client transactions. Nuts2Invest does not have the discretionary authority to determine the broker-dealer to be used or the commission rates to be paid and therefore clients are responsible for their own broker-dealer transactions, including the commissions payable as discussed in details in Item 11.

Nuts2Invest may join various affiliate programs through which broker-dealers may advertise on the Nuts2Invest website. When a user clicks on a banner or similar advertisement on Nuts2Invest website, Nuts2Invest will get paid a cost-per-click (CPC) fee in accordance with the affiliate program. The affiliate programs have no bearing on the advice or recommendations given on the Nuts2Invest website. Search results and rankings of financial securities on Nuts2Invest are entirely objective, and are not based on any arrangements or relationships that Nuts2Invest may have with any service providers. Sponsored listings are not entertained and there are no conflicts of interest that arise.

### 1. Research and Other Soft Dollar Benefits:

Nuts2Invest does not pay for any products, research or services from any brokers.

a. We do not use client brokerage commissions in order to obtain research or other services.

b. Since we do not use client brokerage commissions to obtain research or other services, we have no incentive in recommending a specific broker-dealer to clients. Clients are therefore responsible for selecting their own broker-dealer to execute trades.

c. We do not cause clients to pay commissions higher than those charged by other broker-dealers in return for soft dollar benefits.

d. No soft dollar benefits are received in respect of any client accounts with Nuts2Invest, and no client accounts are given preferential treatment above others with respect to these types of benefits.

e. Nuts2Invest does not pay for any products, research or services with client brokerage.

f. Nuts2Invest does not direct commissions to broker-dealers in return for soft dollar benefits.

### 2. Brokerage for Client Referrals.

Nuts2Invest does not receive any referrals for selecting any brokerage as broker-dealer.

### 3. Directed Brokerage.

a. As discussed above, Nuts2Invest does not have investment authority, discretionary or otherwise, to purchase any securities on behalf of users. Once a recommendation or ranking has been generated by the Nuts2Invest website, it is in the discretion of the user whether or not to enter into a transaction based on any such recommendation, when to enter into any such transaction and which stockbroker to use for the execution thereof. We do not recommend, request or require that any client direct Nuts2Invest to execute transactions through a specified broker-dealer.

B. As outlined in item 12A, Nuts2Invest does not aggregate the purchase or sale of securities for client accounts. Clients may lose the possible advantage of lower commissions that are sometimes derived through the aggregation of orders for multiple clients but have the benefit of executing through their own designated broker-dealer.

### **Item 13: Review of accounts**

A. Nuts2Invest does not review client accounts nor do we provide reports on specific accounts. Clients who have registered for the Nuts2Invest services have the ability to view all their brokerage accounts online at their convenience, and based on Nuts2Invest recommendations from time to time, take appropriate action at their discretion.

B. Nuts2Invest may from time to time send alerts, emails and other notifications to clients if our system detects particular market movements or conditions that may be relevant to the client based on the client's preferences as indicated to us via the website.



#### **Item 14: Client referrals and other compensation**

A. Nuts2Invest does not directly or indirectly compensate any person for client referrals.

B. Neither Nuts2Invest, nor any of our employees, receives any economic benefit from any outside parties for providing investment advice to our clients.

## **Item 15: Custody**

Nuts2Invest does not have custody of client funds. Client funds are held under the custody of the custodian selected by the client.

Clients should confirm the frequency of account statements directly with their custodian. These statements should be reviewed carefully.

**Item 16: Investment Discretion**

Nuts2Invest does not have discretionary authority to manage securities accounts on behalf of clients.

## **Item 17: Voting Client Securities**

Nuts2Invest does not have authority to vote client securities. Client securities will be held in accordance with the terms and conditions of the broker-dealers selected by clients. Proxies or other solicitations will not be available through Nuts2Invest. For information on whether clients will receive proxies or other solicitations directly from a custodian, transfer agent or other party, clients should check directly with their broker-dealers.

## **Item 18: Financial Information**

A. Nuts2Invest does charge annual subscription fees to investors/users for use of the tools provided on our website.

B. There are no financial conditions that are likely to impair Nuts2Invest's ability to meet our contractual commitments to clients.

C. Nuts2Invest has not been the subject of a bankruptcy petition.

## Item 19: Requirements for State-Registered Advisers

A. Identification of each of our principal executive officers and management persons, and description of their formal educations and business backgrounds.

**Sunil Kulkarni – CEO and CCO:** Sunil holds a PhD in engineering (North Carolina State University), an MBA (The University of Chicago), a CFA designation, and is a registered representative in the USA for several years. Sunil's vision led to the conceptualization of Nuts2Invest, where he now operates as the CEO. Sunil has 19+ years of management experience in capital goods industry and 6 years of experience in the investment field.

B. Description of any business in which we are actively engaged (other than giving investment advice) and the approximate amount of time spent on that business.

Nuts2Invest has no other business interest than documented in this brochure.

C. In addition to the description of our fees in response to Item 5 of Part 2A, if our firm or a supervised person is compensated for advisory services with performance-based fees, we must explain how these fees will be calculated. Further, we must disclose specifically that performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client.

We do not charge performance-based fees.

D. If our firm or a management person has been involved in one of the events listed below, we must disclose all material facts regarding the event.

1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:

- (a) an investment or an investment-related business or activity;
- (b) fraud, false statement(s), or omissions;
- (c) theft, embezzlement, or other wrongful taking of property;
- (d) bribery, forgery, counterfeiting, or extortion; or
- (e) dishonest, unfair, or unethical practices.

We have nothing to disclose in this regard.

2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:

(a) an investment or an investment-related business or activity;

(b) fraud, false statement(s), or omissions;

(c) theft, embezzlement, or other wrongful taking of property;

(d) bribery, forgery, counterfeiting, or extortion; or

(e) dishonest, unfair, or unethical practices.

We have nothing to disclose in this regard.

E. In addition to any relationship or arrangement described in response to Item 10.C. of Part 2A, we must describe any relationship or arrangement that our firm or any of our management persons have with any issuer of securities that is not listed in Item 10.C. of Part 2A.

We have nothing to disclose in this regard.

**Nuts2Invest.com, LLC**

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