



StreetOne Investment Management, LLC.  
Form ADV Part 2A – Appendix 1  
Wrap Fee Program Brochure

March 28, 2019

**ITEM 1 COVER PAGE**

This Wrap Fee Program brochure provides information about the qualifications and business practices of StreetOne Investment Management, LLC. (hereinafter "StreetOne"). If you have any questions about the contents of this brochure, please contact our Chief Compliance Officer at 1-212-671-1030, or visit us at [www.streetone.com](http://www.streetone.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. StreetOne Investment Management, LLC. is a registered investment adviser. Registration of an investment adviser does not imply a certain level of skill or training.

Additional information about StreetOne is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **ITEM 2 MATERIAL CHANGES**

Since the initial filing on December 2, 2016 this ADV Part 2A Wrap Fee Program Brochure has been materially amended as follows on January 06, 2017. This list summarizes changes to Voting Client Securities, StreetOne Proxy Voting Policy.

Clients will need to sign on to our custodian Folio Institutional at <https://www.folioclient.com>, which offers Folio Vote, an online service that provides access to proxy and other corporate action information as well as an integrated ballot for casting proxy votes. Neither we nor our custodian offer any consulting assistance regarding proxy issues to clients.

On November 13, 2017 our Form ADV Part 2A and 2B was updated to reflect our new office address.

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## ITEM 4 Services, Fees and Compensation

StreetOne provides investment advisory services to retail clients. StreetOne generally exercises investment discretion for each account that it manages. However, the account composition within the same investment strategy may at any given time differ as to model composition. As a result, the performance of an account within a particular investment strategy may differ from other accounts within that same investment strategy. Clients should not expect that the performance of their portfolios will be identical to that of the average for that investment strategy. These differences in portfolio composition are attributable to a variety of factors, including, but not limited to, the type of account (e.g., manner of trade execution), sizes and significant account activity (e.g., significant number of contributions and/or withdrawals).

StreetOne executes purchases and sales of securities on behalf of its clients through broker-dealer firms StreetOne selects including those which, from time to time, furnish StreetOne with investment research information and other services. In executing trades for its retail client accounts StreetOne uses its best efforts to obtain the best available price and most favorable execution.

StreetOne is registered as an "Internet-Only" investment advisor pursuant to Section 203A-2(e) of the Advisers Act. Under this registration, StreetOne provides its investment advice solely through its interactive website at <https://www.streetone.com>. StreetOne's investment advisory service is not available to clients via telephone conversations or communications through other means such as U.S. mail, courier or email (other than operational emails). StreetOne does not meet with clients at its offices. All advice, support and inquiries are delivered through StreetOne's interactive website.

Clients register at StreetOne's website with a personal user id and a password. Taking into consideration clients' preferences, StreetOne devises a customized ETF and/or stock portfolio specific to each client's needs. Given the individual profiles, portfolios thus devised may include US Equity, International Equity, Emerging Equity, Commodities, Real Estate, Fixed Income, Digital Currency, and Inflation protection.

Currently, the StreetOne platform offers the following account types:

- Individual-Taxable
- Traditional IRA, Roth IRA, IRA Rollover

Accounts held under this program are eligible for comprehensive risk-management enabled by our proprietary risk-management technology.

### StreetOne Investment Management Wrap Fee Program

Accounts are custodied at Folio Investments, Inc. and charged a wrap fee. This wrap fee includes all portfolio management costs, trading costs, custodial costs, and operational costs. There are no sales charges or commissions ever paid. All portfolio management services offered in the program are managed internally. Therefore, no portion of the annual fee is paid to outside portfolio managers. Please find a fee schedule below. Fees are charged based on the average daily total size of all accounts on a monthly basis. Fees are charged on the client level, meaning the sum of all accounts managed under a unique tax identification number is considered when calculating fees. Fees are not negotiable. StreetOne does not allow clients to prepay fees.

Total Client Assets	Management Fee
\$100 - \$49,999	0.75%*
\$50,000 - \$99,999	0.55%
\$100,000 - \$249,999	0.35%
\$250,000 - \$999,999	0.30%
\$1,000,000 - \$1,999,999	0.25%
\$2,000,000 and up	0.20%

\*The minimum annual management fee for the StreetOne wrap fee program is \$60.

This is a tiered fee schedule. When a breakpoint is surpassed, the fees assessed are reduced only for the assets above each breakpoint. For example, if the fee for the first \$49,999 in assets is 0.75% and the fee for assets between \$50,000 and \$99,999 is 0.55%, only the assets above \$49,999 are assessed the lower 0.55% fee. The first \$49,999 would still be assessed a full 0.75%.

The total fees referenced above are inclusive of the StreetOne Management Fee and the fee for Custodial Services and Trade Execution Costs (known as a “wrap fee”). The wrap fee may cost the client more than if the services were purchased separately.

StreetOne reserves the right to waive the minimum fees. The fee is calculated as a prorated amount of a client’s average daily balance over a calendar month and deducted from client’s accounts on a monthly basis. AUM is based on the total assets of all accounts under the same tax identification number.

StreetOne chooses to offer the wrap fee pricing structure because of the convenience, transparency, and consistency to the client. If the services were purchased separately, the client would pay varying fees each month based on **the number of trades executed**.

## Additional Fees

StreetOne’s wrap program fee is inclusive of all management fees, custodian fees, and transaction fees, except for any special fees that may be charged by the custodian (for details, see <https://www.folioinstitutional.com/resources/service-fees.jsp>). Expense ratios charged by third-party ETF companies (only applicable for clients who allocate to ETFs) are not included in the wrap fee. ETF expenses are deducted from the price of the securities when purchased on the exchange, not from a client’s account.

## Compensation to Persons Recommending the Wrap Fee Program

StreetOne expects to run periodic promotional campaigns to attract Clients to open Accounts on the site. These promotions may include additional Account services or products offered on a limited basis to select Clients, more favorable fee arrangements, and/or reduced or waived advisory fees for Clients. These arrangements may create an incentive for a third-party or other existing Client to refer prospective Clients to StreetOne, even if the third-party would otherwise not make the referral. These arrangements may also create a conflict of interest for a Client to maintain a certain level of assets managed through StreetOne if doing so would result in eligibility to receive an incentive, bonus or additional compensation. StreetOne may also pay pre-determined fees to third-parties for driving new users to StreetOne, which may be in the form of so-called CPM, CPC or CPA arrangements (respectively, impressions, clicks or actions through other websites). StreetOne engages solicitors whom it pays for Client referrals. StreetOne discloses this practice in writing to the affected Clients and complies with the requirements of Rule 206(4)-3 under the Investment Advisers Act of 1940, as amended, to the extent required by applicable law.

### StreetOne's assets under management (as of March 27, 2019)

Discretionary:	\$151,988
Non-Discretionary:	0
Total:	\$151,988

## ITEM 5 Account Requirements and Types of Clients

### Account Minimums

These minimums are calculated across all accounts opened by a client, under a unique Tax Identification Number. StreetOne reserves the right at its sole discretion to deny any account size or waive any minimum listed below.

The Account minimum for the StreetOne Investment Management Wrap Fee program is \$100.

### Types of Clients

StreetOne provides portfolio management services to the types of clients described below. Where relevant, this disclosure also includes information about the minimum account size necessary to open and maintain each type of client account. See Item 5 for a discussion of StreetOne's compensation for managing each of the following types of client accounts.

#### Retail Individual Investor Accounts

StreetOne provides portfolio management services to individual investor accounts. StreetOne's management of the individual investor's account will be consistent with the particular investment model or models the client selected for that account. The menu of investment models which StreetOne may make available to individual clients, a brief description of each model's investment objective(s), along with the investment strategies used to achieve the objective and the material risks associated with such investment strategies, is available at <http://www.streetone.com>. Additional detail about each model may be obtained at no charge by contacting StreetOne at 1-212-671-1030.

## ITEM 6 Portfolio Manager Selection and Evaluation

### Selection and Review of Portfolio Managers

StreetOne does not outsource portfolio management to any outside managers.

### Portfolio Performance Evaluations

StreetOne uses industry standards to measure its performance. All performance will be presented to clients in both annualized and cumulative terms, and clearly labeled as such. StreetOne does not use any third party audits or sources to review and verify its performance. All performance on the site is shown on a model trading basis and is typically shown gross of any program fees.

### Related Persons as Portfolio Managers and Conflicts of Interest

StreetOne does not select any outside portfolio managers. There are no conflicts of interest because StreetOne is the sole manager and there are no other portfolio managers that participate in the program.

### Portfolio Manager for Wrap Fee Programs

StreetOne acts as the portfolio manager for all clients.

### Client Tailored Services and Investment Restrictions

StreetOne offers an interactive online platform, which is available 24/7/365, where clients can change their investment profile and personal details at any time.

### Wrap Fee Participation

Clients pay a percentage of the total wrap fee to the custodian and wrap fee broker, Folio Investments, Inc. The remainder is remitted to StreetOne.

### Performance Based Fees and Side-by-Side Management

StreetOne does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

### Methods of Analysis, Investment Strategies & Risk of Loss

#### A. Our methods of analysis and investment strategies

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.** StreetOne customizes portfolios for clients on signup using criteria which include age, goals, account type, account size, investment time horizon and risk tolerance.

StreetOne employs a multi-dimensional strategy that can adapt to and perform well in all types of market environments. This involves combining methodologies that have different uncorrelated return streams, such as intermediate-term momentum methodologies and short-term countertrend methodologies.

This methodology's aim is to protect against large losses during market downturns, while still positioning investors for gains when the market is trending upward. Our proprietary quantitative engine analyzes trends and countertrends, positioning investments according to confirmed information from the markets. The approach includes a strategy not only for markets with a clearly defined trend, but also for choppy, directionless markets.

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The following strategies are employed, based on the client's risk profile characteristics

**Capital Preservation** The portfolio will typically be invested primarily in lower volatility assets. Investors in this category have a low tolerance for risk and typically a short term investment time horizon.

**Conservative Growth** The portfolio will typically include lower volatility assets as well as some exposure to growth or higher volatility assets. Investors in this category have some tolerance for risk and typically a short to medium-term investment time horizon.

**Moderate Growth** The portfolio may include exposure to all asset classes including low volatility and growth/higher volatility assets. Investors in this category have a moderate tolerance for risk and typically a medium-term investment time horizon.

**Growth** The majority of the portfolio will typically be invested in a blend of growth/higher volatility assets. Investors in this category have a moderate to high tolerance for risk and typically a medium to long-term investment time horizon.

**Aggressive Growth** The portfolio may be invested primarily in growth/higher volatility assets and may have a greater proportion of higher risk investments. Investors in this category have a high tolerance for risk and typically a long-term investment time horizon.

## B. Material Risks

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

### Stock Market Risk

The value of the stocks and other securities owned in a Strategy will fluctuate depending on the performance of the companies that issued them, general market and economic conditions, and investor confidence. The market also may fail to recognize the intrinsic worth of an investment or StreetOne may misgauge that worth.

### Strategy Turnover

The Strategies do not have any limitations regarding portfolio turnover and may have turnover rates in excess of 100%. A portfolio turnover rate of 100% is equivalent to a portfolio buying and selling all of the securities in its portfolio once during the course of a year. The turnover rates of the Strategies may be higher than other Strategies with the same investment objectives. Higher strategy turnover rates may create adverse tax consequences.

### Company Risk

The stocks in the Strategies may not perform as expected. Common factors that can negatively affect a particular stock's price include poor earnings reports by the issuer, a restatement of earnings by the issuer, loss of major customers or management team members, major litigation against the issuer, or changes in government regulations affecting the issuer or its industry.



### **Opportunity & Strategy Risk**

There is the risk of missing out on an investment opportunity because the assets necessary to take advantage of that opportunity are held in other investments. The business of investing in securities is highly competitive and the identification of attractive investment opportunities is difficult and involves a high degree of uncertainty.

### **Industry and Sector Risk**

Companies that have similar lines of business are grouped together in broad categories called industries. Certain industries are grouped together in broader categories called sectors. StreetOne may overweight specific industries within various sectors in a Strategy. The fact that StreetOne may overweight a Strategy's holdings in a specific industry or industries may cause a Strategy's performance to be more susceptible to the economic, business, or other developments that affect those industries or sectors. This overweighting means a Strategy may be less diverse and more volatile than its benchmark.

### **Exchange-Traded Fund ("ETF") Risks, including Net Asset Valuations and tracking error**

ETF performance may not exactly match the performance of the index or market benchmark that the ETF is designed to track because 1) the ETF will incur expenses and transaction costs not incurred by any applicable index or market benchmark; 2) certain securities comprising the index or market benchmark tracked by the ETF may, from time to time, temporarily be unavailable; and 3) supply and demand in the market for either the ETF and/or 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. 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.

Clients should be aware that to the extent they invest in ETF securities they will pay two levels of advisory compensation – advisory fees charged by StreetOne plus any management fees charged by the issuer of the ETF. This scenario may cause a higher advisory cost (and potentially lower investment returns) than if a Client purchased the ETF directly. An ETF typically includes embedded expenses that may reduce the fund's net asset value, and therefore directly affect the fund's performance and indirectly affect a Client's portfolio performance or an index benchmark comparison. Expenses of the fund may include investment advisor management fees, custodian fees, brokerage commissions, and legal and accounting fees. ETF expenses may change from time to time at the sole discretion of the ETF issuer. ETF tracking error and expenses may vary

### **Cyclical Analysis**

Economic/business cycles may not be predictable and may have many fluctuations between long term expansions and contractions. The lengths of economic cycles may be difficult to predict with accuracy and therefore the risk of cyclical analysis is the difficulty in predicting economic trends and consequently the changing value of securities that would be affected by these changing trends.

### **Use of Leverage**

Leverage may be used in investment and trading, generally through purchasing inherently leveraged instruments such as

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exchange-traded funds. The prices of leveraged instruments can be highly volatile, and investments in leveraged instruments may, under certain circumstances, result in losses that exceed the amounts invested.

**Institutional Risk**

Securities and futures exchanges typically can suspend or limit trading in any instrument traded on the exchange resulting in substantial losses.

### Database Risk

Our strategies rely on proprietary databases and third party data sources. As a result, any errors in the underlying data entry, database or the assumptions underlying the strategies may result in a portfolio acquiring or selling investments based on incorrect information. When strategies and data prove to be incorrect, misleading, flawed or incomplete, any decisions made in reliance thereon expose our clients to potential risks. For example, by relying on our strategies and data, we may be induced to buy certain investments at prices that are too high, to sell certain other investments at prices that are too low, or to miss favorable opportunities altogether. Similarly, any hedging based on faulty strategies and data may prove to be unsuccessful. As a result, the portfolio could incur losses on such investments before the errors are identified and corrected. We do not reimburse the portfolios or Clients for database errors.

While this information provides a synopsis of the events that may affect your investments, this listing is not exhaustive. We want you to understand that there are inherent risks associated with investing and depending on the risk occurrence, you may suffer **LOSS OF ALL OR PART OF YOUR PRINCIPAL INVESTMENT**.

### Recommendations of Particular Types of Securities

#### Equities

Equity investment generally refers to buying shares of stocks by an individual or firms in return for receiving a future payment of dividends and capital gains if the value of the stock increases. There is an innate risk involved when purchasing a stock that it may decrease in value and the investment may incur a loss.

Common stocks are susceptible to general stock market fluctuations and to volatile increases or decreases in value as market confidence in and perceptions of the company who issued the stock change. If an investor held common stock, or common stock equivalents, of any given company, they would generally be exposed to greater risk than if they held preferred stock and/or debt obligations of the company. Common stocks are often holdings within mutual funds and ETFs.

#### ETFs

StreetOne will also use Exchange traded funds ("ETFs") which are professionally managed pooled vehicles that invest in stocks, bonds, short-term money market instruments, other mutual funds, other securities or any combination thereof. ETFs' managers trade fund investments in accordance with fund investment objectives. 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 (i.e. borrow money) to a significant degree, or concentrate in a particular type of security (i.e. equities) rather than balancing the fund with different types of securities. ETFs can be bought and sold throughout the day like stock and their price can fluctuate throughout the day. During times of extreme market volatility, ETF pricing may lag versus the actual underlying asset values. This lag usually resolves itself in a short period of time (usually less than one day), however, there is no guarantee this relationship will always occur. The market price of ETFs and HOLDRs traded on the secondary market is subject to the forces of supply and demand and thus independent of the ETFs NAV. This can result in the market price trading at a premium or discount to the NAV which will affect an investment's value.

## **Fixed-Income**

Investments in fixed-income securities are subject to interest rate risk and credit risk, including changes in debt ratings.

**Interest Rate Risk:** When interest rates change, the value of a Strategy's fixed-income investments will be affected. Debt securities tend to move inversely with changes in interest rates. For example, when interest rates rise, debt security prices generally fall.

**Credit Risk:** The value of the debt securities held by a Strategy fluctuates with the credit quality of the issuers of those securities. A Strategy could lose money if the issuer of a security is unable to meet its financial obligations or goes bankrupt. Failure of an issuer to make timely payments of principal and interest or a decline or perception of decline in the credit quality of a debt security can cause the price of the debt security to fall.

**Changes in Debt Ratings:** If a rating agency gives a debt security a lower rating, the value of the security will decline because investors will demand a higher rate of return.

**High-Yield Bond Funds:** The investor should note that the funds and sub-accounts that invest in lower-rated debt securities involve additional risks because of the lower credit quality of the securities in the Strategy. The investor should be aware of the possible higher level of volatility and increased risk of default.

**Tax-Free Municipal Bond Funds:** The investor should note that the income from tax-free municipal bond funds may be subject to state and local taxation and the Alternative Minimum Tax.

**Bank Loan/Senior Debt Funds:** Funds that contain bank loans and senior loans are impacted by risks associated with fixed income in general, including interest rate risk and default risk. Because they often invest in non-investment grade issues, the risk of default is high. These securities are also relatively illiquid. Funds that invest in bank loans or senior debt are often highly leveraged, which will produce a higher than normal level of volatility.

## **REITs**

REITs (Real Estate Investment Trusts) have specific risks including valuation due to cash flows, dividends paid in stock rather than cash, and the payment of debt resulting in dilution of shares.

## **Precious Metal ETFs**

(Gold, Silver, and Palladium Bullion backed "electronic shares" not physical metal). Investing in precious metal ETFs carries the risk of capital loss.

## **Temporary Defensive Investments**

In times of unstable or adverse market or economic conditions, StreetOne may purchase up to 100% of a Strategy's assets in temporary defensive instruments in an effort to enhance liquidity or preserve capital. Temporary defensive investments generally include cash, cash equivalents such as commercial paper, money market instruments, foreign time deposits, short-term debt securities, U.S. government securities, ETFs, inverse ETFs, or repurchase agreements. A Strategy could also hold these types of securities pending the investment of proceeds from the sale of securities held in a Strategy. A Strategy may be invested in temporary defensive investments for undetermined periods of time, depending on market or economic conditions. To the extent StreetOne invests defensively in these securities, it might not achieve a

Strategy's investment objective.

### **Small and Mid-Size Company Risk**

StreetOne may purchase securities in small or mid-size companies for a Strategy. While small and mid-size companies may offer greater potential for capital appreciation than larger and more established companies, they may also involve greater risk of loss and price fluctuation. The trading markets for securities of small-cap issuers may be less liquid and more volatile than securities of larger companies. This means that StreetOne could have greater difficulty buying or selling a security for the Strategy of a small-cap issuer at an acceptable price, especially in periods of market volatility.

### **Foreign Investment Risk**

Foreign securities refer to securities of issuers, wherever organized, that, in StreetOne's judgment, have their principal business activities outside of the United States. Investments in foreign securities involve different risks than U.S. investments, including fluctuations in currency exchange rates, potentially unstable political and economic structures, less efficient trade settlement practices, reduced availability of public information, and lack of uniform financial reporting and regulatory practices similar to those that apply to U.S. issuers. Foreign stock markets may also be less liquid than U.S. stock markets.

### **ADRs**

American Depositary Receipts and American Depositary Shares (collectively, "ADRs"). ADRs are receipts representing shares of a foreign corporation held by a U.S. bank that entitle the holder to all dividends and capital gains on the underlying foreign shares. ADRs are typically denominated in U.S. dollars and trade in the U.S. securities markets. ADRs are subject to many of the same risks as direct investments in foreign securities, including the risk that material information about the issuer may not be disclosed in the United States and the risk that currency fluctuations may adversely affect the value of the ADR.

## **Voting Client Securities**

### **StreetOne Proxy Voting Policy**

As a matter of firm policy, we do not vote proxies on behalf of clients. Therefore, although our firm may provide investment advisory services relative to client investment assets, clients maintain exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other events pertaining to the client's investment assets. Clients will need to sign on to our custodian Folio Institutional at <https://www.folioclient.com>, which offers Folio Vote, an online service that provides access to proxy and other corporate action information as well as an integrated ballot for casting proxy votes. Neither we nor our custodian offer any consulting assistance regarding proxy issues to clients.

## **ITEM 7 Client Information Provided to Portfolio Managers**

StreetOne communicates detailed client information to its portfolio management team including age, risk tolerance, and income level if available. Updated information on current clients is available to StreetOne's portfolio management team through its internal database. When a client submits a support request, StreetOne's portfolio managers can view the client's updated information instantly.

## ITEM 8 Client Contact with Portfolio Managers

On the StreetOne platform, clients have the ability to submit questions through an email support system.

## ITEM 9 Additional Information

### Disciplinary Information, Other Financial Industry Activities and Affiliations

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

#### A. Registration as a Broker/Dealer or Broker/Dealer Representative

Neither StreetOne nor its representatives are registered as a broker/dealer or as representatives of a broker/dealer.

#### B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

Neither StreetOne nor its representatives are registered as a FCM, CPO, or CTA.

#### C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests

Neither StreetOne nor its representatives have any material relationships to this advisory business that would present a possible conflict of interest.

#### D. Selection of Other Advisors or Managers and How This Adviser is Compensated for Those Selections

StreetOne does not receive any compensation to select certain advisors or portfolio managers.

### Code of Ethics, Review of Accounts, Referrals and Financial Information

#### 1. Code of Ethics

StreetOne has a written Code of Ethics that covers the following areas: Ethical Behavior, Conflicts of Interest, Inside Information, Outside Employment and Directorships, Acceptance of Gifts and Entertainment, Confidentiality of Company and Client Information, Privacy, Employment Practices, Workplace Practices, Conduct of Audits and Financial Disclosures, Anti-Money Laundering, Compliance and Reporting Procedures, Reporting Violations, and Waivers of the Code. All prospective and current clients have a right to see our Code of Ethics. To request a copy of our Code of Ethics please email our compliance staff at [support@streetone.com](mailto:support@streetone.com).

#### 2. Selection of Other Advisors or Managers and How This Adviser is Compensated for Those Selections

StreetOne does not receive any compensation to select advisors or portfolio managers.

#### 3. Recommendations Involving Material Financial Interests

StreetOne does not recommend that clients buy or sell any security in which a related person to StreetOne has a material financial interest.

**4. Investing Personal Money in the Same Securities as Clients**

From time to time, representatives of StreetOne may buy or sell securities for themselves that they also recommend to clients. StreetOne will always document any transactions that could be construed as conflicts of interest and will always transact client business before their own when similar securities are being bought or sold.

**5. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews**

StreetOne uses many internal analytics and risk management systems to help monitor accounts. StreetOne's software based financial advisor service assumes that a portfolio created using quantitative techniques will not stay optimized over time, and must be periodically rebalanced to maintain the intended risk level and asset allocations. StreetOne 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.

StreetOne provides all Clients with continuous access via their website to real-time reporting information about Account status, securities positions and balances. Clients may also receive periodic e-mail communications describing portfolio performance, Account information, and product features. StreetOne conducts separate periodic reviews related to the securities used for Client portfolios. These reviews are approved by StreetOne's Investment Committee, which has the authority, if necessary, to take action up to and including the removal, addition or replacement of a security from the portfolios crafted by the StreetOne algorithms.

**6. Factors That Will Trigger a Non-Periodic Review of Client Accounts**

Reviews may be triggered by material market movements, economic or political events, or by changes in the client's risk tolerance or goals. StreetOne's software based market state observer continuously scans the market for structural breaks and may trigger a portfolio rebalance.

**7. Content and Frequency of Regular Reports Provided to Clients**

StreetOne provides an online platform to clients which can be accessed 24/7/365 to receive up to date account analytics, reports, and positions.

**8. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)**

StreetOne does not receive any economic benefit, directly or indirectly from any third party for advice rendered to StreetOne clients.

**9. Compensation to Non-Advisory Personnel for Client Referrals**

StreetOne may enter into solicitation agreements with Registered Investment Advisors (RIAs) or other licensed

financial professionals, as sanctioned by the state that the professional does business. These solicitation agreements allow the financial professionals to receive up to 60% of the revenue StreetOne receives from clients on a monthly basis, for the client referral.

**10. Balance Sheet**

StreetOne does not require nor solicit prepayment of more than \$1,200 in fees per client, six months or more in advance and therefore does not need to include a balance sheet with this brochure.

**11. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients**

Neither StreetOne nor its management have any financial conditions that are likely to reasonably impair our ability to meet contractual commitments to clients.

**12. Bankruptcy Petitions in Previous Ten Years**

Neither StreetOne nor its management have been the subject of a bankruptcy petition in the last ten years.