

## **Item 1: Cover Page**

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

#### **Tradezy RIA, LLC**

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This brochure provides information about the qualifications and business practices of Tradezy RIA, LLC. If you have any questions about the contents of this brochure, please contact us at +1.647.643.2025 and/or [abhishek@tradezyapp.com](mailto:abhishek@tradezyapp.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 Tradezy RIA, LLC also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

Registration with the SEC does not imply a certain level of skill or training.

### **Item 3: Table of Contents**

<b>ITEM 1: COVER PAGE.....</b>	<b>I</b>
<b>ITEM 2: MATERIAL CHANGES (OMITTED) .....</b>	<b>I</b>
<b>ITEM 3: TABLE OF CONTENTS.....</b>	<b>II</b>
<b>ITEM 4: ADVISORY BUSINESS .....</b>	<b>1</b>
<b>ITEM 5: FEES AND COMPENSATION .....</b>	<b>3</b>
<b>ITEM 6: PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT .....</b>	<b>4</b>
<b>ITEM 7: TYPES OF CLIENTS .....</b>	<b>4</b>
<b>ITEM 8: METHODS OF ANALYSIS, INVESTMENT STRATEGIES, AND RISK OF LOSS .....</b>	<b>4</b>
<b>ITEM 9: DISCIPLINARY INFORMATION .....</b>	<b>8</b>
<b>ITEM 10: OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS .....</b>	<b>8</b>
<b>ITEM 11: CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING .....</b>	<b>9</b>
<b>ITEM 12: BROKERAGE PRACTICES .....</b>	<b>9</b>
<b>ITEM 13: REVIEW OF ACCOUNTS.....</b>	<b>9</b>
<b>ITEM 14: CLIENT REFERRALS AND OTHER COMPENSATION .....</b>	<b>9</b>
<b>ITEM 15: CUSTODY .....</b>	<b>10</b>
<b>ITEM 16: INVESTMENT DISCRETION.....</b>	<b>10</b>
<b>ITEM 17: VOTING CLIENT SECURITIES .....</b>	<b>10</b>
<b>ITEM 18: FINANCIAL INFORMATION .....</b>	<b>10</b>
<b>ITEM 19: REQUIREMENTS FOR STATE-REGISTERED ADVISERS .....</b>	<b>10</b>

#### Item 4: Advisory Business

Tradezy RIA, LLC, a Delaware limited liability corporation (“Tradezy RIA,” “we,” “our,” or “us”) provides limited online-only automated investment advisory through a platform (the “Platform”) licensed from our affiliated company Tradezy Platforms, LLC (“Publishing Affiliate”). We were newly formed in 2024. We are wholly owned by Tradezy, Inc., a Delaware corporation, which in turn is owned by Abhishek Mathur and Syed Tamzid.

Tradezy RIA’s advisory services assist clients in identifying and self-reporting their investment objectives, risk profile, and financial sophistication, and, if a client so chooses, facilitates securities trading that is derived from a portfolio maintained by individuals who publish investment-related content on a regular basis for compensation, known herein as a “Trader.” Diligence of Traders is conducted by the Publishing Affiliate to determine whether a Trader should appear on the Tradezy Platform and provide individuals with access to their published content. Once a Trader is onboarded, Tradezy RIA conducts its own suitability screening process to determine whether it will create portfolios derived from that Trader for its clients.

Through the Platform, you can subscribe to the services of Traders. This subscription service is provided by the Publishing Affiliate only, and is not provided by Tradezy RIA. The subscription process is described in this Brochure solely for the purpose of providing background information regarding Tradezy RIA’s advisory services, which operate in conjunction with, but are separate from, the publishing services provided by the Publishing Affiliate. **Neither the Traders nor the Publishing Affiliate provide investment advice, and neither are registered investment advisers.**

Individuals who choose to subscribe to a Trader’s content will be charged a subscription fee determined by each Trader. Subscription fees are paid to the Publishing Affiliate. The Publishing Affiliate will pay a portion of the subscription fee to the corresponding Trader. In addition, and as discussed in more detail at Item 5, the Publishing Affiliate may also share a portion of the subscription fee with Tradezy RIA for providing its advisory services.

Once a person subscribes to a Trader through the Platform, they may then choose to also designate a securities account held at an external brokerage that is technologically compatible with the Platform, so that the account’s investment portfolio is derived from the portfolio of the Trader to which they have subscribed, provided that they meet Tradezy RIA’s client-screening criteria. This is the only securities trading option offered by Tradezy RIA.

A person becomes a client of Tradezy RIA, and will receive its additional advisory services, only once (1) they indicate a desire to create a Trader-derived portfolio and (2) Tradezy RIA determines that the client meets Tradezy RIA’s screening criteria for client suitability. As part of the application process for the advisory account, individuals will be asked to provide certain information about themselves, including information that is designed to help assess their investment objectives, risk profile, and financial sophistication.

**Clients should understand that investment advice is being provided solely by Tradezy RIA, and not by the Publishing Affiliate or any individual Trader.**

### *The Proxy Account*

For each Trader, Tradezy RIA has created a corresponding Proxy Account. Tradezy RIA has funded each Proxy Account only in a nominal manner to mitigate potential conflicts of interest with clients, and maintains each Proxy Account in the same manner as Trader-derived portfolios are maintained for individual clients. This means that the Proxy Account associated with a particular Trader should buy and sell the same securities in approximately the same ratios and at approximately the same times as each of the client securities portfolios associated with that Trader.

For this reason, it is expected that the Proxy Account returns and other information published through the Platform with respect to each Proxy Account will provide clients with meaningful information that they can use to make an assessment of whether they would like to create and maintain a securities portfolio derived from a particular Trader's portfolio. Therefore, Tradezy RIA's Platform presents individuals who subscribe to that Trader with performance information regarding the Proxy Account corresponding to that Trader, rather than the performance of the Trader's outside portfolio.

**It is important to understand that while a client's securities portfolio may be derived from a Trader's portfolio, it is not intended or expected that the client's securities portfolio will duplicate the Trader's portfolio or otherwise provide the client with the same or even a similar return as is obtained by the Trader's portfolio. Clients should further understand that, while it is always Tradezy RIA's goal to provide execution within the same trading day, Tradezy RIA cannot guarantee that the issuance of trade execution orders and resulting executions will not be delayed for a variety of reasons, whether within Tradezy RIA's control or otherwise. These reasons could include, but are not necessarily limited to, trading in securities with low liquidity, trading halts, technical malfunctions with Tradezy or external brokerage systems, unexpected client activity in the client's designated account, or other factors. As a result, investment returns could differ significantly even between different subscribers to the same Trader.**

In addition to the above, Tradezy RIA intends to re-balance each Proxy Account and client account approximately monthly, which will be designed to account for any items that were not accounted for during the daily trading operations (for example, divergence due to dividends, reverse splits, or cash added by the Trader to the Trader's account).

Tradezy RIA only provides electronic disclosures, and as a condition of becoming a Tradezy RIA client, clients must consent to receive electronic disclosures and to receive documents electronically. The Platform will also ask each individual to agree to the terms of Tradezy RIA's advisory agreement, which will be available through the Platform, and may also request or provide other information, or require the execution of other agreements.

**Tradezy RIA's services are limited, and not intended to be a substitute for a client's comprehensive financial plan. Tradezy RIA's advice is high risk and speculative and is not**

**appropriate for a client's entire portfolio or a large fraction of same. Accordingly, Tradezy RIA recommends that its clients also seek the advice of an accountant or financial adviser.**

**Tradezy RIA does not provide accounting, tax, or legal advice to its clients.**

Upon termination of a client's subscription with a Trader, the Publishing Affiliate will notify Tradezy RIA, and Tradezy RIA will cause the client's account to cease tracking the Trader-derived portfolio associated with that Trader. The client is responsible for managing open positions. Likewise, upon termination of a client's advisory relationship with Tradezy RIA (including termination due to the client's decision or non-payment of subscription fees) Tradezy RIA will no longer issue trading instructions on the client's behalf to the client's brokerage, and the client is responsible for managing open positions in the client's account.

At present, we do not offer individualized advice on any topic, including proprietary products. We do not monitor your account or individual investments, other than the rebalancing process noted above. You have full control over which Traders you subscribe to and which assets are made subject to the copy-trading platform, and can close or open securities positions at your discretion.

We do not charge an advisory fee on assets held in your external brokerage accounts. We do not participate in wrap-fee programs.

As of the date of this disclosure, we manage \$0 in client assets on a discretionary basis (which means that our copy-trading service invests client assets without client approval of each trade), and \$0 in client assets on a non-discretionary basis (which means that the clients decide how their money is invested).

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

The Publishing Affiliate is compensated by subscribers based on the fixed monthly subscription cost set by each Trader to whom they subscribe. Within limits set by the Publishing Affiliate, Traders retain flexibility to determine the subscription fee they wish to charge. This fee is not negotiable. The Publishing Affiliate pays a portion of any subscription fees it receives to the relevant Traders and may also pay a portion of such subscription fee to Tradezy RIA for services rendered. Tradezy RIA receives these fees as compensation for providing its advisory services to clients who, as discussed above, also subscribe to a Trader's content through the Publishing Affiliate.

Clients' subscription fee that they already pay as a subscriber does not increase as a result of the client engaging in securities trading. Depending on your external broker, you may incur trading charges and other fees to your broker from trading activity.

As a condition of subscribing to Trader content through the Tradezy Platform, subscribers will be required to provide debit or credit card details and authorize payment to allow the Publishing Affiliate to make automated payments for the purpose of paying the subscriber's monthly

subscription fees. Subscription fees are charged to the subscriber's payment card on the day they initiate service, and monthly thereafter on the same date. Subscription fees are not refunded for any individual Trader subscription for which the subscriber terminates the service prior to the end of the subscription period. The Publishing Affiliate may terminate the account of subscribers that terminate its right to make automated charges to their credit or debit card unless the subscriber establishes new automatic withdrawal arrangements. Clients should be aware that if they cease paying for subscription services then they will also lose access to Tradezy RIA's investment advisory services, including the ability to maintain automated trades based on a Trader's portfolio.

As an internet-only adviser with automated investment advisory, we do not employ any financial professionals. We receive no compensation from third parties for recommending or selling certain investments, nor do we receive compensation from investments that are issued, sponsored, or managed by affiliated companies.

#### **Item 6: Performance-Based Fees and Side-By-Side Management**

We do not earn performance-based fees on our client accounts.

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

Tradezy RIA only provides services to clients over the age of 18 who are individuals, citizens, and tax residents of the United States who meet Tradezy RIA's screening requirements. Tradezy RIA does not impose any minimum income levels for opening an account. Tradezy RIA does not provide services to individual retirement accounts, or accounts held in the name of a trust, corporation, limited liability corporation, partnership, or other entity.

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

Tradezy RIA provides limited advisory services. As discussed in Item 4, these advisory services are intended only to assist in the creation of Trader-derived portfolios for clients and the provision of investment advice regarding the relative risk of creating certain portfolios as compared to other portfolios available on the Platform. This service relies on the information submitted by the client, which includes information regarding their prior experience in investing in US equities, investment goals, and the client's ability to sustain losses. Clients certify on a periodic basis that the information they have submitted is accurate and agree to promptly update Tradezy RIA should it become inaccurate in the future. However, Tradezy RIA does not collect individualized information regarding every aspect of a client's personal financial situation, and, therefore, there may be important client information not considered by Tradezy RIA. Clients should be aware of this limitation when considering Tradezy RIA's limited advisory services. Tradezy RIA does not otherwise provide investment advice or recommendations to, or manage assets on behalf of, clients. Accordingly, Tradezy RIA's services to its clients do not involve the development of comprehensive analysis or investment advice.

Tradezy RIA and its affiliate, the Publishing Affiliate, make money from subscription fees and, therefore, it is in their interest to identify and present Traders who are likely to cause individuals

to subscribe to the Trader, rather than to identify Traders who are likely to be successful investors, who may or may not be the same individuals. Accordingly, the interests of clients and the Publishing Affiliate and Tradezy RIA are not necessarily aligned.

### *Risks*

It is important that you remember that any investing carries risks. On average, the more profitable an investment is likely to be over the long run across a large number of instances, the higher risk of loss; otherwise, everyone would already invest in it and the expected return would decrease. Moreover, even “low-risk” investments may carry latent or unappreciated risks, as we saw in 2007 for example.

The success of any investment strategy will also be affected by general economic and market conditions, such as interest rates, availability of credit, inflation rates, economic uncertainty, changes in laws (including laws relating to taxation of investments) or regulations (or their interpretation), trade barriers, currency exchange controls, and national and international political circumstances (including wars, terrorist acts, or security operations). These factors will affect the level and volatility of the prices of securities and the liquidity of an investment. Illiquidity or significant changes in volatility could impair profitability or result in losses.

You as the investor should be prepared to bear losses in the short, medium, or long term. Investing in a portfolio that corresponds to your risk tolerance may lead to better performance in the long run—if your portfolio is riskier than your personal risk tolerance can handle, you may overreact to losses and have poor performance in the long run.

As explained in Item 4 above, the investments offered through Tradezy RIA are derived from the securities portfolios of the Traders. Tradezy RIA does not influence the trades made by Traders, and Tradezy RIA assumes that these portfolios will reflect a variety of investment strategies and risks of loss, and that these strategies and risks are likely to change over time and, in any event, cannot be meaningfully characterized by Tradezy RIA.

Frequent trading can result in lower overall market returns. On average, investors who hold for the long term tend to outperform investors who make frequent short-term trades. Short-term trading can increase the risk of making impulsive or reckless decisions, especially when the trader is experiencing losses. You should carefully monitor the performance of the Trader or Traders to whom you have subscribed.

Traders may invest in Exchange-Traded Funds, known as ETFs. ETFs are subject to market risk, including the possible loss of principal. The value of the portfolio will fluctuate with the value of the underlying securities. ETFs trade like a stock, and may trade for less than their net asset value due to low market demand for the ETF. Investors should consider an ETF’s investment objective, risks, charges, and expenses carefully before investing. This information can be found in the ETF’s prospectus, which should be read carefully before investing. Additionally, investments in any kind of investment companies, including ETFs, will expose clients’ to the risk that the underlying fund manager may change objectives which may or may not parallel the

investment direction of the Trader. Tradezy RIA, the Publishing Affiliate and the Traders have no control over the managers or investments of underlying funds.

Diversification does not ensure a profit and may not protect against loss in broadly declining markets. Investors should refer to the individual ETF prospectus for a more detailed discussion of the specific risks and considerations for an individual ETF.

ETFs may have underlying investment strategy risks similar to investing in commodities, bonds, real estate, international markets or currencies, emerging growth companies, or specific sectors. As a result, each ETF will have specific risks depending on its investments:

- When investing in bonds, it is important to note that as interest rates rise, bond prices will fall.
- Due to their narrow focus, sector-based investments typically exhibit greater volatility.
- There are special considerations associated with international investing, including the risk of currency fluctuations and political and economic events. Investing in emerging markets may involve greater risk and volatility than investing in more developed countries.
- When investing in real estate companies, property values can fall due to environmental, economic, or other reasons, and changes in interest rates can negatively impact the performance.
- The risk of loss in trading commodities and futures can be substantial. The high degree of leverage that is often obtainable in commodity trading can work against you as well as for you. You should therefore carefully consider whether such trading in ETFs is suitable for you in light of your financial condition.

**Cybersecurity Risk.** As part of our business, Tradezy and third party service providers process, store, and transmit large amounts of electronic information, including information relating to the portfolio transaction. Tradezy and third-party services providers are therefore susceptible to cybersecurity risk. Cybersecurity failures or breaches of Tradezy and third party service providers have the ability to cause disruption and impact business operations, potentially resulting in financial losses, the inability of clients to transact business, violations of applicable privacy and other laws, regulatory fines, penalties, and/or reputational damage.

### **Additional Risks Specific to Tradezy RIA**

**Risk Related to Asymmetric Client Account Structure.** While Tradezy RIA intends for each client's securities portfolio derived from a single Trader-derived portfolio to receive similar execution, differences in each client's account, vis-à-vis those of Tradezy RIA's other clients, may result in asymmetric execution. For example, the amount of cash in one client account versus another client account, the length of time one client's account has been opened versus that of another client, or the technical characteristics of different brokerages and their execution, may lead to two clients following the same Trader-derived portfolio to receive different execution.

**Liquidity Risk.** While small-cap and other securities often present a heightened liquidity risk, *i.e.*, a risk that entering or exiting a position may significantly and adversely impact the position's price, assuming the position can be purchased or sold at all, this risk is likely to be heightened by the fact that all client portfolios that are derived from a particular Trader's portfolio can be expected to buy or sell the same securities at approximately the same time—thereby magnifying the adverse impact on the security's liquidity. Accordingly, while a Trader may be able to execute a trade in, for example, a small-cap stock at a favorable price, multiple

purchases or sales of that same security on behalf of client portfolios may result in significant adverse price movements with respect to the prices experienced by client portfolios. That is, the price obtained by the client portfolios may be significantly adverse to that obtained by the Trader's portfolio. We attempt to mitigate this risk by imposing certain minimum-liquidity metrics on Trader's positions, but such mitigation may not be successful.

***Information Leakage Risk.*** Because of the way client portfolios are managed, it is possible that anyone who has knowledge of the Trader's portfolio or trades can anticipate the trades that will be executed on behalf of clients and use that knowledge to benefit at the expense of the clients. For example, such person could, in advance of the client trades, buy a security that will be purchased by the clients with the expectation of then selling that same security as part of the general trading occurring around client purchases, which sale price can be expected to have increased from the purchase price on account of the impact on prices of the multiple client purchases. While the Publishing Affiliate and Tradezy RIA have taken steps to try to control information leakage, there is no guarantee that such steps will always be successful or that trading based upon such information will necessarily be identified and stopped.

***Market Manipulation Risk.*** Due to the way that client portfolios are managed, it is possible that Traders will be tempted to engage in practices intended to manipulate the securities markets. For example, a Trader could engage in behavior referred to as "front-running," whereby a Trader executes trades in a way designed to benefit from the Trader's knowledge that Tradezy RIA's clients will trade those securities shortly thereafter, affecting the price of the asset. The Publishing Affiliate and Tradezy RIA have implemented measures intended to control for the risk of market manipulation. However, there is no guarantee that such measures will always be successful, that market manipulation will be prevented, or that Tradezy RIA's clients will not be adversely affected by market manipulation.

***Risks Inherent in Computer-Driven and Technological Systems.*** Tradezy relies extensively on a wide range of technological systems, including computer hardware and software systems and telecommunications systems, in all phases of daily operations, including valuation, trade identification and construction, trade execution, and reporting. Such systems are subject to a number of inherent and unpredictable risks. For example, there may be materially adverse undiscovered errors in software programs; costs of procurement of such technology may increase; claims related to intellectual property infringement may be brought against users of technology, including Tradezy; software and/or hardware may malfunction and/or degrade; electronic and telecommunications delivery may fail; security breaches may lead to unauthorized trades or stolen intellectual property; services provided by third-party vendors to support the intellectual property systems may be interrupted; and computer-driven trading errors may occur.

***Portfolio Turnover/Adverse Tax Risk.*** Clients should expect that there will be frequent trading of positions in their accounts with the result that clients should expect that, for tax purposes, they will largely experience short term capital gains and losses, rather than long term gains and losses, i.e., gains and losses on positions held for more than a year, which are generally treated more favorably for tax purposes. Frequently purchasing and selling securities, including conducting the purchase and sale of securities in separate accounts, can affect investment performance, and can result in adverse tax consequences, for example capital gains tax liabilities. **Tradezy RIA**

**does not monitor offsetting transactions across accounts nor does it provide tax advice to its clients. Clients should seek the advice of a professional who can advise them on tax related matters.**

***Suitability Mismatch.*** As Tradezy RIA allows its clients to follow the trading of any Trader, including Traders whose risk “score” does not match the investor classification given to that client, clients may establish securities portfolios that may not be appropriate for their investment objectives. Even where a client establishes a securities portfolio that is initially appropriate for their investment objectives, there is a risk that the securities portfolio becomes unsuitable over time as a result of a Trader changing their trading style or a change in the client’s circumstances. Tradezy RIA intends to mitigate this risk by alerting clients to a potential suitability mismatch at the time they establish a portfolio, and thereafter on an annual basis. In each instance, clients are required to affirmatively acknowledge this risk. Clients should also understand that, even if certain Trader-derived securities portfolios are each suitable for that client, if a client creates multiple such securities portfolios, when taken in aggregate these portfolios may not be suitable for that client, and Tradezy RIA does not screen for this risk.

## **Item 9: Disciplinary Information**

We are required to disclose any material disciplinary history for the company or for any management personnel, such as violations of financial laws, felonies, or consent orders from regulators. At present, there is no such history to disclose.

Visit [Investor.gov/CRS](http://Investor.gov/CRS) for a free and simple search tool to research Tradezy RIA’s disciplinary record. Tradezy RIA’s CRD number is **331777**.

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

Neither we nor any of our management persons are, or plan to be, registered as a broker-dealer, registered representative of a broker-dealer, futures commission merchant, commodity pool operator, or commodity trading advisor. Nor are we or any of our management persons an associated person with any of these entities.

Neither we nor our management persons have material relationships with the following persons that may create a conflict of interest:

1. broker-dealer, municipal securities dealer, or government securities dealer or broker
2. investment company or other pooled investment vehicle (including a mutual fund, closed-end
3. investment company, unit investment trust, private investment company or “hedge fund,” and offshore fund)
4. other investment adviser or financial planner
5. futures commission merchant, commodity pool operator, or commodity trading advisor
6. banking or thrift institution
7. accountant or accounting firm
8. lawyer or law firm
9. insurance company or agency
10. pension consultant

11. real estate broker or dealer
12. sponsor or syndicator of limited partnerships.

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

Pursuant to SEC Rule 204A-1, we have adopted a Code of Ethics to mitigate the risks of a conflict of interest between us and our employees and our clients, such as conflicts based on our knowledge of clients' trading. For example, we are not allowed to "front-run" client trades based on knowledge that a Trader is about to make a given trade in the Trader's designated account.

At times, a Trader may trade in a security that our associated persons may have personal positions in. We do not allow personnel to coordinate with Traders to exploit insider knowledge of their future trades. We also do not allow Traders to trade in thinly-traded stocks that are prone to manipulation.

The full Code of Ethics can be found at [www.tradezyapp.com/code-of-ethics](http://www.tradezyapp.com/code-of-ethics); a hardcopy of the Code of Ethics will be provided to any client or prospective client on request.

### **Item 12: Brokerage Practices**

Our platform uses the API systems of your external brokerage to issue trade orders. We do not control your choice of broker. We will interface with any broker whose API system meets our technical requirements. Note that our copy-trading system does not change its behavior in response to your brokerage's fee policies.

### **Item 13: Review of Accounts**

As your brokerage accounts are hosted by an external broker and managed by an automated copy-trader service, our financial professionals do not periodically review your accounts.

You may access your portfolios through your brokerage. We provide written monthly account statements to you via email with your account holdings, transactions, and investment performance.

### **Item 14: Client Referrals and Other Compensation**

While Tradezy RIA does not do so at this time, Tradezy RIA may from time to time run a referral program pursuant to which, depending on the promotion being operated, existing clients or Traders may be compensated for referring new clients or Traders. Referrers would not be employees, contractors, or agents of Tradezy RIA. If we do run such a referral program, we will amend this Form with the details of the program.

The Publishing Affiliate runs a referral program for recruiting new Traders, in which the referrer can receive a flat fee or a percentage of the Trader's compensation. This is not expected to materially affect clients.

**Item 15: Custody**

We do not have custody of client accounts; your accounts are held by the brokers that you select. We do not and cannot distribute or withdraw funds from your account.

**Item 16: Investment Discretion**

Tradezy RIA has limited discretionary authority to manage client assets. While Tradezy RIA does have authority from clients to submit orders to their brokerages to buy or sell positions, the positions that are the subject of these orders are determined in accordance with the method described at Item 4, above, such that Tradezy RIA's discretion in its selection of the positions to be bought or sold on behalf of clients is limited. Tradezy RIA believes that its relationship with clients is not properly characterized as a separately managed account.

**Item 17: Voting Client Securities**

Tradezy RIA does not have authority to vote securities on behalf of clients and does not provide advice as to how clients should vote.

Tradezy RIA does not advise on, and clients are responsible for, any legal proceedings, including, without limitation, bankruptcies, class actions, or class action settlements, involving securities held or previously held in a client securities portfolio or the issuers of such securities.

**Item 18: Financial Information**

Tradezy RIA does not require or solicit prepayment of fees six months in advance and does not have any financial condition that would impair its ability to meet contractual commitments to clients.

**Item 19: Requirements for State-Registered Advisers**

This item is not applicable to Tradezy RIA.