

ITEM 1. COVER PAGE

PART 2A OF FORM ADV: FIRM BROCHURE

INVESTING ONLINE, LLC

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This brochure provides information about the qualifications and business practices of Investing Online, LLC. (“Investing Online” or the “Firm”), an investment adviser registered with the United States Securities and Exchange Commission (“SEC”). Registration with the SEC does not imply a certain level of skill or training. If you have any questions about the contents of this brochure, please contact the Firm at support@investingonline.com. The information in this brochure has not been approved or verified by the SEC or by any state securities authority.

Additional information about Investing Online is also available on the SEC’s website at www.adviserinfo.sec.gov.

ITEM 2. MATERIAL CHANGES

This Item discussed material changes to this brochure since its last annual update. Investing Online has no changes to disclose in relation to this Item.

Pursuant to the SEC's requirements and rules, you will receive a summary of any material changes to this brochure within one hundred twenty (120) days of the close of the Firm's fiscal year. The brochure may be requested by any investor or prospective investor, free of charge, by contacting the Firm at support@investingonline.com.

ITEM 3. TABLE OF CONTENTS

Item 4. Advisory Business.....	4
Item 5. Fees and Compensation.....	5
Item 6. Performance-Based Fees and Side-By-Side Management.....	5
Item 7. Types of Clients.....	5
Item 8. Method of Analysis, Investment Strategies and Risk Of Loss.....	6
Item 9. Disciplinary Information.....	11
Item 10. Other Financial Industry Activities and Affiliations.....	11
Item 11. Code of Ethics.....	11
Item 12. Brokerage Practices.....	12
Item 13. Review of Accounts.....	13
Item 14. Client Referrals and Other Compensation.....	14
Item 15. Custody.....	14
Item 16. Investment Discretion.....	14
Item 17. Voting Client Securities.....	14
Item 18. Financial Information.....	15

ITEM 4. ADVISORY BUSINESS

Investing Online (“Investing Online” or the “Firm”) is a Delaware limited liability company established in October 2023. The Firm is wholly owned by Clifton Software, Inc. (“Clifton Software”). Information about Clifton Software's ownership is set forth in Schedule B of the Firm's Form ADV Part 1, available at www.adviserinfo.sec.gov.

Investing Online provides an interactive investment platform (the “Platform”) to its clients. The Platform is designed for clients seeking short or medium term cash management portfolios. The Platform is accessible through a website interface.

Investing Online collects information about each client’s preferences, objectives, net-worth, sophistication, and risk tolerance (collectively, a client’s “Investment Needs”) at time of onboarding and from time to time thereafter via a one or more questionnaires made available through the Platform (together, the “Client Profile”). The Firm generates investment recommendations for clients through the Platform, using the Firm’s algorithm(s) (the “Algorithm”) and based on the information provided by clients in their Client Profiles. The Firm does not verify the information it receives from clients in their Client Profile for accuracy, and it will rely on the information clients provide therein. It is each client’s responsibility to promptly update its Client Profile in the event of a change.

Investing Online recommends and manages portfolios containing bonds, exchange traded funds (“ETFs”), and mutual funds. The Firm’s recommendations include the following asset types: treasuries, fixed income (debt) securities, certificates of deposits, and mutual funds and ETFs that invest in the foregoing. Clients may select a portfolio or specific assets based on the Firm’s recommendations, which the Firm implements on a discretionary or non-discretionary basis. Where the Firm has discretionary authority over a client’s portfolio, it implements a recommended model portfolio by buying and selling securities without the client’s prior consent or approval for each transaction, subject to any client-directed limitations as set forth in Item 16. The Firm also offers services on a non-discretionary basis, whereby the Firm implements transactions in recommended securities and/or self-directed transactions with client’s consent and approval for each transaction. The Firm monitors its recommendations on an ongoing basis, and recommends changes, as appropriate, as described in Item 13.

The Firm manages clients’ securities portfolios in securities brokerage accounts (the “Client Accounts”) established by clients at Interactive Brokers LLC (the “Custodian”), an SEC-registered broker-dealer and Financial Industry Regulatory Authority (“FINRA”) member, which provides brokerage related services to the Firm and its clients. The Custodian provides custody, clearing, and settlement services for transactions effected by the Firm in Client Accounts. The investments of each client are held in a separate Client Account in the name of the client, and not with the Firm. Clients open Client Accounts at Custodian via the application program interface in the Platform.

As of the date of this Brochure, the Firm does not have assets under management.

ITEM 5. FEES AND COMPENSATION

Investing Online charges clients a monthly fee. For clients with \$1,200 or less in assets in their Client Accounts, the Firm charges a fixed fee of \$1 per month, which is assessed on the last day of each month. For clients with more than \$1,200 in their Client Accounts, the Firm charges an annual asset-based fee of one percent (1%), which is prorated and charged based on the average daily balance of their Client Accounts. In the event of termination, clients with \$1,200 or less in their Client Accounts are charged the fixed fee set forth above for the current month of service. Clients with \$1,200 or more are charged a prorated asset-based fee, calculated as of the date of termination. The Firm may offer or negotiate to charge certain clients a lesser fee or exclude certain assets or asset classes from the fee at its sole discretion. The Firm's agreements and the client's separate agreement with the Custodian generally authorize the Firm to debit Client Accounts for the amount of the fee and to directly remit the fee to the Firm.

Clients will incur brokerage and other transaction costs in addition to the fees they pay to Investing Online. Investing Online does not charge these to clients and does not benefit directly or indirectly from any such charges. These types of charges include, but are not limited to, wire transfer fees, paper statement fees, and bounced check fees. The issuer of some of the securities purchased for clients, such as mutual funds and ETFs, may charge product fees and expenses that affect clients. For example, 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. For additional information about the Firm's recommendation of broker-dealers for Client Accounts, see Item 12 of this brochure.

Clients may withdraw assets from Client Accounts at any time, subject to the usual and customary securities settlement procedures. However, the withdrawal of assets may impair the achievement of a client's investment objectives. Clients are advised that when cash is withdrawn, they may be subject to transaction fees, and/or tax ramifications. In the event of a withdrawal by the client, the Firm may retain sufficient assets in the Client Account to cover the anticipated fee for the current billing period.

ITEM 6. PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

Investing Online does not charge performance-based fees.

ITEM 7. TYPES OF CLIENTS

The Firm generally provides investment advice to the following types of clients: individuals, high-net worth individuals, and entities (such as corporations and limited liability companies).

The Firm does not impose requirements for opening or maintaining a Client Account, such as a minimum account size.

ITEM 8. METHOD OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

Investment Strategies and Methods of Analysis

As set forth above, Investing Online employs the Algorithm to recommend portfolios containing treasuries, fixed income (debt) securities, certificates of deposits, and mutual funds and ETFs that invest in the foregoing based on the information provided by clients in their Client Profiles.

Investing Online currently offers one or more models that seek to optimize yield and liquidity by allocating among the above-mentioned securities. The strategies employed by the models are not generally meant to be long-term in nature, and are aimed at achieving short-term and medium-term client objectives on risk-adjusted returns.

Risk of Loss

Investing in securities involves risk of loss that clients should be prepared to bear. Investing Online cannot guarantee any level of performance or that clients will not incur a loss of capital.

Securities portfolios recommended by the Firm will not be fully diversified. As such, securities portfolios recommended by the Firm may not follow general movements in the market. The Firm does not provide comprehensive financial or tax planning or legal advice, and clients are advised and afforded the opportunity to seek the advice and counsel of the client's own tax, financial, and legal advisers. The Firm's Services are not a complete investment program and clients should not use them as the sole component of their investment plan. Clients must understand that investments made via the Platform involve substantial risk and are subject to various market, currency, economic, political, and business risks, and that those investment decisions and actions will not always be profitable. Clients may lose some or all of the amount invested.

The following risks are not meant to be all inclusive, but should be considered prior to engaging Investing Online for its advisory services.

Market Risk

The price of a security, mutual fund, exchange-traded fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, macroeconomic environment, unpredictable market sentiment, forecasted or unforeseen economic developments, interest rates, regulatory changes, and domestic or foreign political, demographic, or social events. If a client has a high allocation in a particular asset/class, it may negatively affect overall performance to the extent that the asset/class underperforms relative to other market assets. Conversely, a low allocation to a particular asset class that outperforms other asset/classes in a particular period may cause that client's portfolio to underperform relative to the overall market.

Investment Risk

There is no guarantee that Investing Online's judgment or investment decisions about particular securities and asset classes will necessarily produce the intended results. Such judgment may prove to be incorrect, and a client might not achieve its investment objectives. In addition, it is possible that clients or Investing Online itself may experience computer equipment failure, loss of internet access, viruses, or other events that may impair access to Investing Online's software based financial service.

Volatility and Correlation Risk

Clients should be aware that the Firm's asset selection process may be based in part on a careful evaluation of past price performance and volatility to evaluate future probabilities. However, it is possible that different or unrelated asset/classes may exhibit similar price changes in similar directions which may adversely affect a client and may become more acute in times of market upheaval or high volatility. Past performance is no guarantee of future results, and any historical returns, expected returns, or probability projections may not reflect actual future performance.

Mutual Fund and ETF Risks

An investment in a mutual fund or ETF involves risk, including the loss of principal. Mutual fund and ETF shareholders are necessarily subject to the risks stemming from the individual issuers of the fund's underlying portfolio securities. Such shareholders are also liable for taxes on any fund-level capital gains, as mutual funds and ETFs are required by law to distribute capital gains in the event they sell securities for a profit that cannot be offset by a corresponding loss. Shares of mutual funds are generally distributed and redeemed on an ongoing basis by the fund itself or a broker acting on its behalf. The trading price at which a share is transacted is equal to a fund's stated daily per share net asset value ("NAV"), plus any shareholders fees (e.g., sales loads, purchase fees, redemption fees). The per share NAV of a mutual fund is calculated at the end of each business day, although the actual NAV fluctuates with intraday changes to the market value of the fund's holdings. The trading prices of a mutual fund's shares may differ significantly from the NAV during periods of market volatility, which may, among other factors, lead to the mutual fund's shares trading at a premium or discount to NAV. Shares of ETFs are listed on securities exchanges and transacted at negotiated prices in the secondary market. Generally, ETF shares trade at or near their most recent NAV, which is generally calculated at least once daily for indexed-based ETFs and more frequently for actively-managed ETFs. However, certain inefficiencies may cause the shares to trade at a premium or discount to their pro rata NAV. There is also no guarantee that an active secondary market for such shares will develop or continue to exist. Generally, an ETF only redeems shares when aggregated as creation units (usually 50,000 shares or more). Therefore, if a liquid secondary market ceases to exist for shares of a particular ETF, a shareholder may have no way to dispose of such shares.

Reliance on Management and Other Third Parties

Mutual fund and ETF investments will rely on third-party management and advisers. Investing Online will not have an active role in the day-to-day management of such investments. Carried interest and other incentive distributions to fund management may create an incentive towards more speculative investments than would otherwise have been made.

Fixed Income Securities Risk

Fixed income securities are subject to the risk of the issuer's or a guarantor's inability to meet principal and interest payments on its obligations, price volatility, interest rate risks, credit risks, and market risks. These risks could reduce the yield that an investor receives from its portfolio. These risks can occur from fluctuations in interest rates, a change to an issuer's individual condition or industry, or events in financial markets.

US Treasury Bills Risk

U.S. Treasury Bills ("T-Bills") are generally considered low-risk investments due to their backing by the U.S. government. However, they are not entirely free of risk. T-Bills, while short-term in nature, can be sensitive to changes in interest rates. A rise in interest rates may cause the market value of T-Bills to decline if they need to be sold prior to maturity. T-Bills offer fixed returns that may not keep pace with inflation over time. Consequently, investors may experience a decrease in purchasing power if the return on T-Bills does not outpace inflation. Upon maturity, investors may be faced with the challenge of reinvesting the principal at lower interest rates, particularly in a declining interest rate environment. Although T-Bills are highly liquid under normal market conditions, periods of market disruption or limited market activity could make it more difficult to sell T-Bills at a desired price. Despite being backed by the U.S. government, T-Bills are not completely without credit risk. Any changes to the credit rating or perceived stability of the U.S. government could impact T-Bill values.

Certificates of Deposit

Certificates of Deposit ("CDs") are generally considered low-risk investments, typically offering fixed interest rates and being insured by the Federal Deposit Insurance Corporation ("FDIC") up to applicable limits. CDs have fixed interest rates, which means their return may not keep pace if market interest rates rise. Investors may miss out on potential higher yields available from other investments during the CD's fixed term. The fixed interest rates on CDs may not keep up with inflation, potentially resulting in a decrease in the investor's purchasing power over time. CDs typically have a fixed term, ranging from a few months to several years. Withdrawing funds before the maturity date can result in penalties, reducing the overall return on the investment. Therefore, investors should be prepared to hold CDs until maturity. Upon maturity, investors may need to reinvest the principal at potentially lower interest rates if market rates have declined, impacting future income. While CDs issued by FDIC-insured banks are covered up to the applicable limits, amounts exceeding FDIC coverage or CDs issued by non-insured institutions carry a credit risk. Investors could potentially lose a portion of their principal in the event of the issuing institution's insolvency.

Legislative and Tax Risk

Performance may directly or indirectly be affected by government legislation or regulation, which may include, but is not limited to changes in investment adviser or securities trading regulation; change in the U.S. government's guarantee of ultimate payment of principal and interest on certain government securities and changes in the tax code that could affect interest income, income characterization, and/or tax reporting obligations.

Inflation, Currency, and Interest Rate Risks

Security prices and portfolio returns will likely vary in response to changes in inflation and interest rates. Inflation causes the value of future dollars to be worth less and may reduce the purchasing power of an investor's future interest payments and principal. Inflation also generally leads to higher interest rates, which in turn may cause the value of many types of fixed income investments to decline. The liquidity and trading value of foreign currencies could be affected by global economic factors, such as inflation, interest rate levels, and trade balances among countries, as well as the actions of sovereign governments and central banks. In addition, the relative value of the U.S. dollar-denominated assets managed by clients may be affected by the risk that currency devaluations affect their purchasing power.

Automated Investing

Investing Online relies on the Client Profile, which is based on one or more static questionnaires consisting of a limited number of questions that form the sole basis for its recommendations to clients. Such questionnaires are very limited in nature. The questions may not, or may not accurately, capture an individual client's Investment Needs. Although clients may change and update their responses to their Client Profile, Investing Online does not make investment advisory personnel available to clients to highlight and explain important concepts or clarify the details of a specific client's Investment Needs. Online and electronic interactions are limited, compared to face-to-face individual advice.

Operational Risk

Operational risk is the exposure to the chance of loss arising from shortcomings or failures in internal processes or systems of Investing Online, Custodian, or technology service providers, or external events impacting those systems, and human error. A client may suffer a loss arising from shortcomings or failures in internal processes, people, or systems, or from external events. Operational risk can arise from many factors ranging from routine processing errors to potentially costly incidents related to, for example, major systems failures.

Trade errors and other operational mistakes ("Operating Events") occasionally may occur in connection with Investing Online's services with respect to Client Accounts. Investing Online has policies and procedures that address identification and correction of Operating Events. Operating Events may include, but are not limited to, the following: (i) the placement of orders (either purchases or sales) in excess of the amount intended to trade for a Client Account; (ii) the purchase (or sale) of when it should have been sold (or purchased); (iii) a purchase or sale not intended for the Client Account; and (iv) incorrect allocations of trades. Operating Events can also occur in connection with other activities that are undertaken by Investing Online, such as fee calculations, and other matters that are non-advisory in nature.

Investing Online makes its determinations regarding Operating Events pursuant to its policies on a case-by-case basis, in its discretion, based on factors it considers reasonable, including regulatory requirements, contractual obligations, and business practices. Not all Operating Events will be considered compensable mistakes.

Relevant factors Investing Online considers when evaluating whether an Operating Event is compensable include, among others, the nature of the service being provided at the time of the event, specific applicable contractual and legal requirements, and standards of care, whether an applicable investment guideline was contravened, and the nature of the relevant circumstances.

Operating Events may result in gains or losses or could have no financial impact. Clients are entitled to retain any gain resulting from an Operating Event. Operating Events involving erroneous transactions in Client Accounts generally are corrected in accordance with the procedures established by Investing Online's Custodian. When Investing Online determines that reimbursement by Investing Online is appropriate, the Client will be compensated as determined in good faith by Investing Online. Investing Online will determine the amount to be reimbursed, if any, based on what it considers reasonable guidelines regarding these matters in light of all of the facts and circumstances related to the Operating Event. In general, compensation is expected to be limited to direct and actual losses, which may be calculated relative to comparable conforming investments, market factors and benchmarks and with reference to related transactions, and/or other factors Investing Online considers relevant. Compensation generally will not include any amounts or measures that Investing Online determines are speculative or uncertain.

Cybersecurity Risks

Investing Online and its service providers are subject to risks associated with a breach in cybersecurity. Cybersecurity is a generic term used to describe the technology, processes and practices designed to protect networks, systems, computers, programs and data from cyber-attacks and hacking by other computer users, and to avoid the resulting damage and disruption of hardware and software systems, loss, or corruption of data, and/or misappropriation of confidential information. In general, cyberattacks are deliberate, but unintentional events may have similar effects. Cyber-attacks may cause losses to Investing Online's clients by interfering with the processing of transactions, affecting Investing Online's ability to calculate net asset value or impeding or sabotaging trading. Clients may also incur substantial costs as the result of a cybersecurity breach, including those associated with forensic analysis of the origin and scope of the breach, increased, and upgraded cybersecurity, identity theft, unauthorized use of proprietary information, litigation, and the dissemination of confidential and proprietary information. Any such breach could expose Investing Online to civil liability as well as regulatory inquiry and/or action. In addition, clients could be exposed to additional losses as a result of unauthorized use of their personal information. While the Firm has established business continuity plans, incident response plans and systems designed to prevent cyber-attacks, there are inherent limitations in such plans and systems, including the possibility that certain risks have not been identified. Similar types of cybersecurity risks also are present for issuers of securities in which the Firm invests, which could result in material adverse consequences for such issuers and may cause a client's investment in such securities to lose value.

Market Volatility

General economic conditions have an impact on the success of Investing Online's investment strategies. Changing external economic conditions in the U.S. and global economies could have a significant impact on the success of clients' investments. The stability and sustainability of growth in global economies may be impacted by terrorism or acts of war. There can be no

assurance that such markets and economic systems will be available for issuers of securities available via the Platform to operate. Changing economic conditions, thus, could potentially adversely impact the valuation of clients' investments in securities via the Platform.

Catastrophic Event Risks

Investing Online may be subject to the risk of loss arising from direct or indirect exposure to a number of types of catastrophic events, including without limitation: public health crises, including any outbreak of novel coronavirus, SARS, H1N1/09 influenza, avian influenza, other coronavirus, Ebola or other existing or new epidemic diseases, or the threat thereof; or other major events or disruptions, such as hurricanes, earthquakes, tornadoes, fires, flooding and other natural disasters; acts of war or terrorism, including cyberterrorism; or major or prolonged power outages or network interruptions. The extent of the impact of any such catastrophe or other emergency on Investing Online and/or a client's operational and financial performance and each client's investments will depend on many factors, including the duration and scope of such emergency, the extent of any related travel advisories and restrictions, the impact on overall supply and demand, goods and services, investor liquidity, consumer confidence and levels of economic activity, and the extent of its disruption to important global, regional and local supply chains and economic markets, all of which are highly uncertain and cannot be predicted. In particular, to the extent that any such event occurs and has a material effect on global financial markets or specific markets in which a client participates (or has a material effect on any locations in which Investing Online operates or on any of its personnel) the risks of loss could be substantial and could have a material adverse effect on clients or the ability of Investing Online to fulfill its investment objectives on behalf of its clients.

Limitations of Disclosure

The foregoing list of risks does not purport to be a complete enumeration or explanation of the risks involved in investing in investments. As investment strategies develop and change over time, clients may be subject to additional and different risk factors. No assurance can be made that profits will be achieved or that substantial losses will not be incurred.

ITEM 9. DISCIPLINARY INFORMATION

There are no legal or disciplinary events that are material to a client's evaluation of Investing Online or the integrity of the Firm's management or any employee of the Firm.

ITEM 10. OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

There are no financial industry affiliations involving the Firm or its management persons requiring disclosure pursuant to this Item.

ITEM 11. CODE OF ETHICS

Investing Online's employees are prohibited from investing in the same securities that are held by and/or recommended to clients in personal broker accounts held outside the Firm. Investing Online employees are eligible to hold accounts with Investing Online and invest alongside clients. As such, Investing Online has adopted a Code of Ethics that sets forth the standards of conduct expected of employees. All employees including management are required to comply with the provisions of the Code of Ethics. The Code of Ethics includes policies and procedures relating to personal trading, gifts and entertainment involving business associates, outside activities, charitable donations as well as other potential or actual conflicts of interest. All employees and officers must acknowledge receipt of the Code of Ethics and report any violations of the Code to the Chief Compliance Officer.

In addition, the Code of Ethics requires all employees including management to comply with certain rules designed to protect against insider trading. Pursuant to the Code of Ethics, upon commencement of employment, Investing Online's employees who are designated as Access Persons are required to provide an initial holdings report disclosing all personal brokerage accounts, private placements, and investments of limited opportunity (e.g. "hedge funds"). In addition, employees must thereafter provide a personal trading report to the Compliance department within 30 days after the end of each calendar quarter. This report must include every securities transaction (excluding transactions effected in any account over which neither Investing Online nor the employee has any direct influence or control, and transactions in securities that are direct obligations of the Government of the United States, bankers' acceptances, bank certificates of deposit, commercial paper, and high quality short-term debt instruments, including repurchase agreements, or shares issued by registered open-end investment companies) in which the employee, the employee's immediate family or trusts of which the employee is a trustee or in which the employee has a beneficial interest have participated during the quarter.

Certain personal trades must be pre-cleared by the Chief Compliance Officer, including investments in private placements and initial public offerings, as referenced above, and such pre-clearance will apply to initial public offerings and private placements, as further described in Investing Online's Code of Ethics. Each employee is also required to provide an annual report of brokerage accounts and holdings along with an acknowledgement at least annually that the employee will comply with the provisions of the Code of Ethics.

Investing Online's related persons may from time to time invest in or receive services from registered advisors on the Investing Online platform. If so, prior to making such investment or any withdrawal, a related person is required to disclose his or her intent to make such investment or withdrawal, as applicable, to Investing Online's Chief Compliance Officer for review and approval as provided for in Investing Online's Code of Ethics.

Investing Online is required to keep copies of the Code of Ethics and all records relating thereto. Clients or prospective clients may obtain a copy of the Code of Ethics upon written request using the address on the front page of this Brochure.

ITEM 12. BROKERAGE PRACTICES

Investing Online utilizes the Custodian to maintain custody of client assets. As set forth in Item 4, the Custodian provides custody, clearing, and settlement services for transactions effected by the Firm in Client Accounts.

Best Execution – Selection Factors for Broker / Dealers

In recommending a broker-dealer for Client Accounts, Investing Online has a duty to seek best execution of transactions. “Best execution” is generally understood to mean the most favorable cost or net proceeds reasonably obtainable under the circumstances. In recommending a broker-dealer such as the Custodian, Investing Online consider a number of factors, including transaction price, quality of execution (e.g., the speed of execution, the likelihood the trade will be executed, etc.), other valuable services provided by the broker-dealer, the broker/dealer’s financial soundness, the broker/dealer’s ability to commit capital; the broker/dealer’s ability to timely and accurately communicate with Investing Online; the number of shares being purchased or sold; and similar factors. Investing Online does not consider any client referrals from a broker/dealer when determining best execution, or when placing client trades.

Investing Online is not obligated to recommend the broker/dealer offering the lowest available commission rate if, in Investing Online’s reasonable judgment, the total cost or proceeds from the transaction may be less favorable than what may be obtained elsewhere or if a higher commission is justified by the service and/or research provided by another broker/dealer.

Investing Online has implemented a policy to address the conflicts of interest associated with its brokerage practices. To determine that it is receiving best execution for its transactions over time, Investing Online will obtain information as to the general level of commission rates being charged by the brokerage community, from time to time, and may periodically evaluate the overall reasonableness of brokerage commissions paid on client transactions by reference to such data.

Directed Brokerage

Investing Online requires its clients to use the Custodian for Client Accounts and does not accept directed brokerage.

Cross Trades

Investing Online does not engage in cross transactions as a matter of policy.

Soft Dollars

Investing Online does not currently engage in soft dollar arrangements with the Custodian.

Commission Sharing Arrangement

Investing Online does not currently engage in commission-sharing arrangements with the Custodian.

Trade Aggregation and Trade Sequence

Investing Online submits client trades on an account by account basis. Selection will seek to favor best client execution. Accounts are subject to ongoing, randomized algorithmic analysis in order to make appropriate transaction selections for each account.

Initial Public Offerings

Investing Online does not offer investments in Initial Public Offerings to its clients at this time.

Trade Errors

Investing Online has established error correction procedures which provide that the resolution of errors be made in light of the Firm's fiduciary duty and in placing an affected client's interest before that of the Firm. It is Investing Online's policy to resolve any error identified in a client account in a manner that the Firm believes results in no harm to the account.

In resolving trade errors, any net losses require reimbursement from Investing Online. Any net gains will be allocated to the client's account. Where the custodian/broker-dealer is the source of trade errors, Investing Online will seek reimbursement from such custodian/broker-dealer.

Investing Online Employee Investment Eligibility and Activity

Employees are eligible to hold accounts with Investing Online. The Firm maintains a Code of Ethics designed to address conflicts of interest associated with this practice.

ITEM 13. REVIEW OF ACCOUNTS

As set forth in Item 4, the Firm monitors its recommendations on an ongoing basis, and recommends changes, as appropriate. Investing Online performs such monitoring using software-based algorithms. In circumstances where Investing Online has identified a discrepancy, an Investing Online employee will review such discrepancies and determine necessary remediation, as necessary. Clients are responsible for updating their Client Profile information, upon which updated recommendations are made. The Firm facilitates an annual review process for such information.

Investing Online currently provides information about clients' holdings and transactions through the Platform. In addition, the Custodian provides clients statements to clients for their Client Accounts on at least a quarterly basis, as described in Item 15. Clients should compare the account statements they receive from the Custodian to the information provided by the Firm via the Platform.

ITEM 14. CLIENT REFERRALS AND OTHER COMPENSATION

Investing Online does not receive economic benefits from third-parties for providing investment recommendations for client referrals.

Investing Online pays third-party solicitors fixed fees or asset-based fees for referring prospective clients to the Firm. Where prospective clients are referred to the Firm by such third-party solicitors, they will receive disclosure regarding such arrangements, including a description of the compensation paid by the Firm. Unless otherwise disclosed, any such referral fees are paid solely from Investing Online's fees, and do not result in any additional charges to clients.

ITEM 15. CUSTODY

Investing Online is deemed to have custody of client funds and securities based on its authority to deduct its fees from Client Accounts, as set forth in Item 5. As set forth in Item 13, Clients should compare the account statements they receive from the Custodian to the information provided by the Firm via the Platform. Any discrepancies identified by a client should be immediately reported to Investing Online at support@investingonline.com and/or the Custodian.

ITEM 16. INVESTMENT DISCRETION

As set forth in Item 4, above, the Firm accepts both discretionary and non-discretionary authority. Where the Firm has discretionary authority over a client's portfolio, it implements a recommended model portfolio by buying and selling securities without the client's prior consent or approval for each transaction. Clients who have granted the Firm discretionary authority may request reasonable investment restrictions on the Firm's management, which the Firm may accept at its sole discretion. Such restrictions may be requested by emailing the Firm at support@investingonline.com. Where the Firm has non-discretionary authority, it implements recommended securities and self-directed trades with client's consent and approval for each transaction.

ITEM 17. VOTING CLIENT SECURITIES

Investing Online does not have authority to vote securities on behalf of clients.

ITEM 18. FINANCIAL INFORMATION

Investing Online does not require or solicit prepayment of fees from clients and does not have any financial condition that would impair its ability to meet contractual commitments to clients.