

AIML Trading Partners

("AIMLTP")

FORM ADV PART 2A: FIRM BROCHURE

Item 1 – Cover Page

July 25th, 2024

AIML TRADING PARTNERS LLC
43 Main Street
3rd Floor
Cold Spring Harbor, NY 11724
(631)944-5699

This brochure provides information about the qualifications and business practices of AIML TRADING PARTNERS LLC. If you have any questions about the contents of this brochure, please contact us at (631)944-5699 and/or ryangregorycaldwell@gmail.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 AIML TRADING PARTNERS LLC also is available on the SEC's website at www.advisorinfo.sec.gov.

Item 2 – Material Changes

This "Brochure" is the annual Form ADV Part 2A, part of the original formation and disclosure document dated May 23, 2024, and amended as of August 5th, 2024.

The material changes to the original formation and disclosure document as of August 5th, 2024, are as follows:

Item 7 – Types of Clients

Account Minimum and Other Requirements

AIML Trading Partners LLC does not impose any minimum account size, investment amount, or other requirements for retail investors to open or maintain an account or establish a relationship.

Amended:

Client

AIML Trading Partners LLC provides investment advice to a diverse range of clients, including individuals and corporations. Our clients consist of retail clients, accredited investors, and qualified purchasers.

Account Minimum and Other Requirements

AIML Trading Partners LLC does not impose any minimum account size, investment amount, or other requirements for retail investors to open or maintain an account or establish a relationship.

Item 3 – Table of Contents	
Item 1 – Cover Page	1
Item 2 – Material Changes	2
Item 3 – Table of Contents	3
Item 4 – Advisory Business	4
Item 5 – Fees and Compensation	4
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	5-6
Item 9 – Disciplinary Information	6
Item 10 – Other Financial Industry Activities and Affiliations	6
Item 11 – Code of Ethics, Participation, or Interest in Client Transactions and Personal Trading	7-8
Item 12 – Brokerage Practices	8-9
Item 13 – Review of Accounts	9
Item 14 – Client Referrals and Other Compensation	9-10
Item 15 – Custody	10
Item 16 – Investment Discretion	10-11
Item 17 – Voting Client Securities	11-12
Item 18 – Financial Information	12
Item 19 - Requirements for State-Registered Advisors	12

Item 4 – Advisory Business

AIML Trading Partners (AIMLTP) operates as an internal financial advisory and investment management firm, catering to ultra-high-net-worth individuals and their families. We specialize in providing institutional-grade asset allocation modeling, focusing on comprehensive total wealth planning and portfolio management solutions. Our advisory services encompass a wide range of investment instruments, including cash alternatives, fixed income securities, individual stocks, exchange-traded funds (ETFs), mutual funds, hedge funds, and private equity.

Ryan Gregory Caldwell serves as AIMLTP's sole principal and general partner, embodying a commitment to the firm's fiduciary duty. We approach client relationships with thorough fact-finding and discovery processes, emphasizing goals, objectives, and needs. Through meticulous quantitative analysis, we strive to deploy investment portfolios that optimize earning potential while aligning with each client's unique wealth landscape.

Our client-centric approach involves personalized oversight and the flexibility for clients to impose restrictions on their investments. AIMLTP manages client assets on a non-discretionary basis, requiring regular communication and formal verbal approval for all transactions. We maintain consistency in managing both master accounts and client accounts, ensuring uniformity and transparency in our practices. As of May 23rd, 2024, AIMLTP does not currently oversee assets under management for its advisory services.

Item 5 – Fees and Compensation

Upon registration approval, AIMLTP intends to implement an Advisory Fee structure, comprising a 1.50% annualized rate charged monthly to the balance of client accounts on the first of each month. This fee is deducted directly from client accounts and is non-negotiable.

For example:

$$\begin{aligned} &\$5,000,000 \text{ Account Balance} * (1.50\% \text{ Advisory Fee} / 12 \text{ Months}) = \$5,000,000 * \\ &0.00125 = \$6,250 \text{ per month} \end{aligned}$$

In addition to the Advisory Fee, clients may incur additional fees or expenses related to custodian fees, ETF and mutual fund fees, and margin expenses. AIMLTP does not charge direct broker-dealer fees or transaction costs, nor do we accept compensation for the sale of securities or other investment products. Clients are not charged fees in advance and are not entitled to refunds unless approved at the sole discretion of Ryan Gregory Caldwell, typically applied only in cases of a client's net loss of principal.

Item 6 – Performance-Based Fees and Side-By-Side Management

AIMLTP strictly refrains from charging performance-based fees, which are fees calculated based on a share of capital gains or capital appreciation of advisory client funds. As a result, we do not engage in side-by-side management of accounts subject to performance-based fees alongside accounts subject to other fee structures, such as fees based on assets under management.

Instead, AIMLTP offers its services through a transparent fee structure of a percentage of assets under management, consistent with SEC Rule 205(a)(1). This approach ensures alignment with our clients' interests and promotes transparency in our client relationships.

Item 7 – Types of Clients

Client

AIML Trading Partners LLC provides investment advice to a diverse range of clients, including individuals and corporations. Our clients consist of retail clients, accredited investors, and qualified purchasers.

Account Minimum and Other Requirements

AIML Trading Partners LLC does not impose any minimum account size, investment amount, or other requirements for retail investors to open or maintain an account or establish a relationship.

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

AIMLTP employs a meticulous approach to crafting investment portfolios designed to achieve superior risk-adjusted returns tailored to each client's specific needs. Our analysis encompasses a broad range of economic factors, including monetary policy, interest rates, commodity prices, and market trends. This analysis informs our asset allocation decisions and the selection of securities across various asset classes and investment styles.

Investment Strategies

The cornerstone of our investment strategy is asset allocation, which is guided by our economic forecasts and individual client considerations such as risk tolerance, investment horizon, and tax implications. We diversify investments to mitigate risk and maximize potential returns based on each client's unique financial objectives.

Risk of Loss

Investing in securities inherently carries the risk of loss, and all investments involve varying degrees of risk that investors should be prepared to accept. While AIMLTP endeavors to manage risk through thorough analysis and ongoing monitoring, it's essential for clients to understand the potential risks associated with investing:

- Interest-Rate Risk: Fluctuations in interest rates can impact the value of fixed-income securities.
- Market Risk: External factors can cause the prices of securities to fluctuate.
- Inflation Risk: The erosion of purchasing power due to inflation affects investment returns.
- Currency Risk: Foreign investments are subject to exchange rate fluctuations.
- Political and Legislative Risks: Changes in laws and regulations can affect companies' operations and profitability.
- Reinvestment Risk: Future investment proceeds may need to be reinvested at lower returns.
- Business Risk: Industry-specific factors can impact the profitability of companies.
- Liquidity Risk: The ease of converting an investment into cash varies across asset classes.
- Financial Risk: Excessive leverage can increase the risk of financial distress for companies.

It's important for investors to consult with their own financial advisors to determine the suitability of investing with AIMLTP based on their individual circumstances and risk tolerance.

Item 9 – Disciplinary Information

Registered investment advisers such as AIMLTP are required to disclose all material facts regarding any legal or disciplinary event that would be material to a client's or prospective client's evaluation of the Firm or the integrity of its management. AIMLTP has not been subject to any such legal or disciplinary event, and thus has no information to disclose with respect to this Item.

Item 10 – Other Financial Industry Activities and Affiliations

AIMLTP and its management team are not registered as securities broker-dealers, futures commission merchants, commodity pool operators, or commodity trading advisors.

The Firm does not have any affiliation with any related person or entity that is a broker-dealer, investment company, investment advisor, financial planning firm, commodity pool operator, commodity trading adviser, futures commission merchant, banking or thrift institution, accounting firm, law firm, insurance company or agency, pension consultant, real estate broker or dealer, or an entity that creates or packages limited partnerships.

AIMLTP does not receive compensation directly or indirectly from other advisers that creates a material conflict of interest, nor does it have other business relationships with advisers that would create a material conflict of interest.

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

Ethics

AIMLTP has adopted a Code of Ethics, as detailed in this item, to guide the ethical conduct of all related persons, including Ryan Gregory Caldwell. This Code of Ethics serves as the current standard until further review from legal counsel. The Code emphasizes principles such as prioritizing client interests, avoiding conflicts of interest, maintaining confidentiality, and ensuring compliance with regulatory requirements. The Code includes guidelines on:

- Preclearing and reporting securities transactions
- Engaging in outside activities
- Documenting personal relationships for insider trading compliance
- Giving and receiving business-related gifts and entertainment

A copy of the Code of Ethics is available to any client or prospective client upon request.

Participation or Interest in Client Transactions and Personal Trading

AIMLTP and its related persons, including Ryan Gregory Caldwell, may invest in the funds managed by AIMLTP. However, AIMLTP has policies to prevent conflicts of interest, including prohibiting the improper use of confidential or material nonpublic information.

Confidentiality and Insider Trading

Related persons may come into possession of confidential or material nonpublic information about issuers in which AIMLTP or its clients may invest. AIMLTP enforces policies to prevent the misuse of such information, ensuring it is only disclosed to those with a legitimate need to know and not used for personal gain.

Principal Transactions

AIMLTP and its related persons may, on occasion, buy securities from or sell securities to clients, which could create a conflict of interest. AIMLTP does not trade securities on a principal basis with clients. If principal transactions occur, they will comply with Section 206(3) of the Advisors Act, ensuring they are conducted fairly and transparently.

Personal Trading

AIMLTP personnel are permitted to engage in securities transactions for their personal accounts, subject to pre-approval by Ryan Gregory Caldwell. This oversight helps mitigate potential conflicts of interest.

Ethical Oversight

Ryan Gregory Caldwell is responsible for enforcing the Code of Ethics and ensuring that any exceptions to the Code prioritize the interests of AIMLTP's clients above those of AIMLTP's employees, affiliates, and principals. This Code of Ethics will remain in effect until further review and updates from legal counsel.

Item 12 – Brokerage Practices

Selection Criteria

AIMLTP retains full discretion to determine the broker or dealer to be used for each securities transaction for client accounts. We consider various factors in selecting a broker-dealer to execute transactions and determining the reasonableness of their compensation. These factors include:

- Ability to provide liquidity
- Financial stability
- Actual executed price of the security
- Broker's commission rates
- Research and advisory services
- Custodial and other services
- Size and type of the transaction
- Difficulty of execution
- Operational facilities
- Ability to maintain confidentiality
- Capacity to handle block orders and distribution capabilities

In selecting a broker-dealer, we do not have an obligation to seek the lowest available commission cost and do not necessarily solicit competitive bids. AIMLTP does not typically negotiate "execution only" commission rates, which means clients may be paying for

additional services included in the commission rate. We continually evaluate the appropriateness of brokerage commissions.

Soft Dollar Benefits

AIMLTP does not participate in “soft dollar” relationships where commissions from client transactions are used for services other than execution.

Broker-Dealer Relationships

Ryan Gregory Caldwell is responsible for identifying and approving broker-dealers for executing trades. Factors considered include:

- Financial condition
- Record keeping
- Best price execution
- Market and securities knowledge
- Commission structure
- Reputation and integrity

Brokerage for Client Referrals

AIMLTP does not have arrangements to receive client referrals from any broker-dealer or third party. Additionally, AIMLTP does not give or receive economic benefits for referring clients.

Directed Brokerage

AIMLTP does not require clients to execute transactions through a specific broker-dealer. Clients should be aware that directing brokerage may limit AIMLTP’s ability to negotiate commissions, obtain volume discounts, or achieve best execution, possibly resulting in higher transaction costs.

Item 13 – Review of Accounts

Portfolio Reviews

As Chief Executive Officer, Ryan Gregory Caldwell is responsible for the continuous monitoring and review of portfolio data. This includes reviewing specific securities held, adherence to applicable investment guidelines, if any, and the performance of each client account.

The designated broker-dealer provides clients with written reports on a periodic basis that include, among other things, the net asset value or balance of investors' accounts.

Typically, these reports are accessible through a password-protected website. Additionally, clients receive the following regular communications unless otherwise noted:

- Monthly estimated performance review meetings
- Final quarterly performance review meetings
- Investment-related letters provided throughout the year, usually following quarter-end.

Item 14 – Client Referrals and Other Compensation

Referral Compensation

It is AIMLTP’s policy that we do not pay referral fees to independent persons or firms ("Solicitors") for introducing clients to us. AIMLTP does not use solicitors for client referrals and does not currently engage placement agents for placement of interests.

Item 15 – Custody

Broker-Dealer & Custodian

AIML Trading Partners LLC ("AIMLTP") is now on Charles Schwab's Advisor Services platform and has informal arrangements with both Goldman Sachs and Interactive Brokers to establish professional advisor organization accounts at both firms upon registration-status approval with the SEC. AIMLTP does not receive any supplemental research tools, investment strategies, low commissions, fees, or other services from any broker-dealer. Broker-dealers and/or custodians, such as Charles Schwab, Goldman Sachs, and Interactive Brokers, are selected for individual clients based upon the wants and needs of the client.

AIMLTP Custody Policy

Pursuant to Rule 206(4)-2 of the Advisers Act, because the Firm has the authority and ability to debit its fees directly from clients’ accounts, AIMLTP is deemed to have “constructive custody” of accounts in which advisory fees are deducted. In some cases, AIMLTP may also be deemed to have constructive custody over accounts in which a “Standing Letter of Authorization” (SLOA) to direct funds to a third party has been added to the account.

Custody Limitations

Our policy is to not have custody of client assets beyond the “constructive custody” arising from debiting fees or accepting a third-party SLOA that meets all the conditions in SEC No-Action Letter 2/21/17.

Mitigating Conflicts of Interest

To mitigate any potential conflicts of interests, all client assets are maintained with an independent qualified custodian. Furthermore, clients will receive statements on at least a quarterly basis directly from the qualified custodian that holds and maintains their assets. Clients are urged to carefully review all custodial statements and compare them to the quarterly statements provided by AIMLTP. AIMLTP’s statements may vary slightly from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Standing Letter of Authorization (SLOA)

AIMLTP does not accept “Standing (SLOA)” authorization from clients to disburse funds to third parties unless the SLOA meets all the conditions in SEC No-Action Letter 2/21/17), specifically that the SLOA does not allow AIMLTP to designate or change the identity, address or any other information about the third party.

Item 16 – Investment Discretion

Investment Authority

Non-Discretionary Authority Unless otherwise agreed upon at the inception of the client relationship and memorialized in writing, all Investment Management Services rendered by AIMLTP are conducted on a non-discretionary basis. This means that AIMLTP will not have the authority to make investment decisions without explicit consent from the client for each transaction.

Client Instructions

Clients retain full control over their investment decisions and must provide explicit instructions to AIMLTP for each transaction within their account. AIMLTP will execute trades and transactions only in accordance with these specific instructions provided by the client.

Limited Authority

By signing AIMLTP’s Client Agreement, clients authorize AIMLTP to execute investment transactions in accordance with the explicit instructions provided by the client for the client’s account (excluding any assets or accounts that are designated as “Unmanaged”

per client direction). Pursuant to such agreement, AIMLTP is designated to act as the client's agent solely for the purpose of executing investment transactions as instructed by the client.

Client Responsibility

Clients acknowledge that they are solely responsible for the suitability of investment decisions made within their account. AIMLTP will execute transactions strictly based on the instructions provided by the client and will not assess the suitability of these investments in relation to the client's investment objectives.

Communication of Instructions

Clients must communicate all investment instructions to AIMLTP in writing or through other agreed-upon communication channels as outlined in the Client Agreement. AIMLTP will execute transactions only upon receipt of clear and unambiguous instructions from the client.

Item 17 – Voting Client Securities

AIMLTP Proxy Voting Policy

AIMLTP's policy and practice is to not vote proxies on behalf of its clients and therefore, AIMLTP shall have no obligation to take any action or render any advice with respect to the voting of proxies solicited by or with respect to issuers of securities held in a clients' account. Consequently, clients retain the responsibility for receiving and voting all proxies for securities held within the client's account.

Client Proxy Voting Responsibility

While AIMLTP employees may answer client questions regarding proxy voting matters to assist the client in determining how to vote the proxy, the financial decision of how to vote the proxy rests with the client. AIMLTP shall not be deemed to have proxy voting authority solely because of providing advice or information about a particular proxy vote to a client.

Item 18 – Financial Information

AIMLTP Financial Information

AIMLTP does not require or solicit prepayments of fees in advance. Furthermore, AIMLTP does not have any financial commitments that may impair its ability to meet contractual

and/or fiduciary obligations to clients. Finally, AIMLTP has not been the subject of a bankruptcy proceeding.

Item 19 – Requirements for State-Registered Advisors

AIMLTP Principal Executive Officer Background

In delineating the educational and professional trajectory of Ryan Gregory Caldwell, principal executive officer and general partner of AIMLTP, it is notable that he earned a Bachelor of Science in Business Administration with a concentration in Finance from Long Island University. During his time at LIU, Ryan attained the Academic Achievement in Financial Excellence award and graduated Summa Cum Laude. Furthermore, during his nearly six years tenure as a Financial Advisor at Morgan Stanley Wealth Management, Ryan expertly managed over \$100 million in assets-under-management and achieved the esteemed designation of becoming a 'Pacesetter's Club Member since 2022'.