



ITEM 1 - COVER PAGE

GEN INVEST LLC FORM ADV PART 2A BROCHURE

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GEN INVEST LLC

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This Brochure provides information about the qualifications and business practices of Gen Invest LLC. If you have any questions about the contents of this Brochure, please contact us at 281-744-0716 or contact@genfinancial.co. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or any state securities authority.

Additional information about Gen Invest LLC is also available on the SEC's website at www.adviserinfo.sec.gov.



ITEM 2- MATERIAL CHANGES

Not Applicable. Gen Invest LLC is a new firm, and this is the first edition of the ADV Part 2A form.

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ITEM 4 - ADVISORY BUSINESS

- A. Gen Invest LLC is an investment company founded in August 2024 to provide investment advice to its clients exclusively through our operational website, <https://www.gencapita.com>. The website will be available on multiple platforms, including web-based and mobile applications ("the Application" or "Gen Capita").

It is a wholly-owned subsidiary of Gen Financial Inc., a privately held Delaware corporation owned by Ayodele Allu.

- B. Gen Invest LLC offers its clients services to help them build wealth according to their needs and objectives. The selection of the services provided by Gen Invest LLC includes:

- i. Gen Invest LLC offers non-discretionary asset management services to clients using proprietary algorithm-based technology, accessible through a web-based platform and mobile application ("Gen Capita," the "Application," the Platform")
- ii. We will collect investment information from clients through an online questionnaire on the Platform, including, but not limited to, their financial situation and risk tolerance. This information will help us determine their investment needs and objectives.
- iii. Gen Invest LLC will identify, evaluate, engage, and continuously monitor broker-dealers appropriate to meet the client's goals. We have not appointed any broker-dealers at this time.
- iv. Provide automated tools, such as market updates, stock screeners, heatmaps, and watchlists, to help clients make the best investment decisions.
- v. Provide rebalancing recommendations, which the client can accept, and instruct Gen Invest LLC to execute on their behalf.
- vi. Provide clients with their account performance online.
- vii. Access to third-party platforms and strategies will be available through the Gen Capita.

- C. We do not participate in any wrap fees program.



D. We do not manage client assets.

ITEM 5 - FEES AND COMPENSATION

A. Our fees are disclosed to the client before entering any advisory contract and confirming securities trades on Gen Capita. Below is our fee schedule:

S/n	Fee	Amount
1	Monthly Access Fees	\$2.00
2	Trading Commissions	1% of trade value or \$1.00 per share for securities less than or equal to \$1.00 per share

B. All fees will be deducted from the client's cash position on the Gen Capita.

C. The client will not be charged any other fees. However, they will be required to deposit \$50.00, which will be paid back when the client chooses to close their account on the Gen Capita.

D. Monthly Access Fees are paid monthly in advance. If the client terminates the advisory contract, the outstanding fees for the period will be refunded to the client.

E. Gen Invest LLC will accept compensation in Trading Commissions for selling and purchasing securities and other investment securities. Please see further disclosure below:

1. Conflict of Interest Due to Compensation: We or our supervised persons may receive compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds. This practice presents a conflict of interest, as it incentivizes recommending investment products based on the compensation received rather than on a client's needs.

To address these conflicts, we adhere to a strict code of ethics and implement procedures to ensure that all recommendations are made in the best interests of our clients. We disclose all material conflicts of interest to clients, and our policies require that we provide transparent information regarding compensation. Additionally, if we



primarily recommend mutual funds, we may recommend “no-load” funds, which do not have sales charges.

2. Client's Options: clients can purchase investment products that we recommend through other brokers or agents that are not affiliated with us.
3. Revenue from Commissions and Compensation: More than 50% of our revenue from advisory clients may result from commissions and other compensation for the sale of investment products we recommend, including asset-based distribution fees from the sale of mutual funds; commissions may provide our primary or exclusive compensation.
4. We do not charge any advisory fees.

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

We do not charge performance-based fees.

ITEM 7 - TYPES OF CLIENTS

Our clients include individuals, businesses, and investment companies. Clients are required to deposit and maintain at least \$50 in their accounts.

ITEM 8 - METHODS OF ANALYSIS, INVESTMENT STRATEGIES, AND RISK OF LOSS

A. Method of Analysis, Investment Strategies,

1. Method of Analysis: Gen Invest offers investment advice through Gen Capita, using proprietary algorithms that evaluate client risk profiles, investment objectives, and other relevant information to create and recommend model portfolios aligned with specific risk levels. These portfolios are based on target asset allocations across equities, fixed income, and funds. Our algorithms continuously monitor client



portfolios and will periodically recommend rebalancing when they deviate from the ranges set and approved by the client.

2. Investment Strategies: At Gen Invest, we carefully consider each client's individual circumstances, needs, and objectives when recommending investments. Our investment strategies and algorithms are designed to align with these factors and may include:
 1. Long-Term Growth: Focuses on investing in assets expected to appreciate significantly over time, aiming for capital appreciation.
 2. Income Generation: Targets investments that provide regular income through dividends, interest, or other forms of cash flow.
 3. Diversification: Spreads investments across various asset classes, sectors, and geographies to reduce overall risk.
 4. Active Management: Involves frequently buying and selling investments to take advantage of market opportunities and manage risk.
 5. Passive Management: Utilizes strategies such as indexing to match the performance of a specific market index, typically involving lower costs and less frequent trading.

B. The risks involved include:

1. Artificial Intelligence Risks: Potential inaccuracies or limitations in AI-driven analysis and decision-making.
2. Market Risks: Fluctuations that can lead to losses influenced by economic, political, or social events.
3. Security Selection Risk: Individual securities may underperform relative to expectations.
4. Stock Investment Risks: Risks specific to stock investments, such as company performance or sector downturns.
5. Inflation Risks: Inflation's potential to erode investment returns' purchasing power.
6. Liquidity Risks: The possibility that investments cannot be sold quickly at a fair price.
7. Cybersecurity Risks: Risks associated with cyber threats that could impact the security of investment data and transactions.



Clients should be prepared for these risks and understand that no investment strategy can guarantee profits or protect against losses.

- C. We do not recommend any specific investment strategy since each client has different circumstances, goals, and risk tolerance.

ITEM 9 - DISCIPLINARY INFORMATION

We have not received any client complaints nor been subject to any legal or disciplinary actions by any supervisory, civil, or criminal authority.

ITEM 10 - OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

- A. Gen Invest LLC or its management person is not registered or has an application pending to register as a broker-dealer or a registered broker-dealer representative.
- B. We do not have any other relationship arrangements that would cause material conflicts of interest for our clients, and we do not recommend or select other advisors for clients.

ITEM 11 - CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

- A. Gen Invest LLC has implemented a Code of Ethics that reflects our commitment to ethical conduct. This Code outlines our fiduciary duties and responsibilities to clients and sets guidelines for monitoring the personal securities transactions of employees with access to client information. It also mandates compliance with securities laws, addresses the prevention of insider trading, and specifies disciplinary actions for any violations. A complete copy of the Code of Ethics is available to any client upon request.



ITEM 12 - BROKERAGE PRACTICES

A. Broker Selection: To open an account with Gen Invest LLC, clients must establish a custody account with a broker-dealer registered with the SEC. We select brokers primarily based on the following criteria:

- i. SEC registration and membership with FINRA and SIPC
 - ii. Competitive commission rates
 - iii. Historical performance
 - iv. Quality of trade execution
 - v. Availability of soft dollar arrangements.
1. Research and Other Soft Dollar Benefits: Gen Invest LLC does not receive research or other products or services from a broker-dealer or third party (also known as "soft-dollar benefits") concerning client securities transactions.
 2. Brokerage for client Referrals: Gen Invest LLC does not consider client referrals from a broker-dealer when selecting or recommending broker-dealers.
 3. Directed Brokerage: Gen Invest LLC does not accept requests for directed brokerage arrangements from clients.

B. Gen Invest LLC combines orders for multiple client accounts trading in the same securities at roughly the same time when it is in the best interest of all clients and operationally feasible. Clients participating in an aggregated transaction will receive the average share price achieved for that combined order.

ITEM 13 - REVIEW OF ACCOUNTS

- A. Gen Invest LLC provides its clients with real-time access to their investment account information through an online platform, also known as Gen Capita or the Application ("App").
- B. Our algorithms periodically review client accounts to ensure their portfolios align with Gen Invest LLC's model risk level allocations. If a portfolio drifts outside the designated tolerance thresholds, we notify the client and



recommend rebalancing to the target allocation. Our algorithms determine the timing of these transactions. While these accounts are monitored algorithmically, clients should note that they are generally not actively overseen by investment advisory staff.

- C. Clients have access to their account statements and other related information. These statements can be viewed online for specific periods and downloaded anytime every month.

ITEM 14 - CLIENT REFERRALS AND OTHER COMPENSATION

- A. Gen Invest LLC may benefit from financial institutions for providing clients advice or other advisory services. This type of relationship poses a conflict of interest and is further disclosed in response to Item 12 above.
- B. Gen Invest LLC may occasionally establish referral agreements with unaffiliated third-party promoters who refer prospective clients with investment goals aligned with our approach. We may compensate these promoters directly or indirectly, in compliance with Rule 206(4)-1 of the Investment Advisers Act of 1940 and any applicable state securities laws.

At the time of solicitation, prospective clients will receive disclosures indicating whether the promoter is a current client of the firm, whether they will receive any cash or non-cash compensation for the referral, and acknowledging that such compensation creates a conflict of interest.

Currently, Gen Invest LLC has not entered into any such agreements.

ITEM 15 - CUSTODY

client assets are held in an account at the Custodian. Clients will receive account statements directly from the Custodian at least quarterly and may also receive additional statements from Gen Invest LLC. These statements will detail the account balance, transaction history, and any fees deducted, including Gen Invest LLC's Monthly Access Fees. Clients authorize Gen Invest LLC to facilitate the account opening with the Custodian and deduct fees from their accounts. As we have the authority to deduct fees directly from client accounts, Gen Invest LLC is considered to have custody of client assets.



We recommend that clients review their custodial account statements promptly upon receipt to ensure the accuracy of the information provided.

ITEM 16 - INVESTMENT DISCRETION

Gen Invest LLC offers discretionary and non-discretionary accounts.

Discretionary Investment Advisory Services: We can buy and sell securities in the client accounts on their behalf without prior approval.

Non-discretionary Investment Advisory Services: We will advise the client on whether to buy and sell securities in their account.

ITEM 17 - VOTING CLIENT SECURITIES

Clients delegate proxy voting authority to Gen Invest LLC, which has established Proxy Voting Policies and Procedures ("Proxy Policies") to ensure proxies are voted in clients' best interests.

Gen Invest LLC will use Institutional Shareholder Services Inc. ("ISS") for proxy voting and will generally follow ISS's recommendations. While we may consult clients on critical issues and consider poll results, we retain the final authority and may vote contrary to poll results if deemed appropriate. We will vote only on proxies related to securities held in client accounts. If abstaining from voting is considered in clients' best interest or if a conflict of interest arises, we will follow the Proxy Policies and abstain as necessary.

Our Proxy Policies are designed to address and mitigate potential conflicts of interest. We assess any material conflicts between our interests and those of our clients, reviewing relationships with issuers to identify any financial, business, or personal connections. In a material conflict, we will determine if disclosure to clients is appropriate and maintain records of resolving such conflicts.

Clients can email contact@genfinancial.co to request information on how their proxies were voted on and obtain a copy of our Proxy Policies, which are updated periodically.

Gen Invest LLC does not provide advisory services or take action on behalf of clients in legal proceedings, including bankruptcies or class actions involving securities in client accounts.



ITEM 18 - FINANCIAL INFORMATION

Gen Invest LLC has no financial obligations that would impair its ability to fulfill its contractual and fiduciary duties to clients.

We are not required to provide a balance sheet because we do not collect fees of more than \$1,200 per client more than six months in advance.