



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. **Description of the Advisory Firm.** Gen Invest LLC (or 'Gen Invest') is a Delaware Limited Liability Company formed in August 2024. It is a wholly-owned subsidiary of Gen Financial Inc.
- B. **Types of Advisory Services.** Gen Invest provides investment advice to its clients exclusively through an operational interactive website accessible at <https://www.gencapita.com>, available on the website and as a mobile application. Our services include:
- i. **Algorithmic-based Technology:** We will use algorithmic-based technology to provide discretionary and non-discretionary portfolio management services exclusively through our operational interactive website on the website and mobile application.
 - ii. Gen Invest's discretionary portfolio management includes the discretion to buy and sell securities on behalf of its clients. No minimum balance is required to start or maintain a discretionary account, and we will continue to monitor the client's portfolio on an ongoing basis. Gen Invest may buy or sell securities on behalf of clients in line with the client's unique needs and circumstances, including financial goals, age, risk tolerance, income, and current assets.
 - iii. Under the non-discretionary portfolio management, Gen Invest will seek client approval before executing any transactions on behalf of the client. The client may decline such advice to buy or sell a security. Gen Invest's recommendation will align with the client's needs and circumstances, including financial goals, age, risk tolerance, income, and current assets.
 - iv. Gen Invest limits its investment advice to equities, fixed income securities, ETFs, and non-U.S. securities.
- C. **Tailored Services and Clients' Authority to Restrict.** Gen Invest's proprietary algorithm provides investment advice and portfolio management services tailored to each client's unique profile, which includes the client's financial goals, age, risk tolerance, income, and current assets.

Clients may impose restrictions on the investments in their accounts, such as environmental, social, or governance-related restrictions or individual



security restrictions, which may be provided at account opening or at any time after that at no additional cost.

- D. **Wrap Fee Programs.** We do not participate in any wrap fees program.
- E. **Asset Under Management.** Our assets under management as of October 2024 are as follows:

Discretionary Accounts: \$0.00

Non-discretionary Accounts: \$0.00

ITEM 5 - FEES AND COMPENSATION

A. Fees Schedule.

Discretionary and Non-discretionary Portfolio Management Service Fees:

S/n	Fee	Amount
1.	Account Balances of \$3,000.00 or more	1% per annum
2.	Account Balances below \$3,000.00	\$1 per month

Gen Invest will charge \$1.00 per month in advance for accounts below \$3,000.00. Accounts with \$3,000.000 or more will be charged 1% per annum, divided equally into 12 monthly bills, and charged in arrears. Gen Invest uses the daily average value of the account as of the last business day of the month to determine the value of the asset under management.

Corporate entities and institutions will be charged a flat annual fee of 1% of the asset under management. Fees may be negotiable and, therefore, may vary by client. The final fee schedule will be included in the client's advisory agreement.

- B. **Payment of Fees.** Gen Invest will bill in arrears for accounts subject to an annual fee of 1%, while accounts subject to monthly \$1.00 fees are billed in advance. Fees are paid directly from clients' managed accounts. If there are insufficient funds in the account, the client can pay fees through other methods, including debit cards and bank transfers.



- C. **Third-Party Fees.** Clients are responsible for paying all third-party fees, including custodian, brokerage, mutual funds, and transaction fees. Those fees are separate from Gen Invest's fees and expenses.
- D. **Prepayment of Fees.** Gen Invest collects some fees in advance and some in arrears, as described above. Fees paid in advance but not earned will be refunded on a prorated basis and returned to the client effective from the following billing cycle.
- E. **Outside Compensation.** Gen Invest 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:** Gen Invest 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 compensation rather than 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.

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

We do not charge performance-based fees.



ITEM 7 - TYPES OF CLIENTS

Gen Invest provides advisory services to the following types of clients:

1. Individuals
2. High Net-worth Individuals
3. Corporations and Business Entities
4. Banks and Other Institutions

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

A. Method of Analysis, Investment Strategies.

1. Method of Analysis: Gen Invest's methods of analysis include Fundamental Analysis and Technical Analysis.

Fundamental Analysis involves the analysis of economic and financial indicators to evaluate potential investments.

Technical Analysis uses market data to assess potential investments.

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. Indexing: Utilizes strategies such as indexing to match the performance of a specific market index, typically involving lower costs and less frequent trading.

B. Material Risks. 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.

C. Risks of Specific Securities. Clients should be prepared for these risks and understand that no investment strategy can guarantee profits or protect against losses. The investment types below are not guaranteed or insured by the FDIC or any other government agency.

1. Stock Investments: Stock markets are volatile and can decline significantly due to adverse issuer, political, regulatory, market, or economic developments. Different parts of the market can react differently to these developments. In addition, stock investments are subject to risk related to market capitalization and company-specific risk.
2. ETF Investments: ETF performance may differ from its target index due to costs, transaction expenses, and temporary unavailability of specific securities. Market supply and demand may also cause ETF shares to trade at a premium or discount to their actual net asset value. Some ETFs include higher-cost securities (e.g., fixed income,



commodities, or foreign assets), which may also face limited or inaccurate valuations. Investors in ETFs pay both advisory fees to the advisor and management fees to the ETF, leading to higher costs than if the ETF were purchased directly.

3. **Fixed Income Investment:** Fixed income investments carry risks, including interest rate risk (falling market value as rates rise), credit risk (issuer defaults), inflation risk (reduced purchasing power), liquidity risk (difficulty selling), and call/reinvestment risk (early repayments). Foreign securities also have currency risk. These risks and advisory and transaction fees can impact overall returns.
4. **Non-U.S. Securities:** Investing in non-U.S. securities involves currency risk, political and economic instability, lower market liquidity, differing regulatory standards, and possible capital controls. These factors can impact returns and add complexity to managing an international portfolio.

ITEM 9 - DISCIPLINARY INFORMATION

- A. **Criminal or Civil Actions.** There are no criminal or civil actions to report.
- B. **Administrative Proceedings.** There are no administrative proceedings to report.
- C. **Self-regulatory Organizations Proceedings.** There are no self-regulatory organization proceedings to report.

ITEM 10 - OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

- A. **Registration as a Broker-Dealer or Broker-Dealer Representative.** 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. **Registration as a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trade Advisor.** Gen Invest LLC or its management person is not registered or has an application pending to register as a Futures Commission Merchant, Commodity Pool Operator, Commodity Trading Advisor, or an associated person of the foregoing entities.



- C. **Relationship material to this Advisory Business.** Gen Invest has no other relationship arrangements that would cause material conflicts of interest for our clients, and we do not recommend or select other advisors for clients.
- D. **Selection of Other Advisers.** Gen Invest has no relationship with nor select third-party investment advisers.

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

- A. **Code of Ethics.** Gen Invest has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Political Contributions, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. Gen Invest's Code of Ethics is free upon request to any client or prospective client.
- B. **Recommendation involving Material Financial Interests.** Gen Invest does not recommend that clients buy or sell any security where a related person to Gen Invest or Gen Invest has a material financial interest.
- C. **Investing Personal Money In the Same Securities as Clients.** From time to time, representatives of Gen Invest may buy or sell securities for themselves that they also recommend to clients. Such actions would create an opportunity for representatives of Gen Invest to buy or sell the same securities before or after recommending the same securities to clients, resulting in representatives profiting from the recommendations they provide to clients. Such transactions create a conflict of interest. Gen Invest will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client's disadvantage when similar securities are bought or sold.
- D. **Trading Securities Around the Same Time as Clients Securities.** From time to time, representatives of Gen Invest may buy or sell securities for themselves at or around the same time as clients. Such actions would create an opportunity for representatives of Gen Invest to buy or sell securities before or after recommending securities to clients, resulting in representatives profiting from the recommendations they provide to clients.



Such transactions create a conflict of interest; however, Gen Invest will never engage in trading that operates to the client's disadvantage if representatives of Gen Invest buy or sell securities at or around the same time as clients.

ITEM 12 - BROKERAGE PRACTICES

- A. Factors for Selecting Custodians and Broker-Dealers:** Custodians/broker-dealers will be recommended based on Gen Invest's duty to seek "best execution," which is the obligation to seek execution of securities transactions for a client on the most favorable terms for the client under the circumstances. Clients may not pay the lowest commission or commission equivalent.

Gen Invest will consider these factors in recommending custodian/broker-dealer: SEC registration and membership with FINRA and SIPC, competitive commission rates, historical performance, quality of trade execution, availability of soft dollar arrangements, written research, oral communication with analysts, admittance to research conferences and other resources provided by the custodian/broker-dealer to support Gen Invest's research efforts. Gen Invest will never charge a premium or commission on transactions, beyond the actual cost imposed by the custodian/broker-dealer.

Based on these factors, Gen Invest recommends Alpaca Securities LLC (CRD#: 288202/SEC#: 8-69928)

- B. Aggregating Block Trading for Multiple Client Accounts.** Gen Invest does not aggregate securities to be purchased or sold for multiple clients. As a result, clients will not experience more favorable prices than are possible with aggregate or block trading, particularly for illiquid securities or during volatile market conditions.

ITEM 13 - REVIEW OF ACCOUNTS

- A. Frequency and Nature of Periodic Reviews.** Gen Invest regularly monitors clients' accounts using its proprietary algorithms to ensure that their portfolio allocation aligns with their risks and objectives, investment strategy, and other account conditions. Clients are encouraged to update their profiles regularly if their goals, risk tolerance, and other essential information change.



- B. **Factors that May Trigger Non-periodic Reviews.** Gen Invest may trigger a non-periodic review of a client's accounts if the client decides to invest in securities that we believe materially deviate from the client's risk profile and objectives.
- C. **Content and Frequency of Regular Reports to Clients.** Clients will receive written reports detailing their accounts, including assets held and asset value, at least quarterly. This report will come from the custodian, and some custodians recommended by Gen Invest provide monthly statements.

ITEM 14 - CLIENT REFERRALS AND OTHER COMPENSATION

- A. **Economic Benefits Provided by Third Parties for Advice.** Gen Invest 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. **Compensation to Non-Advisory Personnel for Client Referrals.** Gen Invest 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.

ITEM 15 - CUSTODY

Gen Invest does not take custody of client accounts at any time. 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. These statements will detail the account balance, transaction history, and any fees deducted, including Gen Invest's Fees. Clients will authorize Gen Invest to facilitate the account opening with the Custodian and deduct fees from their accounts. 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 provides discretionary and non-discretionary investment advisory services to clients.

The advisory contract established with each client sets forth the discretionary authority for trading. Where investment discretion has been granted, Gen Invest manages the client's account and makes investment decisions without consulting the client regarding when the securities are to be bought or sold for the account, the total amount of the securities to be bought or sold, what securities to buy or sell, or the price per share.

ITEM 17 - VOTING CLIENT SECURITIES

Gen Invest will not ask for nor accept voting authority for client securities. Clients will receive proxies directly from the security issuer or the custodian. Clients should direct all proxy questions to the security issuer. Please direct all proxy voting questions to your custodian.

ITEM 18 - FINANCIAL INFORMATION

- A. **Balance Sheet.** Gen Invest neither requires nor solicits prepayment of more than \$1,200 in fees per client, six months or more in advance and therefore is not required to include a balance sheet with this brochure.
- B. **Financial Conditions That May Impair Ability to Meet Contractual Commitments.** Gen Invest discloses that its current financial condition includes liabilities over its total assets and a negative equity position. Gen Invest relies on additional capital contributions from its parent company to fund current operations. Once Gen Invest becomes fully operational, this financial condition is expected to be resolved.
- C. **Bankruptcy Petition in Previous Ten Years.** Gen Invest has not been the subject of a bankruptcy petition in the last ten years.