

SIGNALXCHANGE, LLC

FORM ADV PART2A Brochure

2901 W Bluegrass Blvd Suite #430

Lehi, UT 84043

www.signalxchange.com

help@signalxchange.com

October 2024

This brochure provides information about the qualifications and business practices of SignalXChange, LLC (“SignalXChange”). If you have any questions about the contents of this brochure or inquiries regarding it, please feel free to contact us via email at info@signalxchange.com. The information contained within this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Registration with the SEC as an Investment Adviser does not imply a certain level of skill or training.

Additional information about SignalXChange can be found on the SEC’s website at www.adviserinfo.sec.gov.

Item 2: Material Changes

This is the initial brochure for SignalXChange, LLC.

Item 3: Table of Contents

1. Cover Page
2. Material Changes
3. Table of Contents
4. Advisory Business
5. Fees and Compensation
6. Performance-Based Fees
7. Types of Clients
8. Methods of Analysis, Investment Strategies, and Risk of Loss
9. Disciplinary Information
10. Other Financial Industry Activities and Affiliations
11. Code of Ethics, Participation or Interest in Client Transactions, and Personal Trading
12. Brokerage Practices
13. Review of Accounts
14. Client Referrals and Other Compensation
15. Custody
16. Investment Discretion
17. Voting Client Securities
18. Financial Information

Item 4: Advisory Business

SignalXChange, LLC (“SignalXChange”) is a digital investment advisory firm based in Lehi, Utah, providing subscription-based access to tools that enable users to create and simulate trading strategies. As disclosed in the Firm’s ADV Part 1A, SignalXChange is wholly owned by Milo Prime, LLC of which Brett Simberkoff is the principal control person. This brochure accompanies SignalXChange’s initial application for registration as an investment adviser with the United States Securities and Exchange Commission (“SEC”).

Advisory Services and Platform Features

SignalXChange provides a digital advisory model through its online platform, allowing clients to access and simulate trading strategies within a controlled, user-centered environment and, in the future, replicate strategies in their brokerage accounts.

Access Strategy Portfolios. Through SignalXChange, users gain access to a variety of trading strategies curated by individual traders on the platform. Each strategy’s past performance is available for review, helping users assess its viability based on historical data and key metrics.

Simulate Strategies with Virtual Funds. To support risk assessment and strategy refinement, SignalXChange allows users to simulate trades with virtual funds. This feature enables users to test strategies under real-market conditions without financial risk, providing valuable insights before committing to actual investments.

Replicate Strategies. Users can replicate selected strategies in real time using SignalXChange’s simulation tools and, in the future, through connections to self-directed brokerage accounts. Automated trading and replication mechanisms will automatically trigger corresponding trades in users’ linked brokerage accounts. SignalXChange also enables users to set specific parameters for notifications and automated termination of replicated strategies based on pre-set risk tolerance thresholds, such as volatility or loss limits.

Risk Controls

In the future, SignalXChange may provide an auto-trading option through integrated self-directed brokerage accounts, allowing clients to automate the execution of selected strategies. Users are encouraged to simulate any strategy before engaging in actual trading to understand its potential behavior. While SignalXChange provides access to these strategies, it does not endorse specific strategies or conduct independent validation. The platform emphasizes that past performance is not indicative of future results and encourages users to carefully consider the risks associated with replicating strategies.

Rebalancing and Strategy Adjustments. Clients have the discretion to rebalance and adjust their selected strategies. While SignalXChange does not engage in active portfolio management, the platform enables clients to change which strategy is used or terminate their strategies in response to market conditions, changes in personal risk tolerance, or any alerts triggered by platform-based loss thresholds or by the user. Clients may also impose specific restrictions on their strategies, including adjustments to asset types or concentration levels within a strategy.

Strategy Monitoring and Restrictions. SignalXChange uses automated systems to monitor each strategy’s risk factors, such as asset concentration and significant losses. Clients may set custom restrictions to prevent over-concentration in certain asset classes or to cap potential losses within a chosen tolerance level. If a strategy exceeds a pre-set threshold for losses or asset concentration, the system will automatically notify the client and prompt them to confirm

whether they wish to proceed with the strategy as-is, adjust the allocation, or discontinue replication.

User Profiles and Risk Scoring. Clients of SignalXChange are encouraged to evaluate strategies based on their individual risk tolerance and investment objectives. SignalXChange does not assign a specific risk score but provides tools and data to aid in this assessment. Clients can customize and limit their exposure to certain strategies depending on their risk profile.

Advisory Limitations and Disclaimers

As a technology-based advisory service, SignalXChange is designed for users who are comfortable with online platforms. Auto-trading tools are intended for use only by those who have a high-risk tolerance and are prepared for the potential of losing an investment. The platform operates on a self-directed basis, meaning clients are responsible for selecting strategies and understanding the associated risks. SignalXChange does not provide individualized financial planning, tax, or legal advice. SignalXChange emphasizes that past performance is not indicative of future results and that users should rely on their own examination of a strategy.

SignalXChange does not have custody over client assets; all transactions and holdings remain within the client's chosen brokerage account. The SignalXChange platform solely provides the technology to facilitate strategy replication and monitoring.

As an online service, SignalXChange does not offer in-person advisory services. Clients interact with SignalXChange exclusively through electronic means, with all communications delivered via the platform.

Amount Under Management

As of October 30, 2024, SignalXChange does not have any client assets under management.

Item 5: Fees and Compensation

The SignalXChange platform allows clients to test trading strategies on a trial basis at no cost, without requiring payment or real investments (the “Free Plan”). The Free Plan allows users to create trading strategies and simulate the trading strategy to test how the strategy would have performed. SignalXChange does not currently charge any fees for advisory services. However, if an advisory fee is introduced in the future, it will be set at a flat monthly fee of \$20 per connected brokerage account to implement trading features. All fees will be billed in advance on a monthly basis, with an option to pay annually at a discounted rate. These fees do not depend on assets or transactions in the client’s account.

SignalXChange may amend its fee schedule by providing users with thirty (30) days’ advance written notice. From time to time, SignalXChange may also waive or discount its fees at its sole discretion. If a client terminates the service before the end of the billing period, fees are non-refundable, and no partial refunds are provided for unused portions unless access to the SignalXChange platform is terminated.

SignalXChange does not charge transaction fees; however, clients who link their brokerage accounts to the SignalXChange platform may incur additional fees imposed by their chosen brokerage. These brokerage fees are outside of SignalXChange’s control and may include transaction costs, commissions, or other service fees. The brokerage firm sets these and are separate from any subscription fees charged by SignalXChange. Clients are encouraged to review their brokerage’s fee schedule to understand the costs that may apply when executing trades through a linked brokerage account.

Item 6: Performance-Based Fees

SignalXChange does not charge performance-based fees.

Item 7: Types of Clients

SignalXChange is available to individuals through its online platform. Clients may be individual, retail investors, or self-directed traders looking to access and replicate trading strategies. There are no minimum investment requirements to use the platform or its simulation tools. However, clients must have a self-directed brokerage account with a compatible broker to implement live trading strategies.

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

SignalXChange provides a platform where individual users can design and share their trading strategies. Clients can browse and select from these user-created strategies, each of which may include settings for periodic rebalancing based on the creator's design. The securities within each strategy are selected by the strategy creators, who may consider factors such as company fundamentals, technical analysis, macroeconomic events, alternative data, market sentiment, and behavioral trends. SignalXChange does not analyze, manage, or control the underlying securities or assets in client accounts, nor does it receive compensation from the managers of those securities.

As a facilitator, SignalXChange may in the future, allow clients to replicate strategies in their own brokerage accounts. Clients have tools to evaluate and adopt strategies based on their individual investment objectives and risk tolerance. While some strategies may incorporate diversification and hedging techniques to help mitigate market downturns, clients need to conduct their own research on each investment, as SignalXChange does not independently verify or analyze the strategies shared on its platform. Clients can adjust strategies, including swapping, replacing, or removing securities and modifying rebalancing schedules as they see fit. Rebalancing and trade executions are performed within the operational hours set by the client's brokerage, and clients should be aware that strategies relying on automation to control transactions carry inherent risks, including potential losses.

Investing in securities entails risk, including the potential loss of the principal amount invested. Clients who are not prepared to bear these risks should refrain from engaging in this type of trading activity. There is no guarantee that the intended results of a strategy on SignalXChange will match the actual outcomes. Past performance of any security or strategy does not indicate future results or mitigate the risk of loss. High volatility or a lack of liquidity for a given security may prevent sales at an advantageous time or price. Clients may be forced to sell at a significant discount if there is difficulty finding a buyer.

Methods of Analysis and Investment Strategies

The SignalXChange platform allows clients to adopt or modify strategies developed by other users, including strategies that may involve high risk. Typical strategies available on the platform may include:

- **Equity Trading.** Most strategies focus on U.S. equities, with potential future expansion to options, futures, and forex markets. Strategies may range from short-term, high-frequency trading to longer-term, value-based approaches.
- **Leveraged and Margin Strategies.** Some strategies may utilize leverage or margin trading, which can amplify both gains and losses. Clients should understand the heightened risks associated with leveraged strategies, including the risk of losing more than the initial investment.
- **Simulated Trading.** SignalXChange allows users to test strategies with simulated funds before actual implementation. This feature helps clients understand potential outcomes without committing real capital.

The trading strategies available on SignalXChange may utilize a variety of investment methodologies, depending on the individual traders who develop them. Common methods of analysis include:

- Technical Analysis. Strategies may rely on technical indicators, chart patterns, and historical price movements to identify trading opportunities.
- Fundamental Analysis. Some strategies may incorporate an analysis of company fundamentals, such as financial statements, earnings reports, and macroeconomic factors.
- Quantitative Analysis. Certain strategies may employ quantitative models that use algorithms and data-driven techniques to inform trading decisions.

SignalXChange does not verify the methodologies or back-test results provided by individual traders and emphasizes that the appropriateness of each strategy depends on the client's own risk tolerance and investment objectives. Users are encouraged to conduct their own due diligence when selecting strategies.

Material Risks Involved

Investing in securities involves a significant risk of loss, which clients should be prepared to bear. SignalXChange discloses that past performance is not indicative of future results, and clients should carefully consider the risks associated with each strategy. Notable risks include:

- Market Risk. Market risk involves the potential for losses due to factors that affect the overall performance of the financial markets. The price of any security or the value of an entire asset class can decrease due to various factors beyond the control of SignalXChange, including but not limited to changes in economic conditions, shifts in market sentiment, fluctuations in interest rates, government regulations, and domestic or international political events. Clients using SignalXChange's platform should be aware that market risk can significantly impact the performance of the strategies selected. If a strategy involves a high allocation or concentrated exposure to a particular asset class, an underperformance in that asset class could negatively affect the strategy's overall performance. Conversely, strategies with lower or minimal exposure to an outperforming asset class may underperform relative to the broader market, as they may miss out on gains that could have been realized with a higher allocation.

- Investment Risk. Strategies or securities selected on SignalXChange may not perform as expected, regardless of overall market conditions. Individual strategies may underperform due to company-specific issues, poor timing, or incorrect assumptions made by the strategy creators. Each strategy on SignalXChange is created by users based on their judgment and preferences, with no guarantee of achieving intended goals. Factors such as changing company fundamentals, industry trends, or unforeseen events can negatively impact the securities within a strategy, potentially leading to losses.

Investment risk also includes the chance that chosen strategies may not align with a client's personal investment objectives. It is essential for clients to carefully review and select strategies that match their risk tolerance and financial goals to help mitigate this risk. Past performance is not indicative of future results, and there is always a risk of losing the principal invested. Strategies that were successful in the past may not perform well under future market conditions.

- Concentration Risk. Concentration risk arises when a strategy or portfolio is heavily focused on a limited number of securities, sectors, or asset classes and lacks diversification. This lack of diversification can lead to significant volatility, as the performance of the concentrated securities or sectors can have an outsized impact on the overall value of the investment. On SignalXChange, users may encounter strategies that exhibit high levels of concentration, either by choice or by the nature of the strategy itself. Strategies with

concentrated investments are particularly vulnerable to adverse events that impact the specific securities or sectors in which they are invested. For example, a strategy that focuses primarily on technology stocks may experience substantial losses if the technology sector faces downturns due to regulatory changes, shifts in consumer demand, or competitive pressures. Conversely, this type of concentrated strategy may miss out on gains from other sectors or asset classes that perform well during the same period.

- Multiple Strategy Risk. If a client on SignalXChange allocates capital across multiple strategies, each of which makes independent trading decisions, it is possible that one or more strategies may take opposing positions at the same time. For example, one strategy may buy a security while another may sell the same security. Additionally, strategies may compete for similar positions, potentially reducing overall effectiveness. Clients should be aware of the potential for conflicting or overlapping trades when using multiple strategies simultaneously.

- Volatility Risk. Volatility risk refers to the potential for sharp and unpredictable price movements in the market. Strategies on SignalXChange may involve assets with varying levels of volatility, which can lead to rapid gains or losses. Clients should be aware that high-volatility assets can experience sudden price swings, increasing the overall risk of their portfolio. Evaluating a strategy's volatility exposure is crucial to understanding how it aligns with a client's risk tolerance.

- Correlation Risk. Correlation risk occurs when assets that are expected to behave differently start moving in the same direction, especially during market stress. This reduces the benefits of diversification and can lead to increased losses. Clients should recognize that even well-diversified strategies may experience heightened correlation in volatile markets, reducing their effectiveness in protecting against losses.

- Software Risk. SignalXChange provides its services through an automated software platform, which carries inherent technology-related risks that could impact strategy performance. While SignalXChange strives for reliable platform operations, technical issues like system malfunctions, coding errors, or connectivity disruptions may lead to delays, incorrect signals, or unintended actions, potentially resulting in financial losses for clients. Additionally, external factors—such as power outages, cyber-attacks, or data breaches—can disrupt service. Certain strategies may rely on historical data, algorithms and assumptions, which cannot accurately predict future market conditions, especially in volatile environments.

- Cybersecurity Risks. SignalXChange, its service providers, client brokers, and custodians are all exposed to cybersecurity risks, which involve potential breaches of technology, systems, and processes designed to protect networks, data, and confidential information from unauthorized access or cyber-attacks. Cyber-attacks can be deliberate or unintentional, yet both can result in significant damage, including disruption to hardware and software systems, loss or corruption of data, and the misappropriation of confidential information. A cybersecurity breach could interfere with the processing of transactions, disrupt trading activity, or affect the accurate calculation of portfolio values. Such breaches may expose SignalXChange and its clients to financial losses, identity theft, and unauthorized use of personal or proprietary information. Clients may also face substantial costs, including those associated with investigation of unauthorized use, identity protection measures, litigation, and resolving the breach. While SignalXChange has response plans in place to mitigate these risks, no system is entirely immune to cyber threats. SignalXChange disclaims association with broker-dealers and custodians, who independently manage trades and store client assets, and

clients are encouraged to inquire directly with these providers about their cybersecurity policies, as SignalXChange cannot control the precautions taken by third-party service providers.

- Execution Risk. Due to the reliance on third-party brokers for trade execution, clients may face delays or issues beyond SignalXChange's control. Factors such as market liquidity, broker availability, or technological malfunctions could result in trades not being executed at the intended prices, potentially leading to losses.
- Liquidity Risk. A strategy may include a security that cannot be bought or sold quickly enough without significantly affecting its price. In times of market stress, some assets may become difficult to trade, forcing clients to sell at a discount or preventing them from selling at all. Clients on SignalXChange should be aware that strategies involving less liquid assets may face challenges during volatile periods, potentially leading to unexpected losses.
- Valuation Risk. There may be cases where the price of a security does not accurately reflect its true value, often due to inaccurate or unavailable market data. This can result in over- or under-valuation of assets, leading to unwanted investment results. On SignalXChange, strategies may rely on external data sources for valuations, which could be incorrect or outdated, potentially impacting the strategy's performance and leading to losses.
- Credit Risk. When issuers of securities held by an ETF, such as bonds, fail to meet their financial obligations, credit risk arises. This can lead to a decline in the ETF's value. Fixed income and bond ETFs are particularly exposed to credit risk, as their performance depends on the issuers' ability to repay. Clients should be aware that credit downgrades, defaults, or economic downturns may increase the likelihood of significant losses in these ETFs.
- Equity-Related Risks. Equity securities are inherently risky, as their value can fluctuate based on factors such as company performance, industry trends, or broader economic conditions. Investments in stocks may experience dramatic short-term price changes. Clients should be aware that strategies involving equity securities may be highly sensitive to market volatility and economic downturns, which can negatively impact their portfolios.
- Legislative Risk. Legislative risk refers to the potential impact of changes in laws or regulations on the value of securities. Government actions, such as new financial regulations, changes to investment adviser rules, or shifts in industry-specific policies, can significantly affect the performance of certain strategies or asset classes on SignalXChange. Changes in tax regulations are particularly important, as they may affect the treatment of capital gains, dividends, or interest income. Alterations to tax codes could increase a client's tax liabilities, reduce after-tax returns, or change the reporting requirements for certain securities, such as ETFs. Clients should stay informed about legislative and tax developments that may influence their investments.
- High Volume and Frequency Trading Risk. Some strategies may engage in high-volume or high-frequency trading activity, which presents potential risks. High trading activity can result in less favorable execution by widening the bid-ask spread, raising transaction costs, and pushing trade prices beyond expected ranges. In volatile markets, unfulfilled orders may cause portfolios to drift from their intended allocation, affecting performance. Frequent trading can also disqualify transactions from qualified dividend tax treatment and increase the likelihood of trading errors.
- Inflation, Currency, and Interest Rate Risks. Fluctuations in inflation, currency exchange rates, and interest rates can significantly affect investment performance. Rising inflation reduces purchasing power, while interest rate changes can impact both equity and

fixed-income assets. Currency risk becomes relevant in strategies involving international investments, as exchange rate movements can impact returns. Clients should consider how these macroeconomic factors may influence their selected strategies and prepare for potential declines in asset values.

- Catastrophic Risks. SignalXChange, its service providers, and clients may face risks arising from catastrophic events beyond their control. These include, but are not limited to, natural disasters (such as hurricanes, earthquakes, or floods), public health crises (such as pandemics or epidemics), acts of war or terrorism, cyber-terrorism, and large-scale power outages or network interruptions. Such events can disrupt market operations, prevent timely execution of trades, or lead to significant market volatility. Clients should be aware that these risks may affect the performance of their investments and result in unexpected losses. While SignalXChange has contingency plans in place, these risks cannot be entirely mitigated.

- Limitation of Disclosure. The risks outlined in this document are not intended to be exhaustive. While SignalXChange strives to provide accurate and comprehensive information, clients may be subject to additional or unforeseen risks that have not been identified or disclosed here. The nature of investments and markets is inherently unpredictable, and new risks can emerge over time. Clients are encouraged to conduct their own due diligence and seek professional advice when necessary. SignalXChange cannot guarantee the complete accuracy of all information provided and recommends that clients regularly review and update their understanding of relevant risks.

Item 9: Disciplinary Information

SignalXChange, LLC and its management personnel have no disciplinary history to report.

Item 10: Other Financial Industry Activities and Affiliations

SignalXChange, LLC is an independent investment advisory firm. SignalXChange may allow users to connect self-directed brokerage accounts to the platform for executing trades. For users without a brokerage account, SignalXChange may provide a list of compatible brokers. There is no monetary or material affiliation with these brokerages, and no compensation is received for facilitating trades or recommending their services. Clients remain customers of the broker they choose, with no financial benefit to SignalXChange. Although SignalXChange may benefit indirectly from these brokers' services, this does not interfere with the provision of objective advice due to SignalXChange's independent operating structure and controls.

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

SignalXChange, LLC has adopted a Code of Ethics (the “Code”) that requires its employees and related persons to prioritize client interests above their own and to act honestly and fairly in all client interactions. While employees and related persons may invest in securities recommended to clients, all personal trading is monitored under the Code to prevent conflicts and avoid unethical or illegal activity such as rumor-mongering, insider trading, or stock manipulation.

SignalXChange does not engage in or recommend transactions where the firm or related persons hold a material financial interest. The firm does not buy or sell securities for its own account and remains independent of brokerages used by clients, ensuring objective and unbiased advice.

Item 12: Brokerage Practices

Selection of Brokers and Custodians

SignalXChange, LLC does not have affiliated brokers or custodians. Clients are responsible for selecting their own self-directed brokerage accounts to execute trades based on the strategies available on our platform. While SignalXChange provides a list of compatible brokers for clients who do not have an account, we do not recommend specific brokers and have no financial affiliations with any brokerage firm. Clients should choose a brokerage based on their own preferences regarding fees, services, and platform functionality.

As SignalXChange does not execute trades on behalf of clients, the responsibility for ensuring the best execution rests with the client's chosen broker. Clients should be aware that brokerage fees, execution speed, and the quality of trade execution may vary across brokers. SignalXChange does not control these factors, and clients are encouraged to review their broker's execution practices to ensure they align with their trading needs and strategy implementation.

SignalXChange does not aggregate or allocate trades across client accounts. Each client's account operates independently through their selected brokerage, and the client manages all trading activity based on the strategies they choose to implement. There are no arrangements to pool client trades.

SignalXChange does not receive soft dollar benefits or any form of compensation from brokers, custodians, or third-party financial institutions. We maintain independence in our operations and provide access to strategies on our platform without any financial incentive tied to brokerage services.

Item 13: Review of Accounts

SignalXChange provides clients with continuous access to the platform, where they can view real-time information about their selected strategies, portfolio allocations, simulated trades and account activity. If auto-trading and strategy replication is enabled through integration with a client's self-directed brokerage account, client portfolios will automatically adjust and execute trades based on the strategies they have implemented. SignalXChange prompts clients to review their accounts when specific changes in position occur and allows clients to set additional alerts for specific trading events. Changes or adjustments to the strategies must be made by the client. Accounts may be frozen if the activity is suspected of market manipulation or other illegal or unethical behaviors. Brokerages may have their own review procedures and freeze mechanisms in place, which are beyond SignalXChange's control.

Item 14: Client Referrals and Other Compensation

SignalXChange, LLC does not compensate third parties for client referrals, nor does it receive compensation from external sources for referring clients to other services.

Item 15: Custody

This item is not applicable as SignalXChange does not directly manage, hold, or control any client funds or securities.

Item 16: Investment Discretion

SignalXChange may provide access to tools enabling auto-trading of copied strategies on a limited discretionary basis. If clients select a strategy, trades will be executed in the client's self-directed brokerage account without contacting the client prior to each trade for permission.

By agreeing to the SignalXChange platform's terms and conditions, the client grants limited discretionary authority to SignalXChange solely for the purpose of utilizing portfolio management tools to manage investment activity in accordance with the client's selected strategy. Clients retain full control and can modify or discontinue their participation in any strategy at any time on a self-directed basis. SignalXChange's discretionary authority is strictly limited to executing trades based on the chosen strategy and only maintains the discretion to freeze or stop activity that appears to be in violation of the terms of use.

Item 17: Voting Client Securities

SignalXChange does not have the authority to vote securities on behalf of its clients. Clients will receive proxies or other voting materials directly from their custodian or brokerage. Accordingly, clients are responsible for managing their own voting decisions and cannot contact SignalXChange with questions regarding specific proxy solicitations or voting instructions.

Item 18: Financial Information

SignalXChange does not require the prepayment of any fees six or more months in advance. While SignalXChange offers clients the option to pay subscription fees annually, this is not required. SignalXChange does not have any financial conditions that are reasonably likely to impair its ability to meet its contractual obligations to clients. Furthermore, SignalXChange has not been the subject of a bankruptcy proceeding.