

Ocho Investment Advisors, LLC
Form CRS Customer Relationship Summary

March 20, 2024

Ocho Investment Advisors, LLC (“the Firm” or “we”) is registered with the Securities and Exchange Commission (SEC) as an investment adviser. Brokerage and investment advisory services and fees differ and it is important for you to understand these differences. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://www.investor.gov/crs), which also provides educational materials about broker-dealers, investment advisers, and investing.

What investment services and advice can you provide me?

The Firm offers both non-discretionary and discretionary investment advisory services as described in our Ocho Investment Advisors Brochure. We operate as an internet advisor through an automated and interactive web-based process. Through our advisory services, we conduct ongoing investment monitoring and portfolio advice. Our advisory program is limited to Solo 401(k), IRA and individual taxable accounts, and to those who use The Vibes Co.’s digital platform.

Account Monitoring:

Flexible (non-discretionary) Accounts - The Firm offers non-discretionary investment advisory services (**Flexible** Accounts) through our web or mobile platform by assessing your risk tolerance, recommending certain ETFs based on that assessment. Because we have no discretionary authority over your account(s), you make the ultimate decision regarding the purchase or sale of investments and we will not monitor your account.

The accuracy of your investor profile will affect the results of our recommendations. When your profile requires updates or corrections, you may make changes by accessing your settings page in the app. Other than providing these recommendations, we do not tailor our services to your individual financial circumstances.

Automated (discretionary) Accounts – We will construct a diversified portfolio comprised of ETFs based on your risk profile. Automated Accounts are rebalanced automatically and daily for cash balance, allocation drift and changes to the portfolio holdings according to parameters we have created. Portfolio holdings are reviewed by our investment committee at least quarterly.

Account Minimums: Our advisory program has a one-dollar minimum account size requirement.

Limited Investment Offerings:

The securities available are a limited universe of exchange traded funds (“ETFs”) and equities, subject to change, as determined by the clearing firm. All users have access to the same universe of securities. We do not offer proprietary investment products.

While we do not accept custody of client assets, we work with a qualified custodian. For additional information, please see our Ocho Investment Advisors Brochure.

Conversation Starters:

- *Given my financial situation, should I choose to work with an investment adviser? Why or why not?*
- *How will you choose investments to recommend to me?*
- *What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?*

What fees will I pay?

Advisory Fees: In order to open an Invest Account, OIA clients must also be a client of The Vibes Company Inc. (Vibes), which charges yearly subscription fees. The Vibes Basic Plan costs \$299 annually and includes optional advisory services. Please visit www.carrymoney.com for information on the Vibes programs and costs. OIA clients who are also clients of Vibes are not charged a fee for advisory services.

	<p>For OIA clients who have canceled their subscription to Vibes program and are no longer clients of Vibes, OIA will cease to provide advisory services.</p> <p>The issuers of some of the securities you purchase will charge ongoing internal product fees that affect your account performance. Depending on the activities or services, the clearing firm and custodian also charge you other fees (transaction fees, account transfer, physical trade confirm, etc.)</p> <p><i>You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.</i></p> <p>For additional information about our firm's fees, as well as other fees are included in our Ocho Investment Advisors ADV2A Brochure.</p> <p>Conversation Starters:</p> <p><i>-Help me understand how these fees and costs might affect my investments.</i></p> <p><i>- If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?</i></p>
What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?	<p>When we act as your investment adviser, we must act in your best interest and not put our interest ahead of yours. At the same time, our business model creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here are some examples to help you understand what this means.</p> <ul style="list-style-type: none"> • <i>The Firm advises on a limited universe of securities; other advisory firms can provide different services and different investment choices.</i> • <i>You are required to appoint DriveWealth, LLC as your broker dealer and custodian. Other broker dealers may provide different services and have different capabilities.</i> • <i>Although we believe our fees are competitive, lower fees for comparable services may be available from other investment advisers or broker dealers. Fees and costs will reduce any amount of money you make on your investments over time.</i> • <i>Our parent company, Vibes, offers separate and distinct Solo 401(k) Plan set-up and other educational services. If you purchase a subscription from Vibes, our parent company receives fees. Although the Firm does not share in the revenue, we do have an indirect financial interest in clients subscribing to our parent company's services.</i> <p>Conversation Starters:</p> <p><i>How might your conflicts of interest affect me, and how will you address them?</i></p> <p>For additional information, please see Ocho Investment Advisors ADV 2A Brochure.</p>
How do your financial professionals make money?	<p>Investment professionals are generally compensated both in the form of a fixed monthly fee from the Firm, as well as a discretionary annual bonus based on criteria such as merit, employee performance and performance of the Firm. Investment professionals employed by the Firm are not compensated on a transaction basis.</p>
Do you or your financial professionals have legal or disciplinary history?	<p>No. Please visit Investor.gov/CRS for a free and simple search tool to research us and our financial professionals.</p> <p>Conversation Starter:</p> <p><i>As a financial professional, do you have any disciplinary history? For what type of conduct?</i></p>
Additional Information	<p>For additional information about our services, please review our Form ADV Parts 1 and 2A found at www.adviserinfo.sec.gov. If you would like additional information, please call 201.777.1987.</p>