

# **Pelican Invests, LLC**

## **Form ADV Part 2A – Disclosure Brochure**

**Effective: April 16, 2024**

This Form ADV Part 2A ("Disclosure Brochure") provides information about the qualifications and business practices of Pelican Invests, LLC ("Pelican Invests" or the "Advisor"). If you have any questions about the content of this Disclosure Brochure, please contact the Advisor at 347-450-1767 or by email at [Hello@PelicanInvests.com](mailto:Hello@PelicanInvests.com).

Pelican Invests is a registered investment advisor with the U.S. Securities and Exchange Commission. The information in this Disclosure Brochure has not been approved or verified by the U.S. Securities and Exchange Commission ("SEC") or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information about Pelican Invests to assist you in determining whether to retain the Advisor.

Additional information about Pelican Invests and its Advisory Persons is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor's firm name or CRD# 329771.

**Pelican Invests, LLC**  
**69 Charlton Street, New York, NY 10014**  
**Phone: 347-450-1767**  
**[www.PelicanInvests.com](http://www.PelicanInvests.com)**

## Item 2 – Material Changes

---

Form ADV 2 is divided into two parts: *Part 2A (the "Disclosure Brochure")* and *Part 2B (the "Brochure Supplement")*. The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about the Advisory Persons of Pelican Invests.

Pelican Invests believes that communication and transparency are the foundation of its relationship with clients and will continually strive to provide you with complete and accurate information at all times. Pelican Invests encourages all current and prospective clients to read this Disclosure Brochure and discuss any questions you may have with the Advisor.

### Material Changes

Pelican Invests is a newly formed registered investment advisor. This is the initial filing of the Disclosure Brochure.

### Future Changes

From time to time, the Advisor may amend this Disclosure Brochure to reflect changes in business practices, changes in regulations or routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to you annually and if a material change occurs.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor's firm name or CRD# 329771. You may also request a copy of this Disclosure Brochure at any time by contacting the Advisor at 347-450-1767 or by email at [Hello@PelicanInvests.com](mailto:Hello@PelicanInvests.com).

### Item 3 – Table of Contents

---

<b>Item 1 – Cover Page</b>	<b>1</b>
<b>Item 2 – Material Changes</b>	<b>2</b>
<b>Item 3 – Table of Contents</b>	<b>3</b>
<b>Item 4 – Advisory Services</b>	<b>4</b>
A. Firm Information	4
B. Advisory Services Offered	4
C. Client Account Management	4
D. Wrap Fee Programs	5
E. Assets Under Management	5
<b>Item 5 – Fees and Compensation</b>	<b>5</b>
A. Fees for Advisory Services	5
B. Fee Billing	5
C. Other Fees and Expenses	5
D. Advance Payment of Fees and Termination	5
E. Compensation for Sales of Securities	5
<b>Item 6 – Performance-Based Fees and Side-By-Side Management</b>	<b>5</b>
<b>Item 7 – Types of Clients</b>	<b>6</b>
<b>Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss</b>	<b>6</b>
A. Methods of Analysis	6
B. Risk of Loss	6
<b>Item 9 – Disciplinary Information</b>	<b>7</b>
<b>Item 10 – Other Financial Industry Activities and Affiliations</b>	<b>7</b>
<b>Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading</b>	<b>7</b>
A. Code of Ethics	8
B. Personal Trading with Material Interest	8
C. Personal Trading in Same Securities as Clients	8
D. Personal Trading at Same Time as Client	8
<b>Item 12 – Brokerage Practices</b>	<b>8</b>
A. Recommendation of Custodian[s]	8
B. Aggregating and Allocating Trades	9
<b>Item 13 – Review of Accounts</b>	<b>9</b>
<b>Item 14 – Client Referrals and Other Compensation</b>	<b>9</b>
A. Compensation Received by Pelican Invests	9
B. Compensation for Client Referrals	9
<b>Item 15 – Custody</b>	<b>9</b>
<b>Item 16 – Investment Discretion</b>	<b>9</b>
<b>Item 17 – Voting Client Securities</b>	<b>9</b>
<b>Item 18 – Financial Information</b>	<b>9</b>
<b>Form ADV Part 2B – Brochure Supplement</b>	<b>10</b>
<b>Privacy Policy</b>	<b>13</b>

## Item 4 – Advisory Services

---

### A. Firm Information

Pelican Invests, LLC (“Pelican Invests” or the “Advisor”) is a registered investment advisor with the U.S. Securities and Exchange Commission. The Advisor is organized as a Limited Liability Company (LLC) under the laws of the State of Delaware. Pelican Invests was founded in January 2024 and is owned by Pelican Gift, Inc. Pelican Invests is operated by Alexandra K. Bono (CEO and Chief Compliance Officer). This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by Pelican Invests.

### B. Advisory Services Offered

Pelican Invests offers investment advisory services to individuals and high net worth individuals (each referred to as a “Client”).

The Advisor serves as a fiduciary to Clients, as defined under the applicable laws and regulations. As a fiduciary, the Advisor upholds a duty of loyalty, fairness and good faith towards each Client and seeks to mitigate potential conflicts of interest. Pelican Invests' fiduciary commitment is further described in the Advisor's Code of Ethics. For more information regarding the Code of Ethics, please see Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.

#### Investment Advisory Services

Pelican Invests provides portfolio recommendations through its Pelican Invests platform. Pelican Invests provides the Client with a self-guided questionnaire to identify the Client's investment goals, objectives, education savings, overall financial situation, and risk tolerance. Pelican Invests will provide portfolio recommendations and action steps based on the Client inputs to achieve the needs of its Clients. Pelican Invests will recommend an investment portfolio primarily consisting of low cost, diversified mutual funds and/or exchange-trade funds (“ETFs”) to achieve the Client's investment goals. Pelican Invests does not have discretionary trading authority over the Client's portfolio. The Client will be responsible for deciding the purchase or sale of securities that are recommended by the Advisor. The Advisor's platform does not allow the Client to have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio. Pelican Invests may also provide a variety of financial education materials based on the service rendered.

Pelican Invests offers two subscription tiers for its investment advisory services. Tier 1 services offered by Pelican Invests will provide Clients with general investment recommendations, funding resources, and savings support to assist Clients with saving for investment goals. Tier 2 services offered by Pelican Invests will provide Clients with specific portfolio recommendations based on the time horizon and investment goals set by the Client.

At no time will Pelican Invests accept or maintain custody of a Client's funds or securities, except for the limited authority as outlined in Item 15 – Custody. All Client assets will be managed within the designated account[s] at the Custodian, pursuant to the terms of the advisory agreement. Please see Item 12 – Brokerage Practices.

*Retirement Accounts* – When the Advisor provides investment advice to Clients regarding ERISA retirement accounts or individual retirement accounts (“IRAs”), the Advisor is a fiduciary within the meaning of Title I of the Employee Retirement Income Security Act (“ERISA”) and/or the Internal Revenue Code (“IRC”), as applicable, which are laws governing retirement accounts. When deemed to be in the Client's best interest, the Advisor will provide investment advice to a Client regarding a distribution from an ERISA retirement account or to roll over the assets to an IRA, or recommend a similar transaction including rollovers from one ERISA sponsored Plan to another, one IRA to another IRA, or from one type of account to another account (e.g. commission-based account to fee-based account). Such a recommendation creates a conflict of interest if the Advisor will earn a new (or increase its current) advisory fee as a result of the transaction. No client is under any obligation to roll over a retirement account to an account managed by the Advisor.

### C. Client Account Management

Prior to engaging Pelican Invests to provide investment advisory services, each Client is required to enter into an agreement with the Advisor that define the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

- Establishing an Investment Strategy – Pelican Invests will develop an investment strategy that seeks to achieve the Client's goals, objectives, time horizon, and risk tolerance.

#### **D. Wrap Fee Programs**

Pelican Invests does not manage or place Client assets into a wrap fee program.

#### **E. Assets Under Management**

Pelican Invests is a newly established advisor. Assets under management shall be reported with the Advisor's next filing of this Disclosure Brochure. Clients may request more current information at any time by contacting the Advisor.

### **Item 5 – Fees and Compensation**

---

The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client engaging the Advisor for services described herein shall be required to enter into a written agreement with the Advisor.

#### **A. Fees for Advisory Services**

##### Investment Advisory Services

Pelican Invests offers two (2) subscription tiers of services. Tier 1 fees are \$4.99 paid monthly in advance. Tier 2 fees are paid \$12.99 paid monthly in advance. Fees are not negotiable.

#### **B. Fee Billing**

##### Investment Advisory Services

Investment advisory fees are invoiced monthly in advance by the Advisor. Fees are paid via credit card.

#### **C. Other Fees and Expenses**

All fees paid to Pelican Invests for investment advisory services are separate and distinct from the expenses charged by mutual funds and ETFs to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee.

#### **D. Advance Payment of Fees and Termination**

##### Investment Advisory Services

Pelican Invests is compensated for its investment advisory services in advance of the month in which month services are rendered. Either party may terminate the investment advisory agreement, at any time, by providing advance written notice to the other party. The Client may also terminate the investment advisory agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Upon termination, the Advisor will refund any unearned, prepaid investment advisory fees from the effective date of termination to the end of the month. The Client's investment advisory agreement with the Advisor is non-transferable without the Client's prior consent.

#### **E. Compensation for Sales of Securities**

Pelican Invests does not buy or sell securities to earn commissions and does not receive any compensation for securities transactions in any Client account, other than the investment advisory fees noted above.

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

---

Pelican Invests does not charge performance-based fees for its investment advisory services. The fees charged by Pelican Invests are as described in Item 5 above and are not based upon the capital appreciation of the funds or securities held by any Client.

Pelican Invests does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

## **Item 7 – Types of Clients**

---

Pelican Invests offers investment advisory services to individuals and high net worth individuals. Pelican Invests generally does not impose a minimum relationship size.

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

---

### **A. Methods of Analysis**

Pelican Invests primarily employs a fundamental analysis method in developing investment strategies for its Clients. Research and analysis from Pelican Invests are derived from numerous sources, including financial media companies, third-party research materials, Internet sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others.

*Fundamental analysis* utilizes economic and business indicators as investment selection criteria. This criteria consists generally of ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

As noted above, Pelican Invests generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. Pelican Invests will typically hold all or a portion of a security for more than a year, but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, Pelican Invests may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector or asset class.

### **B. Risk of Loss**

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. Pelican Invests will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

While the methods of analysis help the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in these methods of analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account[s]. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process. Following are some of the risks associated with the Advisor's investment strategies:

#### Market Risks

The value of a Client's holdings may fluctuate in response to events specific to companies or markets, as well as economic, political, or social events in the U.S. and abroad. This risk is linked to the performance of the overall financial markets.

#### ETF Risks

The performance of ETFs is subject to market risk, including the possible loss of principal. The price of the ETFs will fluctuate with the price of the underlying securities that make up the funds. In addition, ETFs have a trading risk based on the loss of cost efficiency if the ETFs are traded actively and a liquidity risk if the ETFs has a large bid-ask spread and low trading volume. The price of an ETF fluctuates based upon the market movements and may dissociate from the index being tracked by the ETF or the price of the underlying investments. An ETF purchased or sold at one point in the day may have a different price than the same ETF purchased or sold a short time later.

#### Bond Risks

Bonds are subject to specific risks, including the following: (1) interest rate risks, i.e. the risk that bond prices will fall if interest rates rise, and vice versa, the risk depends on two things, the bond's time to maturity, and the coupon rate of the bond. (2) reinvestment risk, i.e. the risk that any profit gained must be reinvested at a lower rate than was previously being earned, (3) inflation risk, i.e. the risk that the cost of living and inflation increase at a rate that exceeds the income investment thereby decreasing the investor's rate of return, (4) credit default risk, i.e. the risk associated with purchasing a debt instrument which includes the possibility of the company defaulting on its repayment obligation, (5) rating downgrades, i.e. the risk associated with a rating agency's downgrade of the company's rating which impacts the investor's confidence in the company's ability to repay its debt and (6) Liquidity Risks, i.e. the risk that a bond may not be sold as quickly as there is no readily available market for the bond.

#### Mutual Fund Risks

The performance of mutual funds is subject to market risk, including the possible loss of principal. The price of the mutual funds will fluctuate with the value of the underlying securities that make up the funds. The price of a mutual fund is typically set daily therefore a mutual fund purchased at one point in the day will typically have the same price as a mutual fund purchased later that same day.

**Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.**

### **Item 9 – Disciplinary Information**

---

**There are no legal, regulatory or disciplinary events involving Pelican Invests or its owner.** Pelican Invests values the trust Clients place in the Advisor. The Advisor encourages Clients to perform the requisite due diligence on any advisor or service provider that the Client engages. The backgrounds of the Advisor or Advisory Persons are available on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor's firm name or CRD# 329771.

### **Item 10 – Other Financial Industry Activities and Affiliations**

---

#### Pelican Gift Inc.

Pelican Gift Inc. ("Pelican Gift") is affiliated and under common control with the Advisor. Pelican Gift provides online self-help solutions for common education saving and planning needs and related educational content. Website visitors of Pelican Gift may be referred to the Advisor for investment advisory services. Clients are under no obligation to utilize the services of Pelican Gift or the Advisor.

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

---

Pelican Invests, LLC  
69 Charlton Street, New York, NY 10014  
Phone: 347-450-1767  
[www.PelicanInvests.com](http://www.PelicanInvests.com)



---

## **A. Code of Ethics**

Pelican Invests has implemented a Code of Ethics (the "Code") that defines the Advisor's fiduciary commitment to each Client. This Code applies to all persons associated with Pelican Invests ("Supervised Persons"). The Code was developed to provide general ethical guidelines and specific instructions regarding the Advisor's duties to each Client. Pelican Invests and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of Pelican Invests's Supervised Persons to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code covers a range of topics that address employee ethics and conflicts of interest. To request a copy of the Code, please contact the Advisor at 347-450-1767 or via email at [Hello@PelicanInvests.com](mailto:Hello@PelicanInvests.com).

## **B. Personal Trading with Material Interest**

Pelican Invests allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Pelican Invests does not act as principal in any transactions. In addition, the Advisor does not act as the general partner of a fund, or advise an investment company. Pelican Invests does not have a material interest in any securities traded in Client accounts.

## **C. Personal Trading in Same Securities as Clients**

Pelican Invests allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities that are recommended (purchase or sell) to Clients presents a conflict of interest that, as fiduciaries, must be disclosed to Clients and mitigated through policies and procedures. As noted above, the Advisor has adopted the Code to address insider trading (material non-public information controls); gifts and entertainment; outside business activities and personal securities reporting. When trading for personal accounts, Supervised Persons have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material non-public information. This risk is mitigated by Pelican Invests requiring reporting of personal securities trades by its Supervised Persons for review by the Chief Compliance Officer ("CCO"). The Advisor has also adopted written policies and procedures to detect the misuse of material, non-public information.

## **D. Personal Trading at Same Time as Client**

While Pelican Invests allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades are typically aggregated with Client orders or traded afterwards. **At no time will Pelican Invests, or any Supervised Person of Pelican Invests, transact in any security to the detriment of any Client.**

---

## **Item 12 – Brokerage Practices**

### **A. Recommendation of Custodian[s]**

Pelican Invests does not provide investment management services and therefore does not require the use of any particular broker-dealer/custodian (herein collectively a "Custodian"). Clients are free to use any particular Custodian or other service provider to execute their transactions and they are responsible for negotiating any terms or arrangements for their account[s]. The Advisor does not recommend a particular broker-dealer/custodian and is not obligated to conduct due diligence of the Client's selected Custodian[s] or service provider[s], seek better execution services or prices from any provider, or aggregate Client transactions for trade execution. Since Client transactions are completed at a service provider of the Client's choice, Clients may pay more for transaction or experience wider price spreads.

**1. Soft Dollars** - Soft dollars are revenue programs offered by broker-dealers/custodians whereby an advisor enters into an agreement to place security trades with a broker-dealer/custodian in exchange for research and other services. Pelican Invests does not participate in soft dollar programs sponsored or offered by any broker-dealer/custodian.



**2. Brokerage Referrals** - Pelican Invests does not receive any compensation from any third party in connection with the recommendation for establishing an account.

**3. Directed Brokerage** - As noted above, the Advisor does not manage Client accounts. All Clients are responsible for engaging their own Custodian and/or other service providers, as appropriate. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor's own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client's account[s]).

#### **B. Aggregating and Allocating Trades**

The Advisor does not have discretionary trading authority over Client account[s] and therefore does not aggregate securities purchases or sales.

### **Item 13 – Review of Accounts**

---

Pelican Invests does not provide investment management services and therefore do not have access to Client accounts to conduct periodic reviews.

### **Item 14 – Client Referrals and Other Compensation**

---

#### **A. Compensation Received by Pelican Invests**

Pelican Invests is a fee-based advisory firm, that is compensated solely by its Clients and not from any investment product. Pelican Invests does not receive commissions or other compensation from product sponsors, broker-dealers or any un-related third party. Pelican Invests may refer Clients to various unaffiliated, non-advisory professionals (e.g. attorneys, accountants, estate planners) to provide certain financial services necessary to meet the goals of its Clients. Likewise, Pelican Invests may receive non-compensated referrals of new Clients from various third-parties.

#### **B. Compensation for Client Referrals**

The Advisor does not compensate, either directly or indirectly, any persons who are not supervised persons, for Client referrals.

### **Item 15 – Custody**

---

Pelican Invests does not accept or maintain custody of any Client accounts.

### **Item 16 – Investment Discretion**

---

Pelican Invests does not have discretionary trading authority to manage securities on behalf of Clients.

### **Item 17 – Voting Client Securities**

---

Pelican Invests does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from their Custodian.

### **Item 18 – Financial Information**

---

Neither Pelican Invests, nor its management, have any adverse financial situations that would reasonably impair the ability of Pelican Invests to meet all obligations to its Clients. Neither Pelican Invests, nor any of its Advisory Persons, have been subject to a bankruptcy or financial compromise. Pelican Invests is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect advance fees of \$1,200 or more for services to be performed six months or more in the future.

# **Form ADV Part 2B – Brochure Supplement**

**for**

**Alexandra K. Bono  
CEO and Chief Compliance Officer**

**Effective: April 16, 2024**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Alexandra K. Bono (CRD# 7891794) in addition to the information contained in the Pelican Invests, LLC (“Pelican” or the “Advisor”, CRD# 329771) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Pelican Disclosure Brochure or this Brochure Supplement, please contact us at 347-450-1767 or by email at [Hello@pelicaninvests.com](mailto:Hello@pelicaninvests.com).

Additional information about Ms. Bono is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with her full name or her Individual CRD# 7891794.

## Item 2 – Educational Background and Business Experience

---

Alexandra K. Bono, born in 1987, is dedicated to advising Clients of Pelican as the CEO and Chief Compliance Officer. Ms. Bono earned a BBA from The George Washington University in 2010. Ms. Bono also earned an MBA from Columbia Business School in 2022. Additional information regarding Ms. Bono's employment history is included below.

### Employment History:

CEO and Chief Compliance Officer, Pelican Invests, LLC	05/2024 to Present
Assistant Director of Corporate Partnerships and Events, Whitney Museum of American Art	02/2014 to 06/2022
Associate VP, JP Morgan Chase and Co	01/2013 to 02/2014

## Item 3 – Disciplinary Information

---

***There are no legal, civil or disciplinary events to disclose regarding Ms. Bono.*** Ms. Bono has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Ms. Bono.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Ms. Bono.***

However, we do encourage you to independently view the background of Ms. Bono on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with her full name or her Individual CRD# 7891794.

## Item 4 – Other Business Activities

---

### Pelican Gift Inc.

Pelican Gift Inc. ("Pelican Gift") is affiliated and under common control with the Advisor. Ms. Bono is the Owner of Pelican Gift. Pelican Gift provides online self-help solutions for common education saving and planning needs and related educational content. Website visitors of Pelican Gift may be referred to the Advisor for investment advisory services. Clients are under no obligation to utilize the services of Pelican Gift or the Advisor. Ms. Bono spends approximately 10% of her time per month in this capacity.

### Columbia University

Ms. Bono is also an Associate II at Columbia University. In this capacity, Ms. Bono provides academic and administrative support for the faculty at the Columbia University Business School. Additionally, Ms. Bono serves as a liaison between students to address logistical student concerns. Ms. Bono spends less than 5% of her time per month in this capacity.

## Item 5 – Additional Compensation

---

Ms. Bono has additional business activities where compensation is received that are detailed in Item 4 above.

## **Item 6 – Supervision**

---

Ms. Bono serves as the CEO and Chief Compliance Officer of Pelican. Ms. Bono can be reached at 347-450-1767.

Pelican has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Pelican. Further, Pelican is subject to regulatory oversight by various agencies. These agencies require registration by Pelican and its Supervised Persons. As a registered entity, Pelican is subject to examinations by regulators, which may be announced or unannounced. Pelican is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

## Privacy Policy

---

Effective: April 16, 2024

### Our Commitment to You

Pelican Invests, LLC ("Pelican Invests" or the "Advisor") is committed to safeguarding the use of personal information of our Clients (also referred to as "you" and "your") that we obtain as your Investment Advisor, as described here in our Privacy Policy ("Policy").

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. Pelican Invests (also referred to as "we", "our" and "us") protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

Pelican Invests does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Policy.

### Why you need to know?

Registered Investment Advisors ("RIAs") must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

### What information do we collect from you?

Driver's license number	Date of birth
Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number[s]	Income and expenses
E-mail address[es]	Investment activity
Account information (including other institutions)	Investment experience and goals

### What Information do we collect from other sources?

Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

### How do we protect your information?

To safeguard your personal information from unauthorized access and use we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client's personal information.

We require third parties that assist in providing our services to you to protect the personal information they receive from us.

## How do we share your information?

An RIA shares Client personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Do we share?	Can you limit?
<b>Servicing our Clients</b> We may share non-public personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting.	Yes	No
<b>Marketing Purposes</b> Pelican Invests does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where Pelican Invests or the client has a formal agreement with the financial institution. <b>We will only share information for purposes of servicing your accounts, not for marketing purposes.</b>	No	Not Shared
<b>Authorized Users</b> Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent[s] or representative[s].	Yes	Yes
<b>Information About Former Clients</b> Pelican Invests does not disclose and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our Clients.	No	Not Shared

## Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise this Policy and will provide you with a revised Policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

## Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at 347-450-1767 or via email at [Hello@PelicanInvests.com](mailto:Hello@PelicanInvests.com).