

Form ADV Part 2A Brochure

DASTA Investments LLC

March 15th, 2024

This brochure provides information about the qualifications and business practices of DASTA Investments LLC (“DASTA”). If you have any questions about the contents of this brochure (“Brochure”), please contact our chief compliance officer at Justin@dubapp.com. This information has not been approved or verified by the United States Securities and Exchange Commission (the “SEC”) or by any state securities authority.

Additional information about DASTA Investments LLC also is available on the SEC’s website at www.adviserinfo.sec.gov.

Registration with the SEC does not imply a certain level of skill or training.

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Item 2 Material Changes

This brochure amendment is made in connection with DASTA's annual updating requirement for 2024 and serves as an update to DASTA's brochure dated March 15th, 2023. This brochure contains routine annual updates and clarifying changes to the prior brochure:

- Item 4: relating to DASTA's advisory business, including removal of RIA related portfolios, references to User created portfolios that are outside of the scope of advisory services, removal of self-directed trading section, and to reflect DASTA's relationship with introducing broker dealer, DASTA Financial, LLC;
- Item 5: clarifying changes to reflect that DASTA does not currently charge for its advisory services, but retains the right to charge a management fee when it deems appropriate;
- Item 7: relating to the addition of a minimum deposit amount of \$100;
- Item 8: relating to the method of analysis and removal of a qualification review and removal of certain risks not relevant to DASTA such as digital assets risk; and
- Item 10 & 12: relating to DASTA's relationship with DASTA Financial, LLC as introducing broker dealer.

As of December 31, 2023, DASTA did not have any client assets under management.

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Item 4 Advisory Business

DASTA Investments LLC ("**DASTA**") is an investment adviser with its principal place of business in New York, New York. DASTA is a wholly owned subsidiary of DASTA Incorporated, a Delaware corporation. Steven Wang is the principal control person of DASTA Incorporated.

DASTA is eligible to register as an investment adviser with the SEC as an internet adviser pursuant to Rule 203A-2(e) of the Investment Advisers Act of 1940, as amended, due to its advisory business being conducted exclusively through a mobile application owned by DASTA Incorporated (collectively, the "**dub App**").

Advisory Services

DASTA exclusively provides investment advisory and discretionary portfolio management services through the dub App to individual users ("**DASTA Users**"), who are natural persons. Within the dub App, DASTA Users can employ filtering and search tools to discover and invest in proprietary investment strategies managed by DASTA ("**Premium Portfolios**"), or other DASTA User portfolios.

It's important to emphasize that when a DASTA User allocates assets to mirror the trading activity of another DASTA User's portfolio, DASTA Incorporated employs its proprietary technology. This technology enables a self-directed trade through the Firm's introducing broker dealer, **DASTA Financial, LLC ("Introducing Firm")**, effectively replicating (or "Copy" / "Copying") the DASTA User's chosen portfolio in their own account. DASTA Users maintain complete control and discretion when it comes to deciding whether to replicate one or more portfolios within the dub App.

DASTA does not provide financial planning services or give tax or legal advice. DASTA Users are urged to consult with his or her own advisors with respect to the legal, tax, regulatory, financial, and accounting consequences of an investment in any Premium Portfolio.

User Profiles and Risk Scoring

The dub App also gathers and evaluates information provided by each DASTA User, encompassing details such as age, income, investment objectives, investment horizon, risk tolerance, and other pertinent information utilized by DASTA to construct a comprehensive user profile, referred to as the "**User Profile**." This User Profile may incorporate a risk tolerance score, which is exclusively determined based on responses provided by DASTA Users during the creation of their profile.

It's important to note that DASTA Users are initially restricted from investing in Premium Portfolios that DASTA deems to have a higher risk rating than the DASTA User's risk tolerance score, creating what we term a "risk mismatch." Whenever a risk mismatch occurs, DASTA Users are promptly notified, preventing them from Copying the corresponding Premium Portfolio, unless such DASTA User acknowledges such risk mismatch and affirmatively agrees to continue with making an investment toward that Premium Portfolio.

In addition, DASTA Users hold the flexibility to update their User Profile at their discretion. Such updates may or may not result in a modification to the DASTA User's risk tolerance score. In all instances, DASTA Users bear sole responsibility for notifying DASTA of any alterations to their financial situation, investment objectives, risk tolerance, or investment constraints.

General Considerations

The dub App is a mobile and online investment and trading platform, designed to be a marketplace of investment ideas and provide access to DASTA Users to a wide variety of investment strategies. DASTA provides its advisory services primarily online, however DASTA customer support is available for telephone consultation as needed to provide a complete advisory experience to DASTA Users.

DASTA Users should be familiar with investing online and comfortable communicating with DASTA through electronic means. When DASTA Users agree to the terms of the dub App, they agree to receive all communications and documents electronically (via email or directly through the dub App). The dub App is not suitable for DASTA Users if they have limited access to internet or don't have the physical technology required to run the dub App.

It's important for DASTA Users to keep in mind that the dub App and any Premium Portfolios a DASTA User may invest in is only one component of their investment strategy. The dub App is not designed to provide financial planning services and is limited by the information a DASTA User provides during onboarding. Investing is inherently risky and may result in a total loss of your investment.

Copy Mechanics

When a DASTA User Copies a Premium Portfolio, DASTA sends corresponding automated trades reflecting the Premium Portfolio holdings directly to the Introducing Firm, who clears through third-party broker-dealer, Apex Clearing Corporation ("**Third Party Broker**"). If a Premium Portfolio that a DASTA User Copies changes, DASTA sends corresponding automated trade instructions to the Introducing Firm reflecting the Premium Portfolio changes. DASTA does not always reflect the trading activity in a Premium Portfolio. For instance, a DASTA User's may impose reasonable restrictions on investing in certain securities or types of securities. In those instances, DASTA will allocate the remaining weight pro-rata across all holdings in the Premium Portfolio.

When multiple DASTA Users Copy a Premium Portfolio, DASTA may, but is not required to, aggregate orders for the purchase and sale of securities to reflect the Premium Portfolio. In such instances, each DASTA User will receive their pro-rata allocation with the average price per unit.

Each DASTA User opens a brokerage account ("**Brokerage Account**") with the Introducing Firm who utilizes the Third Party Broker for execution, custodial and clearing services.

Premium Portfolio Availability

There are multiple instances where DASTA may cease the availability of a particular Premium Portfolio. For instance, DASTA seeks to make available only those Premium Portfolios that meet the diligence and performance requirements of DASTA. To the extent these requirements are not met, as determined by DASTA, DASTA may decide to remove the Premium Portfolio from the dub App. Where this is the case, DASTA will seek to provide DASTA Users with as much notice as reasonably practical prior to removing the Premium Portfolio from the dub App. Other reasons for removal of a Premium Portfolio from the dub App include death or incapacity or retirement of a supervised person. DASTA cannot guarantee the availability of any Premium Portfolio on the dub App.

The availability of a Premium Portfolio should not be considered by a DASTA User to be an endorsement or recommendation of its Premium Portfolio. Investing in securities involves inherent risks, and you should be prepared for the potential of losing money when you invest in securities.

Premium Portfolio Evaluation

Prior to a Premium Portfolio's availability on the dub App, DASTA conducts due diligence on each Premium Portfolio, both from a qualitative and quantitative perspective. DASTA's review includes but is not limited to the following:

- Strategy Evaluation: Review of a strategies exposure, constraints, case studies, risk-return profile, risk controls, and RIA decision making
- Quantitative Assessment: Performance History (vs Benchmark), risk adjusted returns, upside/downside capture, back testing, and other performance metrics

DASTA Users must rely on their own examination of the Premium Portfolio, including the merits and risks involved, before Copying any Premium Portfolio. DASTA does not endorse or recommend any Premium Portfolio for investment by a DASTA User. There is no guarantee that the objective of any or all Premium Portfolios will be achieved.

Item 5 Fees and Compensation

Currently, DASTA does not impose any fees for its advisory services. However, it is essential to note that DASTA reserves the right to introduce fees for its services in the future. If such fees are introduced, DASTA may implement an asset-based management fee, referred to as the "**Management Fee**," which can range from 0.25% to 3% annually, calculated based on the market value of the assets allocated by the DASTA User for Copying specific Premium Portfolios. This Management Fee is computed daily and billed on a monthly basis in arrears.

The market value of an investment is determined using data sourced from the Third-Party Broker. To collect the Management Fee, DASTA will issue instructions to the Third-Party Broker, and the fee will be deducted directly from the DASTA User's account.

DASTA may, from time to time, vary or waive fees in its sole discretion. DASTA may amend its fee schedule at any time by giving thirty (30) days advance written notice to the DASTA User. Although DASTA believes its fees are competitive, DASTA Users should be aware that lower fees for comparable services may be available from other sources.

DASTA Users should also understand that the fee range discussed above is specific to what DASTA charges and does not include certain charges imposed by third parties such as custodial fees by the Introducing Firm or the Third-Party Broker and exchange traded fund ("ETF") fees and expenses. DASTA User assets also may be subject to other fees and taxes on brokerage accounts and securities transactions. For investments in ETFs, clients may be charged internal management fees, distribution fee and other expenses, which are described in each funds' prospectus.

Item 6 Performance-Based Fees and Side-by-Side Management

This Item is not applicable as DASTA does not charge performance-based fees.

Item 7 Types of Clients

DASTA's clients consist of individuals, including High Net worth individuals. DASTA does not require a minimum account size for opening or maintaining a DASTA User account, however DASTA Incorporated does impose a \$100 minimum deposit size. Individuals may become DASTA clients by applying to open an account through the dub App. All required documents and disclosure are executed and presented in the dub App.

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

Methods of Analysis and Investment Strategies.

DASTA utilizes several methods to evaluate Premium Portfolios. DASTA evaluates Premium Portfolio initially and on an ongoing basis thereafter. Initially, DASTA will review relevant information about the Premium Portfolio through its diligence process. DASTA requires an internal review that includes the following:

- Strategy Evaluation: Review of a strategies exposure, constraints, case studies, risk-return profile, and risk controls
- Quantitative Assessment: Performance History (vs Benchmark), risk adjusted returns, upside/downside capture, back testing, and other performance metrics

DASTA will meet internally with its investment committee to determine whether to engage with a strategy as a Premium Portfolio.

If a strategy is approved and active on the dub App, DASTA will supervise and monitor the trading activity of the Premium Portfolio. DASTA maintains an internal quantitative evaluation tool, that evaluates Premium Portfolios on a real-time basis to determine whether the Premium Portfolio is deviating from its stated objective or has elevated levels of volatility or risk.

Material Risks

The following summary identifies certain material risks that apply with respect to DASTA's advisory services, the use of the dub App and certain common risks associated with mirroring one or more Premium Portfolio. The below should be carefully evaluated before investing through the dub App; however, the following does not intend to identify all possible risks of an investment through the dub App or of Copying a Premium Portfolio or provide a full description of the identified risks.

While DASTA will conduct initial and ongoing due diligence reviews on Premium Portfolios, DASTA Users are encouraged to research and understand the investment strategies and related risks of Premium Portfolios, prior to Copying them.

Certain Limitations on DASTA's Advisory Services. The dub App will provide DASTA Users with information and tools to allow users to research opportunities and better understand an investment's risks, time horizon, and expected returns, among other things. DASTA does not purport to provide DASTA Users with comprehensive investment advice, and DASTA's services to DASTA Users are subject to a number of limitations. The User Profile and resulting risk score is developed solely on information provided by DASTA Users. Accordingly, the dub App's ability to provide suitability analysis will depend upon DASTA Users providing accurate and complete information, and to update such information on an ongoing basis to the extent it becomes inaccurate. Inaccuracies or omissions in the algorithm will have a materially adverse effect on the dub App's ability to analyze whether a DASTA User's risk tolerance is in line with any given Premium Portfolio.

Activities of Premium Portfolios. DASTA will seek to make available only Premium Portfolio with the highest level of integrity. While the dub App may place limits on the types of strategies and investments offered by certain Premium Portfolios, DASTA is unable to predict market behavior and other factors outside of its control.

Nature of Investments. Portfolio managers of Premium Portfolio strategies have discretion in making investments on behalf of their respective Premium Portfolio(s), and investments could include a wide

spectrum of publicly available financial instruments. Many of these instruments and other assets will be subject to significant business, financial market or legal uncertainties. Prices of the financial instruments acquired for a Premium Portfolio may be volatile, and a variety of factors that are inherently difficult to predict, such as domestic or international economic and political developments, may significantly affect the results of the portfolio and the value of investments. No guarantee or representation is made that the investment objective of any or all Premium Portfolios will be achieved. Although certain Premium Portfolio strategies may attempt to mitigate market risk, there will be a significant degree of market risk relating to these investments.

Multiple Premium Portfolio. To the extent that a DASTA User were to allocate capital among multiple Premium Portfolios, each of which makes their trading decisions independently, it is theoretically possible that one or more of such Premium Portfolio may, at any time, take positions that may be opposite of positions taken by other Premium Portfolios. It is also possible that the Premium Portfolio may on occasion be competing with other Premium Portfolios for similar positions at the same time.

Equity Securities. Premium Portfolios primarily invest in equity securities. The value of equity securities fluctuates in response to issuer, political, market, and economic developments. Fluctuations can be dramatic over the short term as well as long term, and different parts of the market and different types of equity securities can react differently to these developments. For example, large cap stocks can react differently from small cap stocks, and "growth" stocks can react differently from "value" stocks. Issuer, political, or economic developments can affect a single issuer, issuers within an industry or economic sector or geographic region, or the market as a whole. Changes in the financial condition of a single issuer can impact the market as a whole. Terrorism and related geo-political risks have led, and may in the future lead, to increased short-term market volatility and may have adverse long-term effects on world economies and markets generally.

Lack of Diversification. Premium Portfolios will at times not be diversified among a wide range of types of securities, countries or industry sectors. Accordingly, client portfolios are subject to more rapid change in value than would be the case if the relevant DASTA User accounts maintained a wider diversification among types of securities and other instruments, geographic areas or sectors.

Illiquid Instruments. A Premium Portfolio may invest in relatively illiquid equity assets for as part of its strategy. Certain instruments may have no readily available market or third-party pricing. Reduced liquidity may have an adverse impact on market price and DASTA's ability to sell particular securities when necessary to meet liquidity needs or in response to a specific economic event, such as the deterioration of creditworthiness of an issuer. Reduced liquidity in the secondary market for certain securities may also make it more difficult for a DASTA User to obtain market quotations based on actual trades for the purpose of valuing a fund's portfolio.

Non-U.S. Securities. Foreign securities, foreign currencies, and securities issued by U.S. entities with substantial foreign operations can involve additional risks relating to political, economic, or regulatory conditions in foreign countries. These risks include fluctuations in foreign currencies; withholding or other taxes; trading, settlement, custodial, and other operational risks; and the less stringent investor protection and disclosure standards of some foreign markets. One or more of these factors can make foreign investments, especially those in emerging markets, more volatile and potentially less liquid than U.S. investments. In addition, foreign markets can perform differently from the U.S. market.

REITs. REITs in which a Premium Portfolio may invest are affected by underlying real estate values, which may have an exaggerated effect to the extent that REITs in which a Premium Portfolio invests concentrate investments in particular geographic regions or property types. Investments in REITs are also subject to the risk of interest rate volatility. Further, rising interest rates will cause investors in REITs to demand a higher annual yield from future distributions, which will in turn decrease market prices for equity securities issued by REITs. REITs are subject to risks inherent in operating and financing a limited number of projects because they are dependent upon specialized management skills, and have limited diversification. REITs depend generally on their ability to generate cash flow to make distributions to investors.

Arbitrage Transaction Risks. If the requisite elements of an arbitrage strategy are not properly analyzed, or unexpected events or price movements intervene, losses can occur. Moreover, arbitrage strategies often depend upon identifying favorable “spreads”, which can also be identified, reduced or eliminated by other market participants.

Hedging. There can be no assurances that a particular hedge is appropriate, or that certain risk is measured properly. Further, while a DASTA User account may enter into hedging transactions to seek to reduce risk, such transactions may result in poorer overall performance and increased (rather than reduced) risk for the investment portfolio(s) than if the DASTA User did not engage in any such hedging transactions.

Issuer-Specific Changes. Changes in the financial condition of an issuer or counterparty, changes in specific economic or political conditions that affect a particular type of security or issuer, and changes in general economic or political conditions can increase the risk of default by an issuer or counterparty, which can affect a security's or instrument's value. The value of securities of smaller, less well-known issuers can be more volatile than that of larger issuers. Smaller issuers can have more limited product lines, markets, or financial resources.

Relative Value Risk. In the event that the perceived mispricing underlying an investor's relative value trading positions were to fail to converge toward, or were to diverge further from, relationships expected by the investor, DASTA User accounts may incur a loss.

Quantitative Strategies Risk. Certain Premium Portfolios' investment programs may make considerable use of computer programs and involves highly complex mathematical calculations, such that the purchases or sales of investments for the model portfolio will be in accordance with computer-generated trades. Even if a Premium Portfolio strategy seeks to carry out such computer-generated calculations correctly, there can be no assurance that it will successfully be able to do so, nor does the use of a computer in collating information and operating a trading method assure the success of any such method. Errors, including but not limited to, inaccuracies in or corruption of data underlying trading algorithms, may occur with such complex calculations and computer programs which may be difficult to detect, and could have a material adverse effect on client profits. The magnitude of the effect of such errors may be exacerbated when the program results in a significant number of trades being executed over a short period of time. Furthermore, highly successful strategies and programs may become outdated over time, even before DASTA is able to recognize the shift and prevent substantial loss.

There may be times when human beings must alter, correct or update the data, models, or calculations used. The complexity of the programs used may make it more difficult for DASTA to detect any source of failure or error in such programs before material losses occur.

Cyber Security Breaches, Identity Theft and Fraud. DASTA's information and technology systems may be vulnerable to damage or interruption from computer viruses, network failures, computer and telecommunications failures, security breaches, power outages and catastrophic events such as fire, tornadoes, flood, hurricanes and earthquakes. The failure of these systems could cause significant interruptions in DASTA's operations and result in a failure to maintain the security or privacy of certain client information. In addition, DASTA is subject to the risk of fraud. While DASTA may deploy systems and procedures to detect such fraud, it may not be effective in preventing the risk of fraud in all circumstances.

Item 9 Disciplinary Information

This Item is not applicable.

Item 10 Other Financial Industry Activities and Affiliations

DASTA Financial LLC

An affiliate of DASTA, DASTA Financial LLC, maintains membership with the Financial Industry Regulatory Authority (“FINRA”) as a registered broker dealer. DASTA directs brokerage to DASTA Financial, LLC, its introducing broker dealer.

Apex Clearing Corporation (“APEX”)

APEX provides execution and clearing services to DASTA through its relationship with DASTA Financial, LLC. Certain Principals of APEX have entered into SAFE agreements with DASTA Incorporated., the parent company of DASTA Financial, LLC. This relationship may create an incentive for DASTA Financial, LLC, the affiliate of DASTA, to select APEX for brokerage services in respect of the execution and clearing services APEX provides. The APEX relationship is managed by several DASTA executives.

DASTA Investors

A limited number of Users have invested in DASTA Incorporated, the parent company of DASTA, and have created User portfolios within the dub App. DASTA Incorporated may provide the option to have these portfolios available to be copied, alongside Premium Portfolios.

In general, these relationships may create an incentive to highlight specific User portfolios or offer preferential terms to these Users. To address and mitigate this potential conflict of interest, DASTA manages this relationship through several executives. DASTA does not recommend any User portfolio within the dub App.

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

DASTA has adopted a Code of Ethics (the “Code”) that obligates DASTA and its access persons to put the interests of DASTA’s clients before their own interests and to act honestly and fairly in all respects in their dealings with clients. In addition to compliance with DASTA’s policies and procedures, all of DASTA’s personnel are required to comply with applicable federal securities laws. Users or prospective Users may obtain a copy of the Code by contacting Justin Ramirez (DASTA’s Chief Compliance Officer) at Justin@dubapp.com. See below for further provisions of the Code as they relate to the preclearing and reporting of securities transactions by DASTA’s access persons.

DASTA, or its related persons, in the course of their investment management and other activities (e.g., implementing, troubleshooting and monitoring the dub App and model portfolios), may come into possession of confidential or material nonpublic information about expected trading patterns of the Premium Portfolio Creators and about issuers, including issuers in which DASTA or its related persons have recommended to DASTA Users or invested. DASTA maintains and enforces written policies and procedures that prohibit the communication of such information to persons who do not have a legitimate need to know such information and to assure that DASTA is meeting its obligations to its clients and remains in compliance with applicable law. DASTA may possess certain confidential or material, nonpublic information that, if disclosed, might be material to a decision to buy, sell or hold a security, but DASTA will be prohibited from communicating such information to the client or using such information for the client’s benefit. In such circumstances, DASTA will have no responsibility or liability to the client for not disclosing such information to the client (or the fact that DASTA possesses such information), or not using such information for the client’s benefit, as a result of following DASTA’s policies and procedures designed to provide reasonable assurances that it is complying with applicable law.

DASTA requires its access persons to preclear only certain limited offerings and initial public offerings in their personal accounts with the Chief Compliance Officer, who may deny permission to execute the transaction if such transaction will have any adverse economic impact on one or more of the DASTA Users. All of DASTA’s access persons are required to disclose their securities transactions on a quarterly basis. In addition, the DASTA’s access persons are required to disclose the holdings in their personal accounts upon commencement of employment with the DASTA and on an annual basis thereafter. DASTA’s access persons are required to provide broker confirmations of each transaction in which they engage and annual certification of such transactions. DASTA’s access persons are also required to provide quarterly brokerage statements. Trading in the personal accounts of the DASTA’s access persons is reviewed by the Chief Compliance Officer and compared with transactions for client accounts and reviewed against the restricted securities list.

Item 12 Brokerage Practices

All DASTA Users open brokerage accounts through the Introducing Firm, with clearing and executing services provided by APEX Clearing Corporation. Not all investment advisers require their clients to direct brokerage. By directing brokerage to the Introducing Firm, DASTA may be unable to achieve most favorable execution of client transactions. This practice may cost clients more money. Such costs may include higher brokerage commissions (because DASTA may not be able to aggregate orders to reduce transaction costs) and less favorable execution of transactions.

DASTA will not receive research or other products or services other than execution from a broker-dealer or a third party in connection with client securities transactions (referred to as soft dollar benefits).

In directing brokerage to the Introducing Firm, DASTA and its related persons will not receive client referrals from the Introducing Firm.

Item 13 Review of Accounts

The dub App will review DASTA User allocations that Copy Premium Portfolios on an ongoing basis and notify DASTA Users when such allocations are inconsistent with DASTA User's User Profile. Premium Portfolio risk scores are calculated initially and periodically thereafter, and DASTA reviews DASTA User's User Profiles at least annually. Each DASTA User will receive account reports from the custodian of the account.

DASTA will prompt clients to review their answers to the User Profile questionnaire and restrictions on a quarterly basis. Annually, DASTA will contact clients to determine whether there have been any changes in their financial situation or investment objectives which may result in changes to their prior responses to the User Profile questionnaire.

DASTA's customer service representatives are available to discuss and explain investment decisions made for Premium Portfolios and may be contacted by email at support@dubapp.com or telephone (917) 261-2036.

Item 14 Client Referrals and Other Compensation

This Item is not applicable as DASTA does not receive an economic benefit from any persons for providing investment advice or other advisory services to clients. DASTA and its related persons do not directly or indirectly compensate any persons who is not its supervised person for client referrals.

Item 15 Custody

This Item is not applicable as DASTA will not have custody of DASTA User's funds or securities.

Item 16 Investment Discretion

DASTA offers portfolio management services on a limited discretionary basis, in which case DASTA places trades in a DASTA User's account invested in a Premium Portfolio without contacting the client prior to each trade to obtain the client's permission.

Through the execution of a Customer Agreement, DASTA's discretionary authority is solely limited to placing trades in accordance with a Premium Portfolio for which a DASTA User has sole discretion to Dub or un-Dub at any time on a self-directed basis.

Item 17 Voting Client Securities

DASTA does not have the authority to vote securities on behalf of DASTA Users. DASTA Users will receive their proxies or other solicitations directly from their custodian. Accordingly, DASTA Users are not able to contact DASTA with questions about a particular solicitation.

Item 18 Financial Information

This Item is not applicable.