

Part 2A of Form ADV: Firm Brochure

Item 1 Cover Page

Item 1 Cover Page

A. The cover page of your brochure must state your name, business address, contact information, website address (if you have one), and the date of the brochure.

Note: If you primarily conduct advisory business under a name different from your full legal name, and you have disclosed your business name in Item 1.B of Part 1A of Form ADV, then you may use your business name throughout your brochure.

B. Display on the cover page of your brochure the following statement or other clear and concise language conveying the same information, and identifying the document as a “brochure”:

This brochure provides information about the qualifications and business practices of [your name].

If you have any questions about the contents of this brochure, please contact us at [telephone number and/or email address]. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about [your name] also is available on the SEC’s website at www.adviserinfo.sec.gov.

C. If you refer to yourself as a “registered investment adviser” or describe yourself as being “registered,” include a statement that registration does not imply a certain level of skill or training.

Response to Item 1.A:

Name of Investment Advisor: Wall Street Investment Management, LLC

Business Address: 3507 Armfield Farm Dr, Chantilly, VA, 20151

Contact: Sriram Srinivasan

Phone: 703-728-3380

Website: www.wallStIM.com

Brochure Date: Dec 31, 2023

Response to Item 1.B:

This brochure provides information about the qualifications and business practices of Wall Street Investment Management, LLC. If you have any questions about the contents of this brochure, please contact us at 307-438-9746 or at 703-728-3380 and/or at sriram@WallStIM.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Additional information about Wall Street Investment Management, LLC also is available on the SEC’s website at www.adviserinfo.sec.gov.

Response to Item 1.C:

Item 1.C:

Wall Street Investment Advisor is a registered investment advisor in the State of Virginia and registration does not imply a certain level of skill or training.

Item 2 Material Changes

Item 2: Material Changes:

If you are amending your brochure for your annual update and it contains material changes from your last annual update, identify and discuss those changes on the cover page of the brochure or on the page immediately following

the cover page, or as a separate document accompanying the brochure. You must state clearly that you are discussing only material changes since the last annual update of your brochure, and you must provide the date of the

last annual update of your brochure.

Note: You do not have to separately provide this information to a client or prospective client who has not received a previous version of your brochure

Response to Item 2:

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Item 4 Advisory Business

Item 4 Advisory Business

A. Describe your advisory firm, including how long you have been in business. Identify your principal owner(s).

Notes: (1) For purposes of this item, your principal owners include the persons you list as owning 25% or more of your firm on Schedule A of Part 1A of Form ADV (Ownership Codes C, D or E). (2) If you are a publicly held company without a 25% shareholder, simply disclose that you are publicly held. (3) If an individual or company owns 25% or more of your firm through subsidiaries, you must identify the individual or parent company and intermediate subsidiaries. If you are an SEC-registered adviser, you must identify intermediate subsidiaries that are publicly held, but not other intermediate subsidiaries. If you are a state-registered adviser, you must identify all intermediate subsidiaries.

B. Describe the types of advisory services you offer. If you hold yourself out as specializing in a particular type of advisory service, such as financial planning, quantitative analysis, or market timing, explain the nature of that service in greater detail. If you provide investment advice only with respect to limited types of investments, explain the type of investment advice you offer, and disclose that your advice is limited to those types of investments.

C. Explain whether (and, if so, how) you tailor your advisory services to the individual needs of clients. Explain whether clients may impose restrictions on investing in certain securities or types of securities.

D. If you participate in wrap fee programs by providing portfolio management services, (1) describe the differences, if any, between how you manage wrap fee accounts and how you manage other accounts, and (2) explain that you receive a portion of the wrap fee for your services.

E. If you manage client assets, disclose the amount of client assets you manage on a discretionary basis and the amount of client assets you manage on a non-discretionary basis. Disclose the date “as of” which you calculated the amounts.

Note: Your method for computing the amount of “client assets you manage” can be different from the method for computing “assets under management” required for Item 5.F in Part 1A. However, if you choose to use a different method to compute “client assets you manage,” you must keep documentation describing the method you use. The amount you disclose may be rounded to the nearest \$100,000. Your “as of” date must not be more than 90 days before the date you last updated your brochure in response to this Item 4.E.

Response to Item 4.A:

A. Description of advisory firm, length of business and Principals:

Wall Street Investment Management (WSIM) is a limited liability company incorporated under the laws of Virginia. It has been operating a Virginia Registered Investment Advisor since Dec 2006 and is SEC registered since 2021. WSIM provides discretionary portfolio management services for individuals as well as corporations and manages investments in both exchange traded and over the counter securities. Additionally, WSIM advises a private investment company for a family and we do not solicit investors for that fund. Mr. Sriram Srinivasan, who is associated with and owns WSIM will provide its investment advisory services. Mr. Sriram Srinivasan is appropriately licensed, qualified, and authorized to provide advisory services on behalf of WSIM and is known as an Investment Adviser Representative (IAR).

General Information on Advisory Services and Fees

General Information on Advisory Services and Fees
WSIM does not represent, warranty, or imply that the services or methods of analysis employed by the Firm can or will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to market corrections or declines.

Response to Item 4.B:

B. Type of Advisory Services that WSIM offers, Primary Expertise.

WSIM primarily offers discretionary portfolio management services specializing in Global Macro strategies. This involves investing in stocks, stock options, exchange traded funds, foreign issuers, warrants, corporate debt, treasuries, negotiable certificates of deposit, municipal securities, mutual fund shares, options on securities that

are exchange traded as well as over the counter securities. WSIM uses its analysis of market conditions to invest long or short. All investment decisions may change daily.

In addition to the above, WSIM provides consulting services for acquisitions, quantitative analysis, algorithmic trading ideas and backtesting, investment scenario analysis, information technology services, etc.,

General Information on Advisory Services and Fees General Information on Advisory Services and Fees
WSIM does not represent, warranty, or imply that the services or methods of analysis employed by the Firm can or will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to market corrections or declines.

Response to Item 4.C:

C. Are Advisory Services tailored to individual clients? Can clients impose restrictions?

WSIM does not tailor its advisory services to the individual needs of clients. WSIM endeavors to enhance returns and mitigate risks. Portfolios of different clients may not necessarily carry similar positions at any point in time. WSIM, however, discusses strategies it adopts and its view on current market conditions by appointment. Clients may not impose restrictions on investing in certain securities or types of securities.

Response to Item 4.D:

D. Wrap Fee Program?

WSIM does not provide Wrap Fee program for its portfolio management services.

Response to Item 4.E:

E. Assets under Management.

As of Dec 31, 2023

Discretionary Assets under Management was : \$145,208,840.50 (approximately)

Non Discretionary Assets under Management was : \$ 0 million (approximately)

Item 5 Fees and Compensation

Item 5 Fees and Compensation

A. Describe how you are compensated for your advisory services. Provide your fee schedule. Disclose whether the fees are negotiable.

Note: If you are an SEC-registered adviser, you do not need to include this information in a brochure that is delivered only to qualified purchasers as defined in section 2(a)(51)(A) of the Investment Company Act of 1940.

B. Describe whether you deduct fees from clients' assets or bill clients for fees incurred. If clients may select either method, disclose this fact. Explain how often you bill clients or deduct your fees.

C. Describe any other types of fees or expenses clients may pay in connection with your advisory services, such as custodian fees or mutual fund expenses. Disclose that clients will incur brokerage and other transaction costs, and direct clients to the section(s) of your brochure that discuss brokerage.

D. If your clients either may or must pay your fees in advance, disclose this fact. Explain how a client may obtain a refund of a pre-paid fee if the advisory contract is terminated before the end of the billing period. Explain how you will determine the amount of the refund.

E. If you or any of your supervised persons accepts compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds, disclose this fact and respond to Items 5.E.1, 5.E.2, 5.E.3 and 5.E.4.

1. Explain that this practice presents a conflict of interest and gives you or your supervised persons an incentive to recommend investment products based on the compensation received, rather than on a client's needs. Describe generally how you address conflicts that arise, including your procedures for disclosing the conflicts to clients. If you primarily recommend mutual funds, disclose whether you will recommend "no-load" funds.

2. Explain that clients have the option to purchase investment products that you recommend through other brokers or agents that are not affiliated with you.

3. If more than 50% of your revenue from advisory clients results from commissions and other compensation for the sale of investment products you recommend to your clients, including assetbased distribution fees from the sale of mutual funds, disclose that commissions provide your primary or, if applicable, your exclusive compensation.

4. If you charge advisory fees in addition to commissions or markups, disclose whether you reduce your advisory fees to offset the commissions or markups.

Note: If you receive compensation in connection with the purchase or sale of securities, you should carefully consider the applicability of the broker-dealer registration requirements of the Securities Exchange Act of 1934 and any applicable state securities statutes.

Response to Item 5.A:

A. Advisory Fees and Fee Schedule Disclosure:

Advisory Fees

For non high networth investors, WSIM's fee for portfolio management services is equal to **one (1%)** percent of assets under management. For retirement accounts of non high networth investors, WSIM's fee for portfolio management services is equal to one (1%) percent of assets under management. The annual fee for portfolio management is generally billed daily based on assets under management on that day.

For Qualified Clients (defined in Item 6 of this brochure), the fees are negotiable.

Fees for the private investment company that WSIM advises is based on a custom private contract with the original owners of that company and no new investors, **besides the original owners' family members and businesses they own**, are solicited.

Performance Based Fees

This fee is disclosed under Item 6 of this brochure

Response to Item 5.B:

B. How Advisory fees are billed?

For non high networth investors, management fees are deducted from the client account daily. For Qualified Clients (defined in Item 6 of this brochure), billing method is negotiable and WSIM may bill monthly.

Response to Item 5.C

C. Other types of fees or expenses clients may pay in connection with advisory services:

In addition to Advisory fee charged by WSIM, clients will incur brokerage costs, exposure fees, margin interests, costs associated with cancellation of orders, interest and/or dividend costs on short positions that may be held and these will be deducted from the Client's account by the broker(s) with whom the orders are filled and/or portfolios held. Also, clients will incur expenses, placement fee, sales charges, management fee, performance incentives associated with purchasing and holding Mutual Funds or Exchange Traded Funds, private equity funds or other financial products. Please see brokerage section (Response to Item 12) for more information

General Information on Advisory Services and Fees General Information on Advisory Services and Fees
WSIM does not represent, warranty, or imply that the services or methods of analysis employed by the Firm can or will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to market corrections or declines.

Response to Item 5.D:

D. Prepaid Advisory Fees:

Not Applicable.

Response to Item 5.E:

E: Is WSIM or any of its supervised persons accept compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds?

This is Not applicable as WSIM or its supervised persons do not accept compensation for sale of securities or other investment products, including asset-based sales charges or services fees from the sale of mutual funds.

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

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

If you or any of your supervised persons accepts performance-based fees – that is, fees based on a share of capital gains on or capital appreciation of the assets of a client (such as a client that is a hedge fund or other pooled investment vehicle) – disclose this fact. If you or any of your supervised persons manage both accounts that are charged a performance-based fee and accounts that are charged another type of fee, such as an hourly or flat fee or an asset-based fee, disclose this fact. Explain the conflicts of interest that you or your supervised persons face by managing these accounts at the same time, including that you or your supervised persons have an incentive to favor accounts for which you or your supervised persons receive a performance-based fee, and describe generally how you address these conflicts.

Response to Item 6:

WSIM manages accounts with fixed fees only. Fees for the private investment company that WSIM advises is based on a custom private contract with the original owners of that company and no new investors, besides the original owners' family members, are solicited

Performance Based Fees

During year 2023, no performance based fee was charged to investors.

Item 7 Types of Clients

Item 7 Types of Clients

Describe the types of clients to whom you generally provide investment advice, such as individuals, trusts, Investment companies, or pension plans. If you have any requirements for opening or maintaining an account, such as a minimum account size, disclose the requirements.

Response to Item 7:

WSIM generally provides advise to Individuals, Investment Companies, **Trusts** and Corporations and there are certain conditions to opening an account.

Conditions for Managing Accounts:

Generally, WSIM requires a minimum of \$100,000.00 to open and maintain an account.

However, at the Firm's discretion, it may waive this requirement if the Client appears to have significant potential for increasing assets under management or if the account is tied to a larger client relationship. For example, WSIM may allow accounts of members of the same household to be aggregated where the Firm services accounts on behalf of minor children of current clients, individual and joint accounts for a spouse, and other types of related accounts.

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

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

A. Describe the methods of analysis and investment strategies you use in formulating investment advice or managing assets. Explain that investing in securities involves risk of loss that clients should be prepared to bear.

B. For each significant investment strategy or method of analysis you use, explain the material risks involved. If the method of analysis or strategy involves significant or unusual risks, discuss these risks in detail. If your primary strategy involves frequent trading of securities, explain how frequent trading can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

C. If you recommend primarily a particular type of security, explain the material risks involved. If the type of security involves significant or unusual risks, discuss these risks in detail.

Response to 8.A, 8.B, 8.C:

- A. Methods of Analysis: WSIM primarily offers discretionary portfolio management services specializing in Global Macro strategies. This involves investing in stocks, stock options, exchange traded funds, foreign issuers, warrants, corporate debt, treasuries, negotiable certificates of deposit, municipal securities, mutual fund shares, **futures contracts**, options on securities that are exchange traded as well as over the counter securities. WSIM uses its analysis of market conditions to invest long or short. The methods of analysis primarily include fundamental and technical analyses and all investment decisions may change daily.
- B. Investing in Global Macro Strategies involve significant risk of loss. The value of the investments we make will be influenced by complex and interrelated political, economic, financial and other factors that affect capital markets generally. Specifically, options strategies and investing on margin carry inherent leverage and losses may multiply exponentially. Investors will be exposed to many different risks including, but not limited to, interest rate, foreign exchange, time value, corporate and/or market risks. Additionally, WSIM's strategies involve frequent trading and consequently transactions costs like brokerage costs may impact overall performance. Owing to frequent and short term trading, all profits may be taxed as short term capital gains at ordinary income tax rates.
- C. We do not recommend a particular type of security nor do we fully diversify. The type of investments made and the associated risks are discussed above.

Item 9 Disciplinary Information

Item 9 Disciplinary Information

If there are legal or disciplinary events that are material to a client's or prospective client's evaluation of your advisory business or the integrity of your management, disclose all material facts regarding those events.

Items 9.A, 9.B, and 9.C list specific legal and disciplinary events presumed to be material for this Item. If your advisory firm or a management person has been involved in one of these events, you must disclose it under this Item for ten years following the date of the event, unless (1) the event was resolved in your or the management person's favor, or was reversed, suspended or vacated, or (2) you have rebutted the presumption of materiality to determine that the event is not material (see Note below). For purposes of calculating this ten-year period, the "date" of an event is the date that the final order, judgment, or decree was entered, or the date that any rights of appeal from preliminary orders, judgments or decrees lapsed.

Items 9.A, 9.B, and 9.C do not contain an exclusive list of material disciplinary events. If your advisory firm or a management person has been involved in a legal or disciplinary event that is not listed in Items 9.A, 9.B, or 9.C, but nonetheless is material to a client's or prospective client's evaluation of your advisory business or the integrity of its management, you must disclose the event. Similarly, even if more than ten years have passed since the date of the event, you must disclose the event if it is so serious that it remains material to a client's or prospective client's evaluation.

A. A criminal or civil action in a domestic, foreign or military court of competent jurisdiction in which your firm or a management person

1. was convicted of, or pled guilty or nolo contendere ("no contest") to (a) any felony; (b) a misdemeanor that involved investments or an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses;
2. is the named subject of a pending criminal proceeding that involves an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses;
3. was found to have been involved in a violation of an investment-related statute or regulation; or
4. was the subject of any order, judgment, or decree permanently or temporarily enjoining, or otherwise limiting, your firm or a management person from engaging in any investment-related activity, or from violating any investment-related statute, rule, or order

B. An administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which your firm or a management person

1. was found to have caused an investment-related business to lose its authorization to do business; or
2. was found to have been involved in a violation of an investment-related statute or regulation and was the subject of an order by the agency or authority
 - (a) denying, suspending, or revoking the authorization of your firm or a management person to act in an investment-related business;
 - (b) barring or suspending your firm's or a management person's association with an investment related business;
 - (c) otherwise significantly limiting your firm's or a management person's investment-related activities; or
 - (d) imposing a civil money penalty of more than \$2,500 on your firm or a management person.

C. A self-regulatory organization (SRO) proceeding in which your firm or a management person

1. was found to have caused an investment-related business to lose its authorization to do business; or
2. was found to have been involved in a violation of the SRO's rules and was: (i) barred or suspended from membership or from association with other members, or was expelled from membership; (ii) otherwise significantly limited from investment-related activities; or (iii) fined more than \$2,500.

Note: You may, under certain circumstances, rebut the presumption that a disciplinary event is material. If an event is immaterial, you are not required to disclose it. When you review a legal or disciplinary event involving your firm or a management person to determine whether it is appropriate to rebut the presumption of materiality, you should consider all of the following factors: (1) the proximity of the person involved in the disciplinary event to the advisory function; (2) the nature of the infraction that led to the disciplinary event; (3) the severity of the disciplinary sanction; and (4) the time elapsed since the date of the disciplinary event. If you conclude that the materiality presumption has been overcome, you must prepare and maintain a file memorandum of your determination in your records. See SEC rule 204-2(a)(14)(iii).

Response to 9.A, 9.B, 9.C:

WSIM has no legal or disciplinary events that are material to a client's or prospective client's evaluation of our advisory business or the integrity of our management and there exist no material fact to disclose.

Item 10 Other Financial Industry Activities and Affiliations

Item 10 Other Financial Industry Activities and Affiliations

A. If you or any of your management persons are registered, or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer, disclose this fact.

B. If you or any of your management persons are registered, or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities, disclose this fact.

C. Describe any relationship or arrangement that is material to your advisory business or to your clients that you or any of your management persons have with any related person listed below. Identify the related person and if the relationship or arrangement creates a material conflict of interest with clients, describe the nature of the conflict and how you address it.

1. broker-dealer, municipal securities dealer, or government securities dealer or broker
2. investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund," and offshore fund)
3. other investment adviser or financial planner
4. futures commission merchant, commodity pool operator, or commodity trading advisor
5. banking or thrift institution
6. accountant or accounting firm
7. lawyer or law firm
8. insurance company or agency
9. pension consultant
10. real estate broker or dealer
11. sponsor or syndicator of limited partnerships.

D. If you recommend or select other investment advisers for your clients and you receive compensation directly or indirectly from those advisers that creates a material conflict of interest, or if you have other business relationships with those advisers that create a material conflict of interest, describe these practices and discuss the material conflicts of interest these practices create and how you address them.

Response to Item 10.A:

Not applicable

Response to Item 10.B:

Not Applicable

Response to Item 10.C

Sriram Srinivasan, a managing person of WSIM, has a passive minority ownership of a stock broker (Bharathi Share Broking private limited), registered in Chennai, India. They are not registered in the United States of America and they can only accept client accounts for trading in India governed by local securities rules and regulations. Any referral that results in WSIM clients becoming clients of Bharathi Share Broking Private Limited may result in material benefit to Sriram Srinivasan in the form of increased dividends from that brokerage firm received on account of being a stockholder or increased valuation of that brokerage firm at the time of potential future sale. WSIM advises a private investment company with the only investors being the original owners' family and their small business entities. No new investors for that company, besides the original owners' family members, are solicited.

Response to Item 10.D:

Not applicable

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

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

A. If you are an SEC-registered adviser, briefly describe your code of ethics adopted pursuant to SEC rule 204A-1 or similar state rules. Explain that you will provide a copy of your code of ethics to any client or prospective client upon request.

B. If you or a related person recommends to clients, or buys or sells for client accounts, securities in which you or a related person has a material financial interest, describe your practice and discuss the conflicts of interest it presents. Describe generally how you address conflicts that arise.

Examples: (1) You or a related person, as principal, buys securities from (or sells securities to) your clients; (2) you or a related person acts as general partner in a partnership in which you solicit client investments; or (3) you or a related person acts as an investment adviser to an investment company that you recommend to clients.

C. If you or a related person invests in the same securities (or related securities, e.g., warrants, options or futures) that you or a related person recommends to clients, describe your practice and discuss the conflicts of interest this presents and generally how you address the conflicts that arise in connection with personal trading.

D. If you or a related person recommends securities to clients, or buys or sells securities for client accounts, at or about the same time that you or a related person buys or sells the same securities for your own (or the related person's own) account, describe your practice and discuss the conflicts of interest it presents. Describe generally how you address conflicts that arise.

Note: The description required by Item 11.A may include information responsive to Item 11.B, C or D. If so, it is not necessary to make repeated disclosures of the same information. You do not have to provide disclosure in response to Item 11.B, 11.C, or 11.D with respect to securities that are not "reportable securities" under SEC rule 204A-1(e)(10) and similar state rules.

Response to Item 11.A

Code of Ethics:

As investment advise for clients may create situations of conflicts of interest, WSIM has established the following restrictions in order to ensure its fiduciary responsibilities:

- Associated persons, or their immediate family members, shall not buy or sell securities for their personal portfolios where their decisions are derived in whole or in part, by reason of the associated person's employment, unless the information is also available to the investing public on reasonable inquiry.
- The Firm requires that all individuals must act in accordance with all applicable federal and state regulations governing registered investment advisory practices.
- Records will be maintained of all securities bought or sold by the Firm, associated persons of the Firm, and related entities.
- Neither WSIM nor its related persons are willfully allowed to buy or sell securities from its/their personal portfolios from/to clients' portfolios.
- If WSIM or a related person holds securities that are also recommended to clients, WSIM or the related person shall not willfully execute an opposing trade significant enough to move the market significantly in such recommended security in the portfolio(s) of WSIM or its related person, the same business day on which such conflicting security was recommended to its clients.
- Any individual not in observance of the above may be subject to disciplinary action.

The full text of WSIM's Code of Ethics is available to you upon request. In accordance with Section 204-A of the Investment Advisers Act of 1940, WSIM also maintains and enforces policies reasonably designed to prevent the misuse of material non-public information by WSIM or any person associated with WSIM.

Response to Item 11.B:

If WSIM or a related person recommends a security in which there is material financial interest, then it may result in a conflict of interest. Some examples and how they are addressed are narrated below:

Example 1: WSIM or a related person may be holding a security long or short while similar or opposing positions are recommended and/or traded in a client portfolio.

This conflict is addressed in the same manner as Item 11.C below. Please see Item 11.C below.

Example 2: WSIM may recommend to its clients investments in private companies in which WSIM or a related person may have partnership interest. In this instance, WSIM will disclose such conflicts in advance of such investments.

Example 3: WSIM may act as an investment advisor to investment companies that are also recommend to clients. This conflict is addressed by disclosing such a relationship in advance of any investment(s) being made by clients.

Response to Item 11.C:

If WSIM or its related person invests in the same securities (or related securities like warrants, options or futures), that WSIM or its related person recommends to client(s), then it may potentially benefit WSIM or its related person.

How conflict is addressed?

We believe recommending positions held by WSIM or its related persons may result in significant gains to WSIM or its related persons only if the size of the trades placed by WSIM in client portfolios is large enough to impact the market favorably. Since neither the size of the trades placed in Client portfolios nor the size of the trades placed in WSIM or its related persons' portfolios is large enough to move the market significantly, we do not think a conflict exists here.

Response to Item D:

If WSIM or a related person, buy or sells a security about the same time as is being executed for a client portfolio, this may pose a conflict resulting in higher profit or reduced losses for WSIM's or its related person's portfolio(s). This conflict will exist and is also addressed the same way as Item 11.C. Please see Item 11.C.

Item 12 Brokerage Practices

A. Describe the factors that you consider in selecting or recommending broker-dealers for client transactions and determining the reasonableness of their compensation (e.g., commissions).

1. Research and Other Soft Dollar Benefits. If you receive research or other products or services other than execution from a broker-dealer or a third party in connection with client securities transactions ("soft dollar benefits"), disclose your practices and discuss the conflicts of interest they create.

Note: Your disclosure and discussion must include all soft dollar benefits you receive, including, in the case of research, both proprietary research (created or developed by the broker-dealer) and research created or developed by a third party.

a. Explain that when you use client brokerage commissions (or markups or markdowns) to obtain research or other products or services, you receive a benefit because you do not have to produce or pay for the research, products or services.

b. Disclose that you may have an incentive to select or recommend a broker-dealer based on your interest in receiving the research or other products or services, rather than on your clients' interest in receiving most favorable execution.

c. If you may cause clients to pay commissions (or markups or markdowns) higher than those charged by other broker-dealers in return for soft dollar benefits (known as paying-up), disclose this fact.

d. Disclose whether you use soft dollar benefits to service all of your clients' accounts or only those that paid for the benefits. Disclose whether you seek to allocate soft dollar benefits to client accounts proportionately to the soft dollar credits the accounts generate.

e. Describe the types of products and services you or any of your related persons acquired with client brokerage commissions (or markups or markdowns) within your last fiscal year.

Note: This description must be specific enough for your clients to understand the types of products or services that you are acquiring and to permit them to evaluate possible conflicts of interest. Your description must be more detailed for products or services that do not qualify for the safe harbor in section 28(e) of the Securities Exchange Act of 1934, such as those services that do not aid in investment decision-making or trade execution. Merely disclosing that you obtain various research reports and products is not specific enough.

f. Explain the procedures you used during your last fiscal year to direct client transactions to a particular broker-dealer in return for soft dollar benefits you received.

2. Brokerage for Client Referrals. If you consider, in selecting or recommending broker-dealers, whether you or a related person receives client referrals from a broker-dealer or third party, disclose this practice and discuss the conflicts of interest it creates.

a. Disclose that you may have an incentive to select or recommend a broker-dealer based on your interest in receiving client referrals, rather than on your clients' interest in receiving most favorable execution.

b. Explain the procedures you used during your last fiscal year to direct client transactions to a particular broker-dealer in return for client referrals.

3. Directed Brokerage.

a. If you routinely recommend, request or require that a client direct you to execute transactions through a specified broker-dealer, describe your practice or policy. Explain that not all advisers require their clients to direct brokerage. If you and the broker-dealer are affiliates or have another economic relationship that creates a material conflict of interest, describe the relationship and discuss the conflicts of interest it presents. Explain that by directing brokerage you may be unable to achieve most favorable execution of client transactions, and that this practice may cost clients more money.

b. If you permit a client to direct brokerage, describe your practice. If applicable, explain that you may be unable to achieve most favorable execution of client transactions. Explain that directing brokerage may cost clients more money. For example, in a directed brokerage account, the client may pay higher brokerage commissions because you may not be able to aggregate orders to reduce transaction costs, or the client may receive less favorable prices.

Note: If your clients only have directed brokerage arrangements subject to most favorable execution of client transactions, you do not need to respond to the last sentence of Item 12.A.3.a. or to the second or third sentences of Item 12.A.3.b.

B. Discuss whether and under what conditions you aggregate the purchase or sale of securities for various client accounts. If you do not aggregate orders when you have the opportunity to do so, explain your practice and describe the costs to clients of not aggregating.

Response to Item 12.A

For Qualified Clients, brokerage platforms are chosen as recommended by such clients or in discussion with such clients.

For non-Qualified Clients (defined in Item 6 of this brochure), Interactive Brokers is chosen as the brokerage platform primarily because WSIM believes Interactive Brokers provide the best combination of ease of use, customer support, reporting capability, global access, low cost, execution and margin loan rates. Additionally, For WSIM's Global Macro strategies, Commissions and Margin Loan rates are comparable and in many instances lower than other popular retail brokerage platforms.

Details of Costing and Margin Loan Rates with comparison can be seen in Interactive Brokers website (www.interactivebrokers.com) under Institutional Account and then Costs Menu.

If the brokerage platform does not support over the counter securities or bonds, then other broker dealers may be used and this will be done in full discussions with clients and in such custom scenarios, the choice of broker dealer may not necessarily be the same for all clients.

Response to Item 12.A.1:

Research and Soft-Dollars: From Interactive Brokers, we do not receive any Research or other products or services. But we do receive analytics, news and portfolio related services and it can be seen on their website at <http://www.interactivebrokers.com>. For Qualified clients who recommended their own Broker-Dealers, we have access to research from such Broker-Dealers which aid us in making better investment decisions.

We do not have Soft-Dollar arrangements with any Broker-Dealer.

We may receive additional non-cash compensation from Broker/Dealers. Such compensation may not be tied to the sales of any products. Compensation may include such items as gifts valued at less than \$500 annually, an occasional dinner or ticket to sporting events.

Response to Item 12.A.1.a:

If a broker-dealer other than Interactive Brokers is used to execute client transactions, then commissions and mark-ups/mark-downs on client transactions are used to receive proprietary or third-party research from such Broker-Dealers. WSIM uses such research in aiding investment decision making process for clients.

Response to Item 12.A.1.b:

If WSIM recommends broker-dealers other than Interactive Brokers, then we would like to disclose that WSIM may have an incentive to select or recommend a broker-dealer based on our interest in receiving the research or other products or services, rather than on the clients' interest in receiving most favorable execution.

Response to Item 12.A.1.c:

Not Applicable as we do not receive Soft-Dollar benefits from broker-dealers.

Response to Item 12.A.1.d:

Not Applicable as we do not receive Soft-Dollar benefits from broker-dealers.

Response to Item 12.A.1.e:

From Broker-Dealers other than Interactive Brokers, we received proprietary and third party market research and economic analysis, hedge fund investment brochures, presentations and related subscription information and technical analysis of stocks, sectors or markets. Occasionally we also had/have access to market analysis or fund presentations by Fund managers. All of these products or services provide assistance in the investment decision making responsibilities of WSIM.

Response to Item 12.A.1.f:

Not Applicable as we do not receive Soft-Dollar benefits from broker-dealers.

Response to Item 12.A.2:

Brokerage of Client referrals:

WSIM or a related person does not receive client referrals from Broker-Dealers it recommends.

Response to Item 12.A.2.a: and 12.A.2.b:

Not applicable as WSIM does not receive client referrals from Broker-Dealers it recommends.

Response to 12.A.3, 12.A.3.a, 12.A.3.b:

Not applicable as WSIM does not have Directed Brokerage arrangements with Clients. Further WSIM does not recommend such arrangements.

Response to 12.B:

The firm does not aggregate orders amongst multiple clients as analyzing client portfolio composition, greeks, size, risk and market conditions take precedence over aggregation. We believe that the risks of aggregation outweigh potential benefits.

Item 13 Review of Accounts

Item 13 Review of Accounts

- A. Indicate whether you periodically review client accounts or financial plans. If you do, describe the frequency and nature of the review, and the titles of the supervised persons who conduct the review.
- B. If you review client accounts on other than a periodic basis, describe the factors that trigger a review.
- C. Describe the content and indicate the frequency of regular reports you provide to clients regarding their accounts. State whether these reports are written.

Response to Item 13.A:

Portfolio Values are generally monitored on a daily basis. However, the portfolio details are generally reviewed on a weekly basis. The entire portfolio is reviewed for any adverse changes in individual positions and the need to either enhance profits or reduce losses. Positions may then be added or closed and generally good till cancelled orders are placed. Review is conducted by the Chief Investment Officer, Sriram Srinivasan.

Response to Item 13.B:

Sometimes accounts are reviewed daily. This may depend on volatile market conditions, receipt of any macro-economic surprise or shock or sudden adverse change in portfolio value. Accounts of Qualified Clients (as defined in Item 6 of this brochure) are reviewed more than once weekly.

Response to Item 13.C:

Generally, daily, quarterly and annual reports are available online at the broker's site and accessible by clients and such reports are used by WSIM and the clients as the primary document for discussions regarding their accounts.

For investors with multiple brokerage accounts, WSIM helps consolidate the reports in an Excel Spreadsheet on a quarterly basis and if needed, on a more frequent basis.

For all investors, communication via email and telephone are encouraged quarterly, if not more frequently.

Item 14 Client Referrals and Other Compensation

Item 14 Client Referrals and Other Compensation

A. If someone who is not a client provides an economic benefit to you for providing investment advice or other advisory services to your clients, generally describe the arrangement, explain the conflicts of interest, and describe how you address the conflicts of interest. For purposes of this Item, economic benefits include any sales awards or other prizes.

B. If you or a related person directly or indirectly compensates any person who is not your supervised person for client referrals, describe the arrangement and the compensation.

Note: If you compensate any person for client referrals, you should consider whether SEC rule 206(4)-3 or similar state rules regarding solicitation arrangements and/or state rules requiring registration of investment adviser representatives apply.

Response to Item 14:

Not applicable as Client Referrals are not paid and there is no referral program in place.

Item 15 *Custody*

Item 15 Custody

If you have custody of client funds or securities and a qualified custodian sends quarterly, or more frequent, account statements directly to your clients, explain that clients will receive account statements from the broker-dealer, bank or other qualified custodian and that clients should carefully review those statements. If your clients also receive account statements from you, your explanation must include a statement urging clients to compare the account statements they receive from the qualified custodian with those they receive from you.

Response to Item 15:

Not applicable as WSIM does not have custody of client funds.

Item 16 Investment Discretion

Item 16 Investment Discretion

If you accept discretionary authority to manage securities accounts on behalf of clients, disclose this fact and describe any limitations clients may (or customarily do) place on this authority. Describe the procedures you follow

before you assume this authority (e.g., execution of a power of attorney).

Response to Item 16:

WSIM accepts discretionary authority to manage securities accounts on behalf of clients. Clients may not place any limitation on this authority. A power of attorney is generally needed for this purpose and it is included in the Investment Advisory Contract established between WSIM and the client.

Item 17 Voting Client Securities

Item 17 Voting Client Securities

A. If you have, or will accept, authority to vote client securities, briefly describe your voting policies and procedures, including those adopted pursuant to SEC rule 206(4)-6. Describe whether (and, if so, how) your clients can direct your vote in a particular solicitation. Describe how you address conflicts of interest between you and your clients with respect to voting their securities. Describe how clients may obtain information from you about how you voted their securities. Explain to clients that they may obtain a copy of your proxy voting policies and procedures upon request.

B. If you do not have authority to vote client securities, disclose this fact. Explain whether clients will receive their proxies or other solicitations directly from their custodian or a transfer agent or from you, and discuss whether (and, if so, how) clients can contact you with questions about a particular solicitation.

Response to Item 17:

Not applicable as WSIM does not accept authority to vote client securities. Clients receive proxies or other solicitations directly from their custodian or a transfer agent and if needed, Clients may contact us over phone for advise on corporate actions and regarding exercise of proxy voting rights.

Item 18 Financial Information

Item 18 Financial Information

A. If you require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance, include a balance sheet for your most recent fiscal year.

1. The balance sheet must be prepared in accordance with generally accepted accounting principles, audited by an independent public accountant, and accompanied by a note stating the principles used to prepare it, the basis of securities included, and any other explanations required for clarity.
2. Show parenthetically the market or fair value of securities included at cost.
3. Qualifications of the independent public accountant and any accompanying independent public accountant's report must conform to Article 2 of SEC Regulation S-X.

Note: If you are a sole proprietor, show investment advisory business assets and liabilities separate from other business and personal assets and liabilities. You may aggregate other business and personal assets unless advisory business liabilities exceed advisory business assets.

Note: If you have not completed your first fiscal year, include a balance sheet dated not more than 90 days prior to the date of your brochure.

Exception: You are not required to respond to Item 18.A of Part 2A if you also are: (i) a qualified custodian as defined in SEC rule 206(4)-2 or similar state rules; or (ii) an insurance company.

B. If you have discretionary authority or custody of client funds or securities, or you require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance, disclose any financial condition that is reasonably likely to impair your ability to meet contractual commitments to clients.

Note: With respect to Items 18.A and 18.B, if you are registered or are registering with one or more of the state securities authorities, the dollar amount reporting threshold for including the required balance sheet and for making the required financial condition disclosures is more than \$500 in fees per client, six months or more in advance.

C. If you have been the subject of a bankruptcy petition at any time during the past ten years, disclose this fact, the date the petition was first brought, and the current status.

If you are registering or are registered with one or more state securities authorities, you must respond to the following additional Item.

Response to Item 18.A.

Not applicable as fee prepayments are not solicited.

Response to Item 18.B:

Not applicable as no financial condition that is reasonably likely to impair WSIM's ability to meet contractual commitment to clients exist.

Response to Item 18.C:

Not applicable as WSIM has not been subject of a bankruptcy petition at any time during the past ten years.

Item 19 Requirements for State-Registered Advisers

Item 19 Requirements for State-Registered Advisers

A. Identify each of your principal executive officers and management persons, and describe their formal education and business background. If you have supplied this information elsewhere in your Form ADV, you do not need to repeat it in response to this Item.

B. Describe any business in which you are actively engaged (other than giving investment advice) and the approximate amount of time spent on that business. If you have supplied this information elsewhere in your Form ADV, you do not need to repeat it in response to this Item.

C. In addition to the description of your fees in response to Item 5 of Part 2A, if you or a supervised person are compensated for advisory services with performance-based fees, explain how these fees will be calculated. Disclose specifically that performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client.

D. If you or a management person has been involved in one of the events listed below, disclose all material facts regarding the event.

1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:

- (a) an investment or an investment-related business or activity;
- (b) fraud, false statement(s), or omissions;
- (c) theft, embezzlement, or other wrongful taking of property;
- (d) bribery, forgery, counterfeiting, or extortion; or
- (e) dishonest, unfair, or unethical practices.

2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:

- (a) an investment or an investment-related business or activity;
- (b) fraud, false statement(s), or omissions;
- (c) theft, embezzlement, or other wrongful taking of property;
- (d) bribery, forgery, counterfeiting, or extortion; or
- (e) dishonest, unfair, or unethical practices.

E. In addition to any relationship or arrangement described in response to Item 10.C. of Part 2A, describe any relationship or arrangement that you or any of your management persons have with any issuer of securities that is not listed in Item 10.C. of Part 2A.

Response to Item 19.A:

There is one executive officer and management person in WSIM and details are below:

Name: Sriram Srinivasan

Year of Birth: 1965

Formal Education:

- Series 3 (Commodity Trading Advisor) and Series 65 (Investment Advisor)
- Project Management Professional: 2006
- Java Programmer Certification: 2000
- Microsoft and Back Office Training at Microsoft Authorized Service Center: 1998
- Graduate Studies (One year of M.B.A Program at Mankato, MN): 1992
- Chartered Accountant: 1990
- Cost Accountant (intermediate): 1989
- B.S. Mathematics: 1985
- Diploma in Business Management: 1985

Business Background for the Previous Five Years:

- Wall Street Investment Management LLC, Managing Member, 12/2006 to Present
- TRIADATA Systems Inc., Director, 08/2001 to Present

Response to Item 19.B:

Mr. Sriram Srinivasan is actively engaged in operations of Triadata Systems, and Bharati ShareBroking (Private) Ltd for less than 10% of his time.

Response to Item 19.C:

Performance based fees have not been charged to any client in 2023.

Response to Item 19.D.1:

Not applicable

Response to 19.D.2:

Not applicable

Response to Item 19.E:

Not applicable as neither WSIM nor its management person(s) has any relationship with any issuer of securities.