

Remotiv

This Brochure provides information about some qualifications and business practices of Remotiv LLC, which also uses “Remotiv” and “Financial Soundings” as business names.

If you have questions about the contents of this Brochure, please call us (toll-free) 877-393-8222.

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 us also is available on the Internet at www.adviserinfo.sec.gov.

Registration as an investment adviser doesn’t imply any level of skill or training.

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To get our Brochure, Relationship Summary, Code of Ethics, privacy notice, website agreement, or another document, visit our website at www.Remotiv.com/disclosures, email us at info@Remotiv.com, telephone us at either number shown above, or send your request to us at the address shown above.

Date of this Brochure: March 27, 2024

2. Material Changes

There is no material change from our preceding Brochure dated March 24, 2023.

3. Table of Contents

Our Brochure follows the order and numbering of items and subitems in Form ADV's Part 2A. We include our Supplement as the last part of our Brochure. Our Supplement follows (as further explained there) the order and numbering of items in Form ADV's Part 2B. A first-level heading's text is as the Investment Advisers Act requires.

As further aids to readers, our Brochure includes many cross-references in its text, and a set of "Definitions and specially-used words", which begins at page 14.

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4. Advisory Business

We offer retirement-planning information, education, and asset-allocation investment advice. We offer this in different formats:

Investment Education. We provide information, which might include information general financial and investment information, information about an IRA's Investment Alternatives, and asset-allocation models.

Investment Advice. We provide non-discretionary advice about how you should invest your IRA. This advice includes an asset-allocation recommendation. Further, our advice might recommend a Fund for each asset class we recommend.

Our service is governed by our Agreement. An Agreement may impose restrictions and conditions beyond those described in our Brochure.

4.A About Remotiv

Many people never get around to retirement planning because of the time, effort, and costs involved. We make unbiased retirement-planning services accessible and affordable. What makes us unique is not only the ease-of-use of our services, but also their level of customization. Regardless of age, income, or marital status, we can help you find easy-to-understand solutions to some of your financial concerns.

We developed our *Retirement Readiness* services to improve communications to IRA Holders. We try to help you improve the probability that your IRA will accumulate enough retirement savings to help you enjoy more financial security for retirement.

Remotiv was formed in January 2007, and registered with the SEC in September 2008. Our leaders have experience with other investment-related businesses, mostly about retirement planning. Lee Tupper, our chief information officer, before he joined us had experience with software businesses. For information on the education and business experience of our people involved in forming the investment-advice models we use for our services, see page 17. Although a few persons are Owners, Robert C. Dughi is the only principal (25% or more) Owner.

4.B Services we offer

We offer our services only to (or about) Retirement Plans or IRAs. We offer services that people who work with Retirement Plans call Investment Education. Also, we offer asset-allocation Investment Advice.

Remotiv's retirement-readiness services

Our key services are about retirement readiness, showing you how likely it is that you would have enough retirement savings to produce a retirement income (from a combination of sources) that meets a specified ratio in replacing your working years' income.

Our *Retirement Readiness Analysis* can provide information specific to your personal situation:

- a personalized retirement wealth target;
- an analysis of your chances to meet that target;
- a shortfall you likely would have at retirement;
- specific changes you can make in your investment allocation and IRA contributions that can help reduce or eliminate your projected retirement shortfall.

Our asset-allocation education or advice (if provided) is limited to asset classes for which an IRA would invest in a Fund. If so provided by our Agreement, our asset-allocation education or advice is limited to a specified subset of the IRA's Investment Alternatives. Our advice about which Fund you should invest in

(if more than one Investment Alternative is available for the asset class) is limited to Funds that report information in a form used by our software and service providers.

Remotiv's retiree planning services

We might offer our *Retiree Planning* services to give you some guidance through retirement.

To complete the analysis, visit our Retiree Portal to add “outside” assets and retirement income sources, including:

- Social Security,
- defined-benefit pensions,
- other retirement plans' accounts,
- Individual Retirement Accounts,
- investments beyond retirement plans;

and for all of these a spouse's benefits, pensions, accounts, and other investments.

You may customize your spend-down calculation by adjusting an assumed life expectancy, and by setting a percentage for an intended legacy.

A change to the facts or assumptions described above triggers updated calculations on a personalized dashboard. This includes the spend-down matrix, organized by income source, and a new investment strategy recommendation.

4.C How we tailor our services

As long as we can work within the information, software, and data-processing constraints that result from our use of suppliers, we're willing to tailor our services to meet your preferences for your IRA within the constraints described in our Brochure.

About our investment advice scope

If we give advice, we limit our asset-allocation advice to Funds that are the IRA's Investment Alternatives. Further, a Financial Institution may direct us to limit our advice to a specified subset of the IRA's Investment Alternatives. If we give advice, you decide whether to follow our advice.

4.D Not a wrap-free program

None of our services involves a wrap-free program.

4.E Assets under our advice

As of the end of 2023, we provide our Investment Advice and Investment Education services for about 423,000 Individuals and IRA Holders with about \$21.5 billion. None of this is regulatory assets under management because our non-discretionary Investment Advice is not “continuous and regular supervisory or management services” as the SEC's instructions define that phrase.

5. Fees and Compensation

5.A Fees

We're compensated for our services by fees.

We have no set fee schedule; we negotiate our fee for each Agreement.

Our fee might be a fixed fee for each Portfolio Review or advice report. Our fee might be a percentage of assets under our, or another person's, advice. Our fee might be a combination of these and other measures.

5.B Ways to pay our fee

We never have authority to deduct our fee from an IRA's assets. Only you can pay our fee, direct your IRA to pay our fee, or permit another person to pay our fee.

There are a few ways to pay our fee.

You pay

You may pay our fee, paying it from your money without using the IRA's assets.

IRA pays

An IRA may pay our fee. To do so, you must have and use a power to instruct your IRA's trustee, custodian, or insurer to pay us.

Another service provider pays

Another person, if it is an investment or service provider regarding the IRA about which we provide our services, may pay our fee. We allow this only when we believe that the arrangement for indirect payment complies with Applicable Law, otherwise is reasonable, and you don't disapprove.

We're a subadviser or subcontractor

If we're a subadviser, supplier, or subcontractor, the Registered Investment Adviser, Financial Institution, or other service provider we work for pays our fee, except as otherwise agreed with the IRA Holder.

Your responsibility to check payments of our fees

Whichever of those ways you choose or permit, you should check that payments of our fee are proper and correct. Among other duties, you should check, especially if you permit someone beyond you or the IRA to pay our fee, that we're paid no more than we're due.

5.C Others' fees and expenses

Investing your IRA will incur fees and expenses of persons unrelated to us. Those fees and expenses are not our fees, and are in addition to our fee. If an IRA invests in a Fund, it will bear a share of the Fund's expenses. If an IRA uses a Financial Institution, it might incur or bear transaction fees, commissions, or other brokerage costs. An IRA contract might involve other fees and expenses.

5.D When we are paid

We don't require our fee in advance.

If you permit an investment or service provider to pay our fee from its personal resources, we and the other provider might have payment arrangements that relate to an aggregate of IRA Holders, allow tolerances for differences between anticipated and actual services, and involve reconciling differences over time and in the aggregate. But these arrangements do not allow an investment or service provider to use your IRA's assets to prepay us as long as six months or to pay us more than we're due.

5.E No commissions or sales compensation

Neither Remotiv LLC nor any of our Supervised Persons accepts compensation for the sale of securities or other investment products. That includes not accepting asset-based sales charges or service fees from the sale of mutual Funds.

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

We don't accept any performance fee—that is, a fee based on a share of capital gains on, or capital appreciation of, the assets under our advice.

7. Types of Clients

We offer services only for Retirement Plans, IRAs, or Financial Institutions. Because we don't open or maintain accounts, we have no minimum account size.

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

8.A Our analysis and investment strategy

Our services can help you decide how much to save for retirement, and how to invest your IRA.

How we form our investment advice

Our services use portfolio-optimization and “Monte Carlo” stochastic simulation methods to illustrate the contributions rates and investment mix that could help you increase the likelihood you would meet your retirement-planning goal.

Our advice is based on assumptions

Our math takes as given what you (and your IRA's service provider) tell us about:

- your age,
- when you would like to retire (or, if you didn't tell us, an assumed retirement age),
- your employment income,
- your current rate of contributions,
- your current retirement-savings balance,
- the current asset allocation of your IRA;
- your spouse's age,
- your spouse's employment income,
- your spouse's current rate of retirement-savings contributions,
- your spouse's current retirement-savings balance,
- the current asset allocation of your spouse's retirement savings.

Also, you may tell us about your attitudes about the relationships of risks and opportunities for investment returns. We use that information to set a risk tolerance.

We use an assumption about how long a person might live.

We estimate your Social Security retirement benefit.

Those facts and assumptions, contributions and your willingness to take investment risk are the key “drivers” of how likely it is that your contributions and IRA investments will help you achieve your retirement-planning goal. (If you don't tell us about your tolerance for investment risk, we assume a “medium” tolerance for whatever we don't estimate based on how many years there are until your desired or assumed retirement age.) We “put a number on” this probability by making assumptions about several different future investment scenarios, simulating what would happen under each, and expressing all this as a kind of weighted average. Of course, no one can predict the future. Our assumptions and simulations about future investment returns might not include all expenses charged against your IRA.

We offer several kinds of services; which service we provide regarding a particular IRA turns on what is provided by our Agreement (which might be an agreement with a Financial Institution or other service provider). Further, the scope or form of our advice might be limited by a Financial Institution's directions or instructions.

For example, if we suggest you invest in a Target-date Fund or a balanced Fund (rather than a mix of Funds, each of which invests for a particular asset category), that suggestion follows a Financial Institution's direction that we present investment recommendations in that form. Likewise, if we suggest you invest all or a substantial portion of your IRA in one Fund or portfolio, that suggestion follows a Financial Institution's direction that we present investment recommendations in that form.

Beyond these considerations, a Financial Institution may instruct us to limit our advice to a subset of the IRA's Investment Alternatives, or even to specified Funds.

Asset-allocation recommendation

For our asset-allocation recommendation, we do the math to find the mix of asset classes—using only those available with at least one Fund as the IRA's Investment Alternative—that, based on expected-return assumptions and simulations, might achieve a desired long-term investment return without taking more risk than you're willing to accept, or at the probability of "success" you asked us to illustrate. Our recommendations are only for your IRA.

Target-date Fund recommendation

A Financial Institution may select a service under which our advice is limited to which Target-date Fund (of those that are the IRA's Investment Alternatives) is suitable for you.

Instead of an asset-allocation recommendation or illustration that suggests using several Funds, we can select which target year of a set of Target-date Funds is your nearest fit following your date of birth and an assumed retirement age. Further, if your IRA's set of Target-date Funds includes more than one Fund for your illustrated target year, we can illustrate which of those Funds is your nearest fit based on your time horizon and individual retirement readiness derived from the information furnished to us.

Fund recommendations

Because our asset-allocation recommendations are about how much of your IRA you should allocate to each asset class, we recommend you "fill" the amount you invest in an asset class by choosing one or more diversified Funds for each asset class.

For our recommendations about particular Funds (rather than asset classes), we look only to the IRA's Investment Alternatives. Further, we restrict our analysis to Funds about which we readily can obtain sufficient data in a format that's usable by our software for our computer-based models. We may use our own methods, or those instructed by a Financial Institution. Beyond these considerations, a Financial Institution may instruct us to limit our advice to a subset of your IRA's Investment Alternatives, or even to specified Funds.

To learn about a Fund, including an explanation of its investment policies and methods, read the Fund's prospectus (including its profile or fact sheet). While we're responsible for our mathematical evaluation (using the weighting of factors you or a Financial Institution asked for), of a Fund's past performance, we're not responsible for any information furnished by, on behalf of, or about a Fund. A Fund's past performance doesn't predict its future performance.

We give advice; you decide

Although we try to make it easy, you decide. You may accept our recommendations, or may ignore our advice. You decide your contributions (if any) and investment directions.

Who's responsible

You're responsible for anything that results from your decision, choice, or direction. We're responsible only for our investment advice.

Investing in securities involves risks of loss that an investor should be prepared to bear.

Computer model

To form and present our advice, we use a computer model. Our computer model:

- (i) applies generally accepted investment theories that take into account the past returns of different asset classes over defined past periods;
- (ii) uses information about you, which might include age, life expectancy, retirement age, risk tolerance, other assets, other sources of income, and preferences about particular kinds of investments;
- (iii) uses prescribed objective criteria to provide asset-allocation portfolios comprised of the IRA's Investment Alternatives;
- (iv) operates in a way that's not biased in favor of (or against) any Fund;
- (v) takes into account your IRA's Investment Alternatives in recommending or deciding how you should invest your IRA; and is not inappropriately weighted in favor of, or against, any Fund.

8.B Risks of our investment strategy

Many people are familiar with a warning that an investment's past doesn't predict its future. Likewise, although there's some evidence to support the idea that, in the past, asset allocation was effective in diversifying risks, no one can predict the future.

Another risk is that we form our advice using facts, data, formulas, and software we license, or an independent investment adviser licenses, from unaffiliated information and service providers. There is a risk that a provider's service could become poor, or that a provider could end its license. However, there are many providers of the kinds of data and software we use, and we believe we'd be able to make other arrangements that meet our needs.

Our assumptions could be wrong. We use an independent investment adviser to form our capital-markets assumptions. But no one can predict the future. And no matter how smart and informed an adviser is, they can be wrong.

Some of our assumptions come from you. On our *Retirement Readiness Analysis*, look for the part captioned "Your Profile". It shows assumptions for your age, salary, and retirement age; and for inflation rate and desired income-replacement ratio. To change the retirement age or desired income-replacement ratio, go to our portal to enter the facts and assumptions you want and rerun the analysis. If your age is wrong, correct your date of birth in the IRA's records.

The projections or other information generated by our services about the likelihood of various investment outcomes are hypothetical, do not reflect actual investment results, and are not guarantees of future results.

A forecast is based on hypothetical assumptions, including forward-looking models about the economy and securities markets. No one can predict the future. Any forecast is hypothetical, does not reflect actual investment results, and is not a guarantee or indication of future results.

8.C Only Funds

As explained throughout this Brochure, we suggest filling an asset allocation using only Funds; we don't consider any other kind of investment. Here are some risks of that means of investing:

- Using these Funds could be an ineffective way to meet a desired asset allocation.
- Information we receive about a Fund could be wrong.

- A Fund's future investments could differ from what we assumed when we suggested the Fund.

8.D Temporary investment

A Financial Institution (not we) might invest an IRA under a temporary investment. We suggest you use your rights to direct your IRA's investment.

9. Disciplinary Information

There is no legal or disciplinary event that is material to a your evaluation of our advisory business or the integrity of our management.

10. Other Financial Industry Activities and Affiliations

10.A No broker-dealer registration

We are not a broker-dealer, and none of our management persons is a broker-dealer or a registered representative of a broker-dealer.

10.B No commodities registration

Neither Remotiv LLC nor any management person of it is registered (or has applied to register) as a futures commissions merchant, commodity pool operator, or commodity trading advisor, or as an associated person of such a business.

10.C No related person to disclose

We have no advisory Affiliate or other person under common control with us who or that is an accountant or lawyer, or is in a banking, insurance, securities, commodities, real estate, or other investment-related business this subitem calls us to disclose.

10.D No recommendation of another investment adviser

We don't select or recommend another investment adviser.

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

11.A Code of Ethics

We have a Code of Ethics. It includes standards of conduct we require of our Supervised Persons. It requires them to comply with Federal securities laws that apply to us. It requires those who have access to confidential information about Plan's Investment Alternatives to handle and report their personal securities transactions according to our procedures.

We furnish our Code of Ethics to each of our Supervised Persons, and we require each to give us a written confirmation that the Supervised Person received it. We require each of our Supervised Persons to report

any violation of our Code of Ethics to our chief compliance officer. But if a person believes that a violation involves our chief compliance officer, we permit a report to any Owner.

We furnish our Code of Ethics on any client's or prospective client's request.

11.B No conflict from recommending a security we have a stake in

We don't recommend a security in which we have, or a related person of us has, a material financial interest.

11.C No conflict from investing in the same securities we recommend

We don't recommend securities other than Fund shares. We don't invest in Fund shares, but our Supervised Persons might invest in Fund shares. Recognizing the limited scope of our Managed Accounts or Investment Advice (if any), a transaction (or the absence of a transaction) that results from our decision or recommendation could not meaningfully affect the value of any investor's shares or units in a Fund.

11.D No conflict from trading securities around the time of our recommendation

We don't recommend securities other than Fund shares. We don't invest in Fund shares, but our Supervised Persons might invest in Fund shares. Recognizing the limited scope of our Managed Accounts or Investment Advice (if any), a transaction (or the absence of a transaction) that results from our recommendation could not meaningfully affect the value of any investor's shares or units in a Fund.

12. Brokerage Practices

We don't execute, and we don't select or recommend a broker-dealer for, your transactions.

13. Review of Accounts

For Investment Education, we provide updated guidance, which may be in the form of a Portfolio Review, on the schedule agreed on. For non-discretionary Investment Advice, we provide updated advice, which may be in the form of a Portfolio Review, on the schedule agreed on. Usually, we won't make an Agreement that calls for Portfolio Reviews less often than once a year.

You monitor your use (if any) of our advice, and you monitor your IRA's investments. We don't keep or render accounts. We assume your IRA provides you statements at least quarter-yearly. But we have no responsibility or authority to supervise any IRA's administration.

14. Client Referrals and Other Compensation

14.A Ways to pay our fee

As explained under "Ways to pay our fee" at page 7, we may allow you to pay our fee, or allow your IRA indirectly to pay our fee. See "Another service provider pays" at page 7. We allow this only when we believe that the arrangement for indirect payment complies with Applicable Law, otherwise is reasonable, and you don't disapprove.

14.B Promoter

We may pay a person who or that isn't our employee for referring a Plan to us. We negotiate a distinct compensation arrangement with each promoter.

15. Custody

We don't have custody of your securities or money.

16. Investment Discretion

We do *not* have discretionary authority to manage your IRA. If we give advice, you decide whether to follow our advice.

17. Voting Client Securities

17.A We don't vote your investments

We don't have, and don't accept, authority to vote your securities.

17.B How you get proxies

Ask your IRA's service providers how you get proxies and other solicitations directed to beneficial owners.

18. Financial information

18.A No prepayment

We don't require or solicit prepayment of fees as long as six months. We don't permit prepayment of fees as long as six months. For information, see "When we are paid" at page 7.

18.B Our financial condition

We have no financial condition reasonably likely to impair our ability to meet our Agreements.

18.C No bankruptcy

We have not been the subject of a bankruptcy petition.

19. Requirements for State-Registered Advisers

We're registered with the SEC; this item doesn't apply to us.

20. Definitions and specially-used words

Affiliate

Means a person that controls us, that we control, or that is under common control with us.

Agreement

Means an agreement with us, under which you may use and someone pays for our service.

Applicable Law

Means only law that applies to us in offering or performing our service.

Brochure

Refers to a document we use to meet an Investment Advisers Act rule that we furnish a written disclosure statement that contains the information required by SEC Form ADV Part 2A&B.

Code of Ethics

Refers to a document we use to meet Investment Advisers Act rule 204A-1, which requires a written code of ethics that includes standards of business conduct we require of our Supervised Persons.

Financial Institution

Refers to a bank (including a trust company), broker-dealer, insurance company, insurance intermediary, Registered Investment Adviser, Recordkeeper, or other person that provides a service of or for any of those.

Fund

Means a collective trust fund, common trust fund, real estate investment trust, registered investment company, insurance company separate account, or any similar pooled investment.

Internal Revenue Code

Means the *Internal Revenue Code of 1986*.

This Federal law sets the Federal income tax and some other U.S. taxes, including some excise taxes.

Investment Advice

Refers to non-discretionary advice about how you invest your IRA. This advice includes an asset-allocation recommendation. Our advice might recommend a Fund for each asset class we recommend.

Investment Advisers Act

Means the *Investment Advisers Act of 1940*.

This Federal law governs how a person that renders investment advice for a fee may solicit and make agreements to give investment advice.

Investment Alternative

We use the coined term “investment alternative” to describe whatever form of investment an IRA provides as a choice on the “menu” for an IRA Holder to direct investment of the IRA.

Investment Education

Refers to information—which might include general financial and investment information, information about an IRA’s Investment Alternatives, and asset-allocation models—that is not investment advice that makes a person a fiduciary under Internal Revenue Code § 4975(e)(3)(B).

IRA, Individual Retirement Account

Refers to an Individual Retirement Account or Individual Retirement Annuity described in IRC § 408.

IRA Holder

Means a person who is the trustee’s, custodian’s, or insurer’s counterparty under an IRA. This person often is called the IRA’s owner (or, after an initial owner’s death, a successor owner or beneficiary).

Owner

Means a person who or that has a capital interest in us.

Plan

Refers to a Retirement Plan, as explained below.

Portfolio Review

Means a written report that usually includes our asset-allocation recommendation and may include other investment advice about your IRA.

Recordkeeper

Means the person that, whether as a Plan's or IRA's investment or service provider, maintains records of Plan Accounts, or of IRAs.

Registered Investment Adviser

Means a person (including a company, such as Remotiv LLC) when it is registered with the SEC (or with a State Securities Authority) under the Investment Advisers Act (or under a State's law regulating Investment Advisers).

Relationship Summary

Refers to a document we use to meet Investment Advisers Act rule 204-5, which sometimes might require us to deliver to a retail investor a document that follows Form ADV Part 3 (Form CRS).

Relevant Law

Includes Applicable Law and law that, even if it doesn't apply to us, is relevant for us to consider in offering or performing our services.

Retirement Plan

Refers to an employer's (or labor union's) retirement plan (including a 401(k), 403(b), or 457(b) plan). A Retirement Plan doesn't refer to an IRA not held under an employer's Plan.

SEC

Refers to the Securities and Exchange Commission, an authority of the United States government.

State Securities Authority

Refers to a State government's official that regulates some Investment Advisers not registered with the SEC. We have filed a notice with many States; but we're registered with the SEC.

Supervised Person

Means our Owner or employee, including a leased employee or nonemployee contractor who performs advisory functions for us.

Supplement

Refers to a part of our Brochure that describes some educational background and business experience of the people who manage us.

Target-date Fund

Means an Investment Alternative of the kind the U.S. Labor department describes as "[a]n investment fund product or model portfolio that applies generally accepted investment theories, is diversified so as to minimize the risk of large losses[,] and that is designed to provide varying degrees of long-term appreciation and capital preservation through a mix of equity and fixed-income exposures based on the [individual's] age, target retirement date (such as normal retirement age under the plan) or life expectancy." 29 C.F.R. § 2550.404c-5.

We, our, us

Refer to Remotiv LLC.

You, your

Refer to an IRA Holder who can decide the investment of the IRA Holder's IRA.

21. Brochure Supplement

This Supplement provides information about some of our people. It supplements the rest of our Brochure. Please email or telephone us if you have questions about the contents of this Supplement.

Although the SEC's instructions might not require us to furnish information on a person who has no direct contact with IRA Holders, we furnish information on our people involved in forming the investment-advice models we use for our services.

Each person described in this Supplement has his business address with us at our principal office. Its address and telephone numbers are shown on the first page.

Additional information about us also is available on the Internet at www.adviserinfo.sec.gov.

Date of this Supplement: March 27, 2024

To get our Brochure (including this Supplement), Relationship Summary, Code of Ethics, privacy notice, website agreement, or another document, visit our website at www.Remotiv.com/disclosures, email us at info@Remotiv.com, telephone us at either number shown on our Brochure's first page, or send your request to us at the address shown on our Brochure's first page.

Our Supplement follows the order of items in Form ADV's Part 2B. The information above on this page follows Part 2B's item 1, and the subitems below follow Part 2B's items 2 through 7.

21.A Education and business experience

We show each person's name, year of birth, formal education after high school, and business background for the past five years.

Robert Louis (Bobby) Dughi

Remotiv, LLC and its subsidiaries	Chief Executive Officer	2019
Remotiv, LLC and its subsidiaries	Vice-president and preceding positions	2006-2019
Ithaca College (MS)		2009
Ithaca College (BS)		2005
Year of birth		1981

Stephen Earl (Steve) Maschino

Remotiv, LLC and its subsidiaries	President	2006-
Ohio State University (attended)		1975-1979
Year of birth		1957

Tullius Cicero (Lee) Tupper

Remotiv, LLC and its subsidiaries	Chief Technology Officer	2008-
University of Georgia (BS)		1998
Year of birth		1975

Remotiv was previously known as Financial Soundings.

21.B No disciplinary information

There is no legal or disciplinary event that is material to your evaluation of any person named in this Supplement.

21.C Other business activities

Each person named in this Supplement is not engaged in any other investment-related business, and is not engaged in a business that calls for disclosure under this item.

21.D Additional compensation

We don't allow a Supervised Person to accept an economic benefit for providing our advice from a person other than us. Each of our Supervised Persons doesn't get compensation, based even in part, on an amount or number of sales or referrals.

21.E Supervision

We supervise our Supervised Persons according to our compliance procedures.

Because our investment advice is derived using facts, data, formulas, and software we get from unaffiliated suppliers, none of our people as an individual forms the advice we provide. Rather, our active Owners approve our arrangements with suppliers and form the computer models that provide our advice. Because we present our advice as reports from computer models, we monitor the investment advice we provide only to seek reasonable assurance that no Supervised Person made any written or oral statement other than as stated by a computer-generated report.

Bobby Dughi, our chief compliance officer, supervises himself, every individual named in this Supplement, and every Supervised Person. Bobby's telephone number is 678-393-8222.

21.F Requirements for State-registered Advisers

Because we're registered with the SEC, this item doesn't apply to us.