

# Tickeron, Inc. SEC Form ADV Part 2A ("Firm Brochure")

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This Firm Brochure ("Brochure") provides information about the qualifications and business practices of Tickeron, Inc. Tickeron, Inc. is registered with the United States Securities and Exchange Commission ("SEC") as an investment adviser. That registration does not imply a certain level of skill and training. If you have any questions about the contents of this Brochure, please contact us at 1.844.348.7267 and/or [by e-mail at tickeronsupport@tickeron.com](mailto:tickeronsupport@tickeron.com). The information in this Brochure has not been approved or verified by the SEC or by any state securities authority.

Additional information about Tickeron, Inc. is also available on the SEC's website at: [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**Item 2 - Material Changes**

This Brochure supersedes our last Brochure amendment filed March 29, 2018. There have been no material changes since our last Brochure filing.

However, other non-material changes not specified in this summary may have been made to this Brochure. Consequently, we encourage you to read this Brochure in its entirety.

## Item 3 - Table of Contents

Item 2 - Material Changes.....	2
Item 3 - Table of Contents.....	3
Item 4 - Advisory Business .....	4
Item 5 - Fees and Compensation .....	6
Item 6 - Performance Based Fees and Side-by-Side Management .....	6
Item 7 – Types of Clients.....	6
Item 8 - Methods of Analysis, Investment Strategies and Risk of Loss .....	6
Item 9 - Disciplinary Information .....	12
Item 10 - Other Financial Industry Activities and Affiliations .....	12
Item 11 - Code of Ethics, Participation or Interest in Client Transactions and Personal Trading .....	13
Item 12 - Brokerage Practices .....	13
Item 13 - Review of Accounts.....	13
Item 14 - Client Referrals and Other Compensation .....	13
Item 15 - Custody.....	14
Item 16 - Investment Discretion.....	14
Item 17 - Voting Client Securities .....	14
Item 18 - Financial Information .....	14

## **Item 4 - Advisory Business**

Tickeron, Inc. (hereinafter, “Tickeron”) is a privately-held Nevada corporation formed in January 2013 by Sergey Savastiouk and John Jacques. Messrs. Savastiouk and Jacques and SAS Worldwide, Inc. are the principal owners of Tickeron.

Tickeron provides investment advisory service through a secure website (“Website”) which can be found at [www.tickeron.com](http://www.tickeron.com). Specifically, Tickeron provides users with the ability to create and manage one or more hypothetical investment portfolio(s) of comprising stocks, bonds, exchange traded funds (“ETFs”), real estate investment trusts (“REITs”), cryptocurrency, and foreign exchange transactions (“Forex”).

Registered users (“Members” or “Clients”) undergo a registration process in terms of which said users create a profile and are each assigned a username and password for registered access to the Website.

The class of Members is further divided into Beginner Members, Intermediate Members, Expert Members, and Advisor Members. Each type of Member corresponds to a certain level of proficiency in making investments. Ideally said level of proficiency increases from low to high as follows: Beginner Member, Intermediate Member, Expert Member, Advisor Member. Generally, a Beginner Member has little or no investment experience; an Intermediate Member is someone with moderate investment experience; an Expert Member is someone with substantial investment experience; and an Advisor Member is someone who is registered as an investment adviser with a State or with the SEC. Members are required to self-classify themselves into one of the classes of Members, failing which they are classified as Beginner Members by default. Tickeron does not verify that Beginner, Intermediate, or Expert Members are properly classified into a class based on the Member’s level of investment proficiency, but does verify Advisor Members’ qualifications and proficiency. Expert Member and Advisor Members are allowed to sell investment advice to other Members as will be described. Elements of the investment advisory service include:

- **Portfolio Diversification Scores:** A portfolio’s “Diversification Score” allows a Member to determine whether said member’s portfolio is adequately diversified or if it needs additional diversification. The Diversification Score is generated by a proprietary, automated computer algorithm, which analyzes various inputs submitted by a Member, such as the length of investment term, risk tolerance and the Member’s existing portfolio.
- **Portfolio Allocation Tools:** The investment advisory service provides tools to generate a “Investment Allocation” and a “Trade Ideas” for a portfolio. The Investment Allocation is recommended for Members that reallocate portfolio holdings infrequently. The Trade Allocation is recommended for Members that reallocate portfolio holdings frequently. A portfolio’s Investment Allocation and/or Trade Allocation are generated by a proprietary, automated computer algorithm, which analyzes various inputs submitted by a Member, such

as the length of investment term, risk tolerance and the Member's existing portfolio. Based on a Diversification Score, Investment Allocation, and Trade Allocation for a portfolio, a Member may determine how or whether to change said portfolio by taking independent action or seeking investment advice from third parties.

- **MALL:** In addition to providing Members' portfolio(s)' with Diversification Score(s), Investment Idea(s) and/or Trade Idea(s), the Website also allows certain Members to interact with other members. In particular, the Website has a virtual "mall" (the "MALL"), which allows all Members to subscribe to publications and/or purchase investment-related products from Expert Members and Advisor Members. In addition, Advisor and Expert Members are allowed to offer advisory services to all Members through the MALL.
- **Webcasts:** An Expert Member and an Advisor Member are allowed to create a web conference room ("Webcast") to allow other Members to follow said Expert Member's or Advisor Member's trading activity by means of web-based screen sharing. Webcasts are enabled on a pay-per-view basis or free.
- **Investors Clubs:** An Intermediate Member, Expert Member and Advisor Member can each create a virtual group ("Investors Club") comprising other Members who are invited to join the Investors Club. The creator of an Investors Club is allowed to manage allocations of a Club Portfolio. The Website provides functionality to allow Members of an Investors Club to communicate between themselves using communication tools such as instant messaging. Said Members are each allowed to maintain a version of the Club Portfolio and to suggest their versions of Club Portfolio allocations by re-allocating their versions of the Club Portfolio. Members can make visible their personal portfolios to other Members of an Investor Club. Members of an Investor Club may view AI and Community predictions on securities that are a part of the Club Portfolio.
- **Member Profiles:** The Website allows each Member to maintain a Member Profile which is, in essence, a social media-style profile comprising posts corresponding to the Member's activities such as publishing an article in Blogs, creating a Webcast, etc. Members can view the profiles of other Members. A Member can also subscribe to be notified of updates from another Member.
- **Ticker Profile Screener:** Akin to Member profiles, Tickers may also have profiles ("Ticker Profiles"). A Ticker represents a tradable investment such as a stock, mutual fund, ETF, etc. A Member can browse the Ticker Profiles published on the Website. Each Ticker profile comprises information such as ticker market information, financial indicators, messages associated with the ticker, blog posts associated with the ticker, tweets about the ticker, AI and Community Trend Predictions for the ticker (see below)
- **Community Trend Predictions and Voting:** The Website provides functionality for Members to make predictions about price movements associated with a ticker or with a portfolio of tickers. The predictions may be captured through polling of Members to determine a Member's prediction. Said polling may be achieved through a voting feature whereby a Member is allowed to vote on whether the Member thinks that a ticker or portfolio of tickers is going to go up or down.
- **Academy:** The Website provides Academy wherein Members are able to communicate with each other and view articles about tickers and portfolios.
- **Patterns:** The Website provides access to a Pattern Search Engine which allows Members to receive Alerts of recognized patterns in their Inboxes and track the bookmarked securities.

Tickeron does not tailor its advisory services to the individual needs of Members and does not

require clients to impose restrictions on investing in certain securities or types of securities.

Tickeron does not participate in wrap fee programs.

Tickeron does not manage Member assets on a discretionary or non-discretionary basis and does not have custody of any Member assets.

## **Item 5 - Fees and Compensation**

Tickeron requires its Members to register with the Website prior to accessing and using the Website's features. Upon registration, Members may access and use the Website free of charge to create and manage (1) portfolios, (2) utilize the Diversification Score and the portfolio allocation tools, and (3) communicate with Other Members, and (4) purchase/sell items in the MALL. Tickeron fees are non-negotiable. Tickeron charges members a monthly subscription fee as follows:

Beginner Member – Free

Intermediate Member - \$7.95 per month in advance

Expert Member - \$8.95 per month in advance

Advisor Member – \$9.95 per month in advance

Pattern Search Engine as an additional subscription - \$19.95 per month in advance

Trend Search Engine as an additional subscription - \$9.95 per month in advance

Tickeron does not deduct fees from a Member's account or assets. However, a Member's credit card shall be charged a monthly fee, as described above.

Tickeron charges a 15% platform fee to Members conducting business using the MALL. The primary purpose of the MALL is to enable all Members to seek additional investment-related products, information and/or advice from Expert Members and/or Advisor Members.

Members can be charged fees in advance.

Except as provided in this Item 5, neither Tickeron, nor any of its officers or managers, accepts compensation for the sale of securities or any investment products.

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

Tickeron does not charge performance-based fees.

## **Item 7 – Types of Clients**

Tickeron has integrated several cutting-edge investment websites into a financial super-community, creating the ultimate destination for financial information and portfolio management. Tickeron Clients are generally individual investors.

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

The Tickeron Website employs a proprietary, automated computer algorithm, which analyzes various

inputs submitted by a Member, such as the length of investment term, risk tolerance, and existing portfolio. The algorithm was developed by Tickeron and continues to be refined. Tickeron's investment advice is limited to generating a Diversification Score, Investment Ideas and/or Trade Ideas for a Member's portfolio. Once a Member receives his or her portfolio's Diversification Score, Investment Ideas and/or Trade Ideas, the Member must determine how or whether to change his or her portfolio by taking independent action or seeking investment advice from third parties. The Members do not invest any assets with Tickeron and Tickeron has no discretionary or non-discretionary investment management authority over the Members' assets.

*Risk of Loss.* To the extent a Member seeks investment advice from a third party Advisor Member, such Member should understand all investing and trading activities risk the loss of capital. No assurance can be given that the investment activities of an account will achieve the investment objectives of such account or avoid losses. Direct and indirect investing in securities involves risk of loss that Members should be prepared to bear on any investments they make based upon information obtained from a third-party Advisor Member. Tickeron does not represent or guarantee that third-party Advisor Members' services or methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate Members from losses due to market corrections or declines. Third-party Advisor Members cannot offer any guarantees or promises that Members' financial goals and objectives will be met. Past performance is in no way an indication of future performance. It is important that Members understand the risks associated with investing in the types of investments listed above.

Except as may otherwise be provided by law, Tickeron or third-party Advisor Members are not liable to Members for:

- Any loss that Members may suffer by reason of any investment decision made or other action taken or omitted by third-party Advisors in good faith;
- Any loss arising from third-party Advisor's adherence to Member's instructions or the disregard of third-party Advisor's recommendations made to Members; or
- Any act or failure to act by a third-party Advisor or other third-party to Member accounts.

The information included in this Brochure does not include every potential risk associated with an investment strategy, technique or type of security applicable to a particular Member account. Members are encouraged to ask questions regarding risks applicable to a particular strategy or investment product and read all product-specific risk disclosures. It is a Member's responsibility to give a third-party Advisor complete information and to notify such third-party Advisor of any changes in financial circumstances or goals.

*A.I.DVISOR.* Tickeron offers non-discretionary investment advisory services to individuals through its proprietary service, known as A.I.DVISOR - (the "Advisor Service"). Clients subscribe to the Advisor Service by accessing Tickeron's website, registering for an account by supplying a username and password, agreeing to the terms of the Investment Services Agreement, Terms of Service, and User License, and paying the applicable fee. Under the terms of the Investment Services Agreement, Tickeron's investment advisory relationship with client lasts for the period client is using the Advisor Service.

Members may receive the following services:

- Investment or Trade recommendations;
- Pattern Search Engine;
- Trend Search Engine;
- Community Trend Predictions;
- MALL;
- Academy;
- Community; and
- Advisor – Client.

Access to the services is based on membership, which is sold on a subscription basis as described above in Item 5 – Fees and Compensation. The level of membership associated with a Client is intended to be correlated with the level of investment sophistication/experience of the Client, with Beginner representing the least sophisticated investor and Advisor representing the most sophisticated investor. Tickeron Website access to investment advisory services and the features of our Advisor Service are based on the level of membership. Members are required to select the level of membership most appropriate to them. Tickeron does not determine if the level of membership chosen by a Member is appropriate for the Member. Members who apply for Advisor membership are required to be Registered Investment Advisers. Tickeron will verify that a Member who chooses the Advisor Member membership level is a registered investment adviser by performing a broker check at FINRA and conducting additional due diligence as appropriate. Registration as an investment adviser does not imply a certain level of skill or training.

*Investment recommendations.* Members may use the Advisor Service to receive specific buy and sell recommendations to allocate the Member's assets among a limited universe of investment alternatives (mutual funds and other investments) available for investment to the Member. The Member's assets include cash, and one or more investment accounts for holding various asset classes. Members are required to specify the assets for which investment advice is required. Tickeron uses proprietary software in its investment advisory service platform, including software for which patents are pending, to analyze the Member's current holdings and the choices available for investment within the Member's account, including exposure to various asset classes, expenses, manager performance, risk, and tax-efficiency of each investment alternative. Due to the statistical nature of Tickeron's process, several potential portfolios will satisfy our criteria for an appropriate investment strategy. Tickeron may select the investment alternatives that populate the universe of available alternatives for the Member's account. Our investment advisory service platform uses proprietary artificial intelligence to generate investment advice and recommendations based on the following:

- *DivScore:* At the heart of the technology is the DivScore (Diversification Score), which is a number range of 400 to 850 that measures the risk/reward characteristics of a portfolio's equity allocation. Through the Advisor Service, Members may view the DivScore for their portfolio, and compare it to DivScore associated with various professional and computer-generated portfolios. The DivScore may be used to gauge the quality of a portfolio's equity selections and the quality of a portfolio's allocation.
- *Asset Allocator:* Asset Allocator is a feature which allows Members to implement sector rotations in a timely manner. Additionally, Members can set up an easy to use yet



sophisticated alert system that will notify them when and how to rebalance their portfolios.

- *Wizards for Beginners:* A.I. Wizards use artificial intelligence to provide automated investment tools. A.I. Wizards may be used to calculate the DivScore for an investment account, generate investment ideas, and allocation ideas.

*Pattern Search Engine.* Tickeron has created algorithms that identify patterns of most known types, and it notifies users according to their preferences. These detailed notifications will also provide client supporting information, such as pattern confidence levels and historical statistics. This allows client to monitor the pattern's evolution, bookmark favorites, and to take action in trading/brokerage accounts to benefit from the forecasted price movements.

*Trend Search Engine.* Trend trading is an investment strategy based on the technical analysis of changing market prices, as opposed to using fundamental company analysis. Investors who use a trend-tracking strategy attempt to capitalize on shifting market trends by observing the current direction of a stock or an index, and using this to make buy or sell decisions. The trend-trader enters into a long position when a stock is trending upward, and conversely uses a short position when a stock is trending downward. Traders who apply this strategy rarely aim to forecast a specific price target - they simply 'ride' the trend until the pattern shifts or they've made sufficient profit. In the Tickeron System, users can subscribe to either the 'Community Trend Predictions' for Free or 'A.I. Trend Predictions,' depending on preferences. Our system also provides supporting information such as historical statistics and 'Prediction Confidence Levels,' which measure the level of conviction behind a pattern. Our system also allows the user to monitor price evolution, bookmark their favorites, and if so desired, take action on their trading platform to benefit from the predicted price movements.

*MALL.* Provides a place for buying and selling investment or trade ideas. The MALL includes the following products:

#### Member Products

- Passive Portfolios
- Active Portfolios
- Newsletters
- Reports
- Community Predictions

#### A.I. Products

Comprise patterns and trends with associated confidence levels generated using Tickeron's proprietary artificial intelligence software:

- Pattern Search Engine
- Trend Search Engine
- Portfolio Search Engine

*Academy.* Provides informational articles and training resources relating to investments,.

- Videos
- Articles
- Blogs

- Webcasts

*Community.* Provides tools and features for members to interact with each other. The tool and features include:

- Trend Predictions
- Friends
- Tickers
- Investors Clubs

There are certain additional risks associated when investing in securities that Members may face; including, but not limited to:

- **Market Risk:** Either the stock market as a whole, or the value of an individual company, goes down resulting in a decrease in the value of client investments. This is also referred to as systemic risk.
- **Legal and Regulatory Risks:** The regulation of the U.S. and non-U.S. securities and futures markets investment funds has undergone substantial change in recent years and such change may continue. In particular, in light of the recent market turmoil there have been numerous proposals, including bills that have been introduced in the U.S. Congress, for substantial revisions to the regulation of financial institutions generally. Some of the additional regulation includes requirements that private fund managers register as investment advisers under the Advisers Act and disclose various information to regulators about the positions, counterparties and other exposures of the private funds managed by such managers. Further, the practice of short selling has been the subject of numerous temporary restrictions, and similar restrictions may be promulgated at any time. Such restrictions may adversely affect the returns of Underlying Investment Funds that utilize short selling. The effect of such regulatory change on the accounts and/or the underlying investment funds, while impossible to predict, could be substantial and adverse.
- **Equity (stock) market risk:** Common stocks are susceptible to general stock market fluctuations and to volatile increases and decreases in value as market confidence in and perceptions of their issuers change. If a Member held common stock, or common stock equivalents, of any given issuer, Members would generally be exposed to greater risk than if Members held preferred stocks and debt obligations of the issuer.
- **Company Risk:** When investing in stock positions, there is always a certain level of company or industry specific risk that is inherent in each investment. This is also referred to as unsystematic risk and can be reduced through appropriate diversification. There is the risk that the company will perform poorly or have its value reduced based on factors specific to the company or its industry. For example, if a company's employees go on strike or the company receives unfavorable media attention for its actions, the value of the company may be reduced.
- **Risks Associated with Fixed Income:** When investing in fixed income instruments such as bonds or notes, the issuer may default on the bond and be unable to make payments. Further,

interest rates may increase and the principal value of your investment may decrease. Individuals who depend on set amounts of periodically paid income face the risk that inflation will erode their spending power.

- **ETF and Mutual Fund Risk:** When investing in an ETF or mutual fund, a Member will bear additional expenses based on the Member's pro rata share of the ETF's or mutual fund's operating expenses, including the potential duplication of management fees. The risk of owning an ETF or mutual fund generally reflects the risks of owning the underlying securities the ETF or mutual fund holds.
- **Options Risk:** Options on securities may be subject to greater fluctuations in value than an investment in the underlying securities. Purchasing and writing put and call options are highly specialized activities and entail greater than ordinary investment risks.
- **Liquidity Risk:** Certain assets may not be readily converted into cash or may have a very limited market in which they trade. Thus, Members may experience the risk that their investment or assets within their investment may not be able to be liquidated quickly, thus, extending the period of time by which Members may receive the proceeds from their investment. Liquidity risk can also result in unfavorable pricing when exiting (i.e. not being able to quickly get out of an investment before the price drops significantly) a particular investment and therefore, can have a negative impact on investment returns.
- **Management Risk:** Members investments will vary with the success and failure of their third-party Advisor's investment strategies, research, analysis and determination of portfolio securities. If a member implements their third-party Advisor's financial planning recommendations and their third-party Advisor's investment strategies do not produce the expected results, Members may not achieve their objectives.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to bonds.
- **Call Risk:** Bonds that are callable carry an additional risk because they may be called prior to maturity depending on current interest rates thereby increasing the likelihood that reinvestment risk may be realized.
- **Credit Risk:** The price of a bond depends on the issuer's credit rating, or perceived ability to pay its debt obligations. Consequently, increases in an issuer's credit risk, may negatively impact the value of a bond investment.
- **Inflation Risk:** When inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- **Speculation Risk:** The commodities markets are populated by traders whose primary interest is in making short-term profits by speculating whether the price of a security will go up or go down. The speculative actions of these traders may increase market volatility that could drive

down the prices of commodities.

- **Geopolitical Risk:** The world's natural resources are located in various continents and the jurisdiction over those commodities lies with sovereign governments, international companies, and many other entities. Disagreements over licensing agreements, tax structures, environmental concerns, employment of indigenous workers, and access to technology could negatively impact the price of commodities. Additionally, international disagreements over the control of natural resources could negatively impact the price of commodities.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Foreign Market Risk:** The securities markets of many foreign countries, including emerging countries, have substantially less trading volume than the securities markets of the United States, and securities of some foreign companies are less liquid and more volatile than securities of comparable United States companies. As a result, foreign securities markets may be subject to greater influence by adverse events generally affecting the market, by large investors' trading significant blocks of securities, or by large dispositions of securities, than as it is in the United States. The limited liquidity of some foreign markets may affect our ability to acquire or dispose of securities at a price and time it believes is advisable. Further, many foreign governments are less stable than that of the United States. There can be no assurance that any significant, sustained instability would not increase the risks of investing in the securities markets of certain countries.
- **Counterparty and Broker Credit Risk:** Certain assets will be exposed to the credit risk of the counterparties when engaging in exchange-traded or off-exchange transactions. There may be a risk of loss of assets on deposit with or in the custody of a broker in the event of the broker's bankruptcy, the bankruptcy of any clearing broker through which the broker executes and clears transactions, or the bankruptcy of an exchange clearinghouse.

## **Item 9 - Disciplinary Information**

None of Tickeron's employees, officers, or managers have been involved in any legal or disciplinary events that would be material to a Member's evaluation of the firm or its management.

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

None of Tickeron's employees, officers or managers are registered (and do not have any application pending to register) as a broker-dealer or a registered representative of a broker-dealer.

None of Tickeron's employees, officers or managers are registered or have an application pending to register as a futures commission merchant, commodity pool operator, commodity trading advisor or an associated person of any of the foregoing entities.

None of Tickeron's employees, officers or managers have relationships with related parties in the financial services industry that materially affect Tickeron's investment advisory service or any

Member.

None of Tickeron's employees, officers or managers recommend or select for any Member, or have other business relationships with, other investment advisers.

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

In order to avoid conflicts of interest and fulfill our fiduciary duties to our Members, Tickeron has adopted a Code of Ethics ("Code"), as required by Rule 204A-1 under the Investment Advisers Act of 1940 ("Advisers Act"). Tickeron's Code includes, among other things, provisions protecting Member confidentiality and prohibiting activities likely to create a conflict of interest. A complete copy of the Code is available upon request to Tickeron's Chief Compliance Officer at the address, telephone, or email address on the cover page of this Brochure. Tickeron or individuals associated with Tickeron may buy or sell securities identical to or different than those recommended to clients for their personal accounts. In addition, any related person(s) may have an interest or position in certain securities which may also be recommended to a client.

Neither Tickeron nor any related person recommends to Members securities in which Tickeron has a direct material financial interest. Tickeron does not have discretionary authority and may not trade Member assets on a nondiscretionary basis. Neither Tickeron nor any related person shall sell subscriptions to publications, investment-related products or advisory services in the MALL without fully and conspicuously disclosing such activity.

Tickeron is not in the business of investing in securities. Tickeron's officers and employees may purchase securities for their own accounts that are the same as securities in a Member's portfolio. However, because Members make their investment decisions independently and without any disclosure to Tickeron, any purchase of the same securities would be coincidental.

Tickeron does not invest in securities and does not buy or sell securities for Members. Any similarity in the timing of personal investments of Tickeron employees and the investments of Members made after acquiring a portfolio's Diversification Score, Investment Allocation and/or Trade Allocation is coincidental, immaterial and does not prejudice Members in any way.

## **Item 12 - Brokerage Practices**

Tickeron does not select or recommend broker-dealers for Member transactions.

## **Item 13 - Review of Accounts**

Tickeron's Member accounts are not regularly reviewed or monitored by Tickeron and are only reviewed by Tickeron upon the written request of a Member.

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

- A. Tickeron does not receive any benefits from third parties for providing Diversification Scores, Investment Allocations and/or Trade Allocations as well as Patterns. Although Tickeron receives fees from third parties Portfolio Models, Portfolio Subscriptions and Webcasts, these fees are not directly related to the Diversification Scores, Investment

Allocations and/or Trade Allocations.

- B. Tickeron may conduct marketing campaigns through advertising networks (e.g., Google AdWords/AdSense, or others). When visitors to the Website or potential Members are directed to the Website from an advertising network, Tickeron will compensate such network.

### **Item 15 - Custody**

Tickeron does not maintain custody of Member funds, securities, or other assets.

### **Item 16 - Investment Discretion**

Tickeron does not have discretionary authority to manage the Members' assets.

### **Item 17 - Voting Client Securities**

Tickeron does not have authority to vote Member securities and does not provide advice as to the voting of Member securities.

### **Item 18 - Financial Information**

Tickeron does not require or solicit any prepayment of more than \$1,200 in fees per Member six months or more in advance.

Tickeron is not aware of any financial condition that is reasonably likely to impair its ability to meet its contractual commitments to Members.

Tickeron has not been subject to a bankruptcy petition.