



Form ADV Part II

Full Company Name: Quovo, Inc.

SEC File Number: 801-70646

IRS EIN: 27-0564833

Date: 3-17-2014

This brochure provides information about the qualifications and business practices of Quovo, Inc. (hereinafter "Quovo"). Please contact, W. Lowell Putnam, CEO, if you have any questions about the contents of this brochure. The information in this brochure has not been approved or verified by the U.S. Securities and Exchange Commission or by any State securities authority.

Additional information about Quovo is available on the Internet at http://www.adviserinfo.sec.gov/IAPD/Content/IapdMain/iapd_SiteMap.aspx

You can search this site using Quovo, Inc. as the name of the investment adviser.

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MATERIAL CHANGES

Since the filing of our last Form ADV in March 2013, Quovo has had the following material changes:

- Change in corporate structure from LLC to C-Corporation (no effect on the business practices or operations).
- Sale of preferred stock to several investors (no effect on the business practices or operations).

OVERVIEW

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TYPES OF CLIENTS

Quovo's client base and prospective client base is diverse and always growing. Our clients or prospective clients may include any of the following entities:

- Individuals
- Trusts, estates, or charitable organizations
- Pensions and profit sharing plans
- Corporations or business entities other than those listed above

Our online advisory service is designed to be used by both individual investors and larger institutional investors. In general, we make the same services available to all clients who are individual investors, although we reserve the right to offer different services to different clients, for any reason.

In all cases, Quovo is dedicated to meeting the investment objectives of each client, and we will not take on any new client if such relationship precludes us from continuing to deliver a high level of service to our existing clients.

SERVICES AND FEES

As of the date of this brochure, Quovo does not provide investment management services to any clients. However, in the future, we may offer those services to clients on a discretionary basis. Instead Quovo offers

analysis and advisory services to clients based on their current investments, through the use of online software that aggregates investment information.

Quovo user clients may link their other investment accounts to our system, from which Quovo may gather information about that user client's investment choices. Quovo has created a proprietary set of algorithms that combines these past transactions and account information into consensus opinions, which are then used to inform the advice provided to other user clients.

Quovo's advice is guided by the individual investment opinions and strategies of Quovo's community of on-line internet-user clients. Clients of Quovo may be individuals, pension plans, or other types of investors.

Prospective clients may be asked to complete an on-line questionnaire that will provide guidance regarding the selection of an appropriate investment strategy.

Quovo may also offer investment advice for clients who do not wish to have an advisor directly manage their money, but who are seeking investment advice and guidance. This advice will be given to clients through Quovo's online systems, primarily based on the consensus-based algorithms described below.

As of December 31, 2013, 100% of Quovo's advisory business was focused on advisory advice and reports for clients. Going forward, this balance may shift towards more direct management, but in 2014 it is expected that the business will remain focused on advisory reports and advice.

The outputs of our system may result in advice for long term purchases, short term purchases, or "trades" (selling a security within 30 days of purchase). In most cases, our system promotes a long term "buy and hold" strategy of investing.

As a result of this process, a user client may receive the same advice as other user clients even if a user client does not support a particular investment decision.

To be a Quovo client, a person or institution must contractually agree to receive all documents and other reports provided by Quovo via electronic delivery of email.

There is no guarantee that the securities market or securities that Quovo suggests for inclusion in a user client's portfolio will increase in value. It is possible to lose money by implementing the advice suggested by Quovo. Quovo's proprietary algorithms have not been back-tested, and the generation of profitable securities recommendations cannot be guaranteed or promised.

The value of securities investments will go up and down in response to changes in the market value. Market value will change due to business developments concerning a particular issuer or industry, as well as general market and economic conditions. An undervalued stock may not increase in price as anticipated by Quovo if other investors fail to recognize the company's value or the factors that the Quovo believed would increase the price does not occur. A user client should be able to accept significant short-term fluctuations in value.

For clients who receive investment advice from Quovo, fees will depend on the type of reports generated for that client. These reports vary in cost depending on the information and advice contained within each report. Prospective subscribers can see details on all of Quovo's reports on its website, although they will first be required to create a free account and establish a profile prior to seeing the available advice options.

All fees paid to Quovo for advisory services are separate and distinct from the fees and expenses charged by mutual funds or other securities whose purchase is suggested by Quovo's advice system, including money market accounts, to their shareholders. In addition, user clients are responsible for all broker and custodian fees respective to their accounts.

A client advisory agreement may be canceled at any time, by either party, for any reason upon receipt of 5 days written notice. Upon termination of the advisory relationship, user clients may be entitled to a fee reimbursement for services not yet provided, however other fees may not be refunded.

TYPES OF INVESTMENTS

Quovo may provide investment advice on the following types of financial instruments:

- Exchange-listed securities (including but not limited to: common stock, preferred stock, exchange traded funds (ETFs), etc.)
- Securities traded "over-the-counter"
- Mutual fund shares
- Fixed income instruments

PROXY VOTING POLICY

Because Quovo does not provide direct management services for its clients, there is no proxy voting policy in place.

INVESTMENT METHODS AND STRATEGIES

As described above, Quovo utilizes client user information generated from outside brokerage accounts that are synced to Quovo's system.

EDUCATION AND BUSINESS STANDARDS

Quovo requires investment personnel to have appropriate education and business background. From time to time, Quovo employees may buy and sell the same securities that are recommended to our clients.

EDUCATION AND BUSINESS BACKGROUND

(Warren) Lowell Putnam
Born 10/31/1982

Mr. Putnam received a Bachelor of Arts Degree from Harvard College in June 2005 (majoring in American History and Literature). He began as an Associate in the Investment Banking Division of Lehman Brothers/Barclays Capital from July 2005 to October 2008. Since October 2008, he has been working on the development of Quovo, which he formally established as the Managing Member in June, 2009.

As a business entity, Quovo Inc. has other members and employees, however, as of the date of this brochure, none of such members or employees have access to client information or are responsible for making investment advisory decisions.

DISCIPLINARY INFORMATION

Neither Quovo nor any of its principal employees have been involved in any material disciplinary, criminal or civil actions.

CODE OF ETHICS

Quovo has adopted a Code of Ethics expressing the firm's commitment to ethical conduct. Quovo's Code of Ethics describes the firm's fiduciary duties and responsibilities to clients and sets forth Quovo's practice of supervising the personal securities transactions of employees with access to client information.

Individuals associated with Quovo may buy or sell securities for their personal accounts identical or different than those recommended to clients. It is the expressed policy of Quovo that no person employed by the firm shall prefer his or her own interest to that of an advisory client or make personal investment decisions based on investment decisions of advisory clients.

To supervise compliance with its Code of Ethics, Quovo requires that anyone associated with this advisory practice with access to advisory recommendations provide annual securities holding reports and quarterly transaction reports to the firm's Chief Compliance Officer or his or her designee. Quovo also requires such access persons to receive approval from the Chief Compliance Officer (CCO must receive pre-approval from a separate appropriate person) prior to investing in any IPO's or private placements.

MINIMUM ACCOUNT SIZE

Because Quovo does not provide direct management services for its clients, there is no minimum account size required to receive advice from our services. While the nature of our advice may change depending on a user's total net worth or the amount they have available to invest, these amounts do not affect the eligibility of a user client for receiving advice from Quovo.

ACCOUNT REVIEWS AND REPORTS

Because Quovo does not provide direct management services for its clients, there is no need for account review or reporting. As mentioned previously, one of Quovo's services is the ongoing monitoring and analysis of outside investment accounts synced to our system. We do not provide any guarantees for the accuracy or reliability of this analysis, as we cannot always verify the integrity of the data that we receive from third parties.

INVESTMENT DISCRETION

Because Quovo does not provide direct management services for its clients, there is no need for Quovo to receive discretionary authority to execute any investments on their behalf. Clients may choose whether or not to implement our investment advice in their outside accounts.

Quovo does not engage in any brokerage or other service referrals to our clients, and we do not receive compensation from any outside source for providing investment advice or referring any outside service to our clients.

BROKERAGE PRACTICES

Because Quovo does not provide direct management services for its clients, there are no brokerage practices in place. User clients can generally implement our advice in any outside portfolio.

APPENDIX A: FINANCIAL STATEMENTS

Because Quovo does not provide direct management services to clients, we are not required to include a balance sheet with this Form ADV.