

Part 2A of Form ADV: Firm Brochure

Item 1 Cover Page

VIRTUE OF SELFISH INVESTING, LLC

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This Brochure provides information about the qualifications and business practices of Virtue of Selfish Investing, LLC (the “**Adviser**” or “**we**”). If you have any questions about the contents of this Brochure, please contact us by telephone at 310-237-5832 or by email at info@mokainvestors.com. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission (the “**SEC**”) or by any state securities authority.

Additional information about Virtue of Selfish Investing, LLC also is available on the SEC’s website at www.adviserinfo.sec.gov.

Registration as an investment adviser with the SEC or with any state securities authority does not imply any level of skill or training.

Item 2 Material Changes

As required by SEC rules, through this summary, Virtue of Selfish Investing, LLC (the “Adviser”) is identifying and discussing the changes from its last annual update to its Form ADV Part 2A, dated March 2013, that it believes may be material.

The Adviser has terminated its managed account program. Accordingly, the Adviser no longer provides advisory services with respect to client accounts. Accordingly, Item 4 (Advisory Business) and Item 5 (Fees) have been updated to remove references to the managed account program. Additionally, the Adviser has updated Item 12 (Brokerage Practices), Item 13 (Review of Accounts), Item 14 (Client Referrals and Other Compensation), Item 16 (Investment Discretion), and Item 17 (Voting Client Securities) to reflect that these items are no longer applicable to the Adviser’s business.

The Adviser is a wholly-owned subsidiary of MoKa Investors, LLC (the “Affiliate”). The Adviser and the Affiliate share management persons and investment personnel. Prior to 2014 the Affiliate served as the investment adviser and general partner to a pooled investment vehicle. The pooled investment vehicle has been liquidated and the Affiliate no longer conducts any investment advisory business. Accordingly, Item 6 (Side by Side Management), Item 10 (Other Financial Industry Activities and Affiliations) and Item 11 (Code of Ethics, Participation or Interest in Client Transactions and Personal Trading) have been updated to reflect that the Affiliate has ceased to conduct its investment advisory business.

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Item 4 Advisory Business

A. General Description of Advisory Firm

Virtue of Selfish Investing, LLC (the “**Adviser**”) was formed on June 8, 2011 as a limited liability company under the laws of the State of Delaware. Our principal place of business is in Playa del Rey, California. The Adviser is a wholly-owned subsidiary of MoKa Investors, LLC (a Delaware limited liability company). MoKa Investors, LLC is wholly-owned by Gilbert J. Morales and Christian D. Kacher, each of whom currently is a principal executive officer and management person of Moka Investors, LLC and the Adviser.

B. Description of Advisory Services

1. Newsletters

The Adviser issues newsletters to paid subscribers. These newsletters include (a) investment advice tailored to subscribers’ various investment situations, and (b) buy and sell directions with respect to specific securities. Certain archived newsletters are available at www.VirtueofSelfishInvesting.com.

2. Webinars

The Adviser hosts interactive webinars for paid subscribers. The Adviser discusses current market conditions in these webinars, and specifically addresses investment concerns and/or answers investment questions that are posed by webinar participants.

C. Wrap Fees

Virtue of Selfish Investing, LLC currently does not participate in any wrap fee programs.

D. Client Assets Under Management

As of March 1, 2014, the Adviser had \$0 million in assets under management. As of that date, the Adviser managed \$0 on a discretionary basis and \$0 on a non-discretionary basis.

Item 5 Fees and Compensation

A. Advisory Fees and Compensation

Newsletters and Webinars

The Adviser issues newsletters to paid subscribers, and hosts interactive webinars for paid subscribers. Subscription fees are currently as follows:

	Monthly Fee	Quarterly Fee
Newsletters	\$59.95	\$149.95
Webinars	\$69.95	\$175.95
Newsletters and Webinars (discounted bundled price)	\$99.95	\$249.95

Subscription rates are subject to change at the discretion of Adviser. Subscription fees must be paid in advance either monthly or quarterly. A subscription may be terminated at any time. Subscribers who cancel a new subscription within the first two weeks will obtain a full refund of the initial subscription fee upon request.

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

This item is inapplicable.

Item 7 Types of Clients

The Adviser's clients consist of individuals and institutional investors. The Adviser operates an investment website, www.VirtueofSelfishInvesting.com, which is a subscription-based service offering specific, personalized investment advice through newsletters to its "members" (subscribers). The Adviser also hosts interactive webinars for paid subscribers. These webinars provide the Adviser with an opportunity to specifically address investment concerns and/or answer investment questions that are posed by webinar participants.

Item 8**Methods of Analysis, Investment Strategies and Risk of Loss****A. Methods of Analysis and Investment Strategies**

The Adviser utilizes a variety of methods and strategies to make investment decisions and recommendations. These methods entail an evaluation of investment opportunities using fundamental, technical, quantitative and qualitative analyses to determine the potential for securities and other types of instruments to appreciate in value of securities and other types of instruments, as well as the general market direction.

The Adviser employs the following investment strategies:

Market Direction Model: The Adviser employs a market direction for the purpose of identifying the general market direction and purchasing or selling short appropriate Exchange Traded Funds (ETF) or similar vehicles for the purpose of exploiting an identifiable trend.

O'Neil Style Methodologies: When investing in equities, the Adviser utilizes methods based on William J. O'Neil's investment philosophies and methods. Gil Morales and Dr. Chris Kacher both served as internal Portfolio Managers for William O'Neil + Company, Inc. (WON) during or within the period of 1997-2005, and their methods are both based and derived from O'Neil methodologies used during that period. In addition, Both Mr. Morales and Dr. Kacher have, in tandem and separately, developed their own unique ancillary strategies and sub-systems that extend and refine the O'Neil-based methodologies they employed while managing money for WON from 1997-2005. These ancillary strategies and sub-systems are discussed in the book they co-authored together, "Trade Like An O'Neil Disciple: How We Made 18,000% in the Stock Market," but are not limited in the sense that Mr. Morales and Dr. Kacher are constantly seeking to improve existing ancillary strategies and sub-systems as well as to develop new ancillary strategies and sub-systems which enhance, refine, and extend their existing methods. Therefore, over time, their strategies and methods will evolve and potentially vary from those used at any particular point in time.

Leverage. The Adviser's investment program may utilize leverage which involves the borrowing of funds from brokerage firms, banks and other institutions in order to be able to increase the amount of capital available for marketable securities investments.

Short Selling. The Adviser utilizes short selling strategies. In a short sale transaction, the Adviser sells a security it does not own in anticipation that the market price of that security will decline. The Adviser makes short sales (i) as a form of hedging to offset potential declines in long positions in similar securities, (ii) in order to maintain flexibility and, (iii) for profit. In general, but not always exclusively, the Adviser will seek to sell-short in a bear market environment. The general philosophy and methods utilized are discussed in the book that Mr. Morales co-authored with William J. O'Neil, "How to Make Money Selling Stocks Short," (Wiley 2004), as well as Chapter 6 of "Trade Like an O'Neil Disciple" referenced above. As with all of their strategies, Mr. Morales and Dr. Kacher are constantly refining and re-configuring in real-time and so such strategies are continually evolving.

These methods, strategies and investments involve risk of loss to clients and clients must be prepared to bear the loss of their entire investment.

B. Material Risks (Including Significant, or Unusual Risks) Relating to Investment Strategies

Issuer-Specific Changes. Changes in the financial condition of an issuer or counterparty, changes in specific economic or political conditions that affect a particular type of security or issuer, and changes in

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

Short Selling Risk. The Adviser's investment strategies include short selling, which at times may increase activity within the accounts or funds they manage. Short selling transactions expose an investor to the risk of loss in an amount greater than the initial investment, and such losses can increase rapidly and without effective limit. There is the risk that the securities borrowed by the Adviser in connection with a short sale would need to be returned to the securities lender on short notice. If such request for return of securities occurs at a time when other short sellers of the subject security are receiving similar requests, a "short squeeze" can occur, wherein the Adviser might be compelled, at the most disadvantageous time, to replace the borrowed securities previously sold short with purchases on the open market, possibly at prices significantly in excess of the proceeds received earlier.

Relative Value Risk. In the event that the perceived mispricings underlying the Adviser's relative value trading positions were to fail to converge toward, or were to diverge further from, relationships expected by the Adviser, clients may incur a loss.

Lack of Diversification. Clients will not be diversified among a wide range of types of securities, countries, regions, securities, industries, or sectors, and client accounts, at times, may expect hold a relatively small number of securities positions, each representing a relatively large portion of the account's capital. Losses incurred in those positions could have a material adverse effect on a client's overall financial condition. When investments are concentrated in several relatively large security positions or industries relative to the capital of a client account, a loss in any one position or a downturn in a sector in which such account is invested could materially reduce the investor's performance.

Leverage. Performance may be more volatile if a client employs leverage.

Frequent Trading. The Adviser's primary strategy uses frequent trading which results in significantly higher commissions and charges to clients due to increased brokerage, which will offset client profits.

C. Risks Associated with Types of Securities that are Primarily Recommended

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

Small Capitalization Companies. Micro-, small- and mid-cap companies in which the Adviser may invest are often more vulnerable than larger companies to adverse business or market developments, have limited markets and financial resources. These companies may lack experienced management, have a limited operating history, may be operating at a loss or with substantial variations in operating results from period to period and may require substantial additional capital to support expansion or to achieve or maintain a competitive position. These investments may include venture capital, special situations and, to a limited extent, private investments. Although these investments may offer opportunities for significant

gains, these investments generally involve a very high degree of business and financial risk and can result in substantial losses. The securities of small-cap companies tend to be less seasoned than, and more susceptible to volatility in valuation and performance, than larger and more seasoned companies. In addition, small- and medium-sized companies often are not as well known to the investing public, in part, because relatively few of them are followed by traditional Wall Street security analysts, and information about them may be more difficult to obtain and may be less reliable and more subjective than information about larger public companies.

Fixed-Income and Debt Securities. Investment in fixed-income and debt securities such as bonds, notes and asset-backed securities, subject a client's portfolios to the risk that the value of these securities overall will decline because of rising interest rates. Similarly, portfolios that hold such securities are subject to the risk that the portfolio's income will decline because of falling interest rates. Investments in these types of securities will also be subject to the credit risk created when a debt issuer fails to pay interest and principal in a timely manner, or that negative perceptions of the issuer's ability to make such payments will cause the price of that debt to decline. Lastly, investments in debt securities will also subject the investments to the risk that the securities may fluctuate more in price, and are less liquid than higher-rated securities because issuers of such lower-rated debt securities are not as strong financially, and are more likely to encounter financial difficulties and be more vulnerable to adverse changes in the economy.

Exchange Traded Funds. Because ETFs are, by definition, portfolios of securities, the Adviser believes that the unsystematic risk associated with investments in ETFs is generally very low relative to investments in ordinary securities of individual issuers. However, there are events that can trigger sharp and sometimes adverse price movements in ETFs that are not related to movements of the market in general. Not limited to, but among these, are surprise dividends, changes to regular dividend amounts, announcements of rights offerings and possible surprise revisions to net asset values of the ETF. The Adviser may invest in small and/or unseasoned ETFs with small market capitalization. While smaller ETFs generally have potential for rapid growth, they often involve higher risks because they may lack the management experience, financial resources, product diversification, and competitive strength of larger ETFs. In addition, in many instances, the frequency and volume of their trading may be substantially less than is typical of larger ETFs. As a result, the securities of smaller ETFs may be subject to wider price fluctuations.

Security Futures and Options. In connection with the use of futures contracts and options, there may be an imperfect correlation between the change in market value of a security and the prices of the futures contracts and options in the client's account. In addition, the Adviser's investments in security futures and options may encounter a lack of a liquid secondary market for a futures contract and the resulting inability to close a futures position prior to its maturity date.

Item 9 Disciplinary Information

This Item is inapplicable.

Item 10 Other Financial Industry Activities and Affiliations

This item is inapplicable.

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

A. Code of Ethics

The Adviser has adopted a Code of Ethics (the “**Code**”) that obligates the Adviser and its related persons to put the interests of the Adviser’s clients before their own interests and to act honestly and fairly in all respects in their dealings with clients. All of the Adviser’s personnel are also required to comply with applicable federal securities laws. Clients or prospective clients may obtain a copy of the Code by contacting Gil Morales (Chief Compliance Officer) by telephone at 310-237-5832 or by email at info@mokainvestors.com. See below for further provisions of the Code as they relate to the pre-clearing and reporting of securities transactions by related persons.

The Adviser and/or its employees, in the course of its investment management and other activities (*e.g.*, board or creditor committee service), may come into possession of confidential or material nonpublic information about issuers, including issuers in which the Adviser or its related persons have invested or seek to recommend to clients. The Adviser is prohibited from improperly disclosing or using such information for its own benefit or for the benefit of any other person, regardless of whether such other person is a client. The Adviser maintains and enforces written policies and procedures that prohibit the communication of such information to persons who do not have a legitimate need to know such information and to assure that the Adviser is meeting its obligations to clients and remains in compliance with applicable law. In certain circumstances, the Adviser may possess certain confidential or material, nonpublic information that, if disclosed, might be material to a decision to buy, sell or hold a security, but the Adviser will be prohibited from communicating such information to the client or using such information for the client’s benefit. In such circumstances, the Adviser will have no responsibility or liability to the client for not disclosing such information to the client (or the fact that the Adviser possesses such information), or not using such information for the client’s benefit, as a result of following the Adviser’s policies and procedures designed to provide reasonable assurances that it is complying with applicable law.

B. Investing in Securities Recommended to Clients

The Adviser recognizes that the personal investment transactions of members and employees of the Adviser demand the application of a high code of ethics and will require that all such transactions be carried out in a way that does not endanger the interest of any client. At the same time, the Adviser believes that if investment goals are similar for clients and for members and employees of the Adviser, it is logical that there be a common ownership and/or recommendations of some securities. Therefore, in order to address conflicts of interest, the Adviser has adopted a set of procedures with respect to transactions effected by its officers and employees (hereafter, “**Employees**”) for their “personal accounts.” In order to monitor compliance with its personal trading policy, the Adviser has adopted a quarterly securities transaction reporting system for all of its Employees. (For purposes of the policy, an Employee’s “personal account” generally includes any account (a) in the name of the Employee, his/her spouse, his/her minor children or other dependents residing in the same household, (b) for which the Employee is a trustee or executor, or (c) which the Employee controls.

From time to time, trading by the Adviser and its Employees (and certain of their relatives) in particular securities may be restricted in recognition of impending investment recommendations to clients.

The Adviser and its Employees may purchase or sell specific securities for their own account based on personal investment considerations without regard to whether the recommendation to purchase or sell the securities is appropriate for clients. An Employee must adhere to certain procedures when buying or

selling a security for a personal account. These procedures will include, among other things: (i) the Employee must confirm that he or she is not in receipt of inside information; (ii) the Employee must seek approval from the Chief Compliance Officer for all trades of securities made for a personal account; and (iii) the Employee must execute all approved trades on the day the approval for such trade is given. If the trade is not executed on such day, the Employee must seek new approval.

C. Conflicts of Interest Created by Contemporaneous Trading

See Item 11.C.

Item 12 Brokerage Practices

This item is inapplicable.

Item 13**Review of Accounts**

The Adviser issues newsletters to and hosts interactive webinars for paid subscribers. The Adviser does not provide periodic reviews of such subscribers' financial plans or portfolios in connection with these activities. The Adviser may, however, respond to client inquiries regarding their portfolios or financial plans through the interactive webinar or the question and answer portion of the newsletter.

Item 14 Client Referrals and Other Compensation

This item is inapplicable.

Item 15 Custody

The Adviser does not have “custody” of client assets for purposes of Rule 206(4)-2 under the Investment Advisers Act of 1940, as amended.

Item 16 Investment Discretion

The Adviser provides investment advisory services to paid subscribers through its newsletter and interactive webinars. The Adviser does not currently manage securities accounts on behalf of clients.

Item 17 Voting Client Securities

The Adviser does not currently manage securities accounts on behalf of clients and therefore does not have proxy voting authority.

Item 18 Financial Information

We have no financial commitment that impairs our ability to meet contractual commitments to clients, and have not been the subject of bankruptcy proceedings.

Item 19 Requirements for State-Registered Advisers

This Item is not applicable.