

FIRM BROCHURE

(Part 2A of Form ADV)

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This brochure provides you with information about the qualifications and business practices of The Vishni Advisory, LLC. If you have any questions regarding the contents of this brochure, please contact us at +44 781.783.6855.

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority.

We are registered as an investment adviser with the SEC. However, registration as an investment adviser does not imply a certain level of skill or training. Additional information about The Vishni Advisory, LLC is available on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number known as a CRD number. Our firm's CRD number is 307214.

May 18, 2020

Item 2 Material Changes

Annual Update

This section of our brochure will reflect the annual update of any material changes that occurred since the previous delivery of our firm's brochure.

Full Brochure Available

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at +44 781.783.6855 or by email at devbhojwani1@yahoo.co.uk.

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Item 4 Advisory Business

A. Firm Description

The Vishni Advisory, LLC, (“Vishni Advisory” or the “Firm”) is organized as a Delaware limited liability company. It was founded on November 21, 2019.

The principal owner of Vishni Advisory Dev Bhojwani.

B. Types of Advisory Services

Vishni Advisory provides newsletter subscription services for a fee to clients. These services include a newsletter and security ratings service that will offer recommendations on purchasing and selling specific securities, sectors, asset classes, or other specific groupings of securities at a stated time. This newsletter will be provided via electronic mail and via a website and can be cancelled by giving 30 days prior written notice. Transaction recommendations are sent to our clients for them to communicate to their qualified custodians who execute, compare, allocate, clear, and settle the transactions. We neither handle nor execute trades for clients.

C. Tailored Relationships

The Firm tailors its advisory services to the individual needs of clients. The Firm consults with clients initially and on an ongoing basis as requested to determine risk tolerance, time horizon and other factors that may impact the clients’ investment needs. The Firm ensures that each client’s services involve options that are suitable for their investment needs, goals, objectives and risk tolerance.

D. Wrap Fee Programs

Vishni Advisory is not a participant in, or a sponsor of, any wrap fee program.

E. Assets Under Management

Vishni Advisory does not manage any client assets on a discretionary or non-discretionary basis as of May 18, 2020.

Item 5 Fees and Compensation

A. Advisory Fees

Vishni Advisory offers a monthly subscription newsletter and quarterly allocation updates to clients. Clients choose between varying subscription levels that include services ranging from newsletters and allocation updates to personalized

onboarding. The subscription dues are generally charged monthly in advance; however, clients have the option to pay annually in advance at a discounted rate.

B. Billing

Subscription fees are generally charged monthly or annually and paid via wire.

C. Other Fees & Expenses

Clients may incur certain charges imposed by other third parties which are not assessed or received by Vishni Advisory.

D. Refund Policy

A client agreement may be canceled at any time, by Vishni Advisory or the client, for any reason, upon receipt of a written notice. Upon termination, Vishni Advisory will refund the prorated portion of the subscription fee paid based upon the number of days remaining in the billing cycle (minus a 5% administration fee).

E. Other Compensation

Vishni Advisory does not receive any compensation other than its advisory fees, as described in Item 5A.

Item 6 Performance-Based Fees

Vishni Advisory does not accept performance-based fees or other fees based on a share of capital gains on, or capital appreciation of, the assets of a client.

Item 7 Types of Clients

Vishni Advisory provides investment subscription services to qualifying individuals and entities.

Item 8 Methods of Analysis and Risk of Loss

A. Methods of Analysis

Vishni Advisory employs charting, technical, and quantitative analyses of securities to achieve the investment objectives of each client. Investing in securities involves risk of loss that clients should be prepared to bear.

B. Material Risks of Methods of Analysis and Investment Strategies

Charting analysis strategy involves using and comparing various charts to predict long and short term performance or market trends. The risk involved in using this method is that only past performance data is considered without using other

methods to crosscheck data. Using charting analysis without other methods of analysis would be making the assumption that past performance will be indicative of future performance. Past performance is not indicative of future performance.

Technical analysis attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns, thus relying solely on this method does not always work.

Investment strategies using quantitative models perform differently than expected as a result of, among other things, the factors used in the models, the weight placed on each factor, changes from the factors' historical trends, and technical issues in the construction and implementation of the models.

C. Recommendation of Specific Types of Securities

Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below are not guaranteed or insured by the FDIC or any other government agency.

Mutual Funds: Investing in mutual funds carries the risk of capital loss and thus you can lose money investing in mutual funds. All mutual funds have costs that lower investment returns. They can be of bond “fixed income” nature (lower risk) or stock “equity” nature (mentioned below).

Equity: Investment in equities generally refers to buying shares of stocks in return for receiving a future payment of dividends and capital gains if the value of the stock increases. The value of equity securities fluctuates in response to specific situations for each company, industry market conditions and general economic environments.

Exchange Traded Funds (ETFs): Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). The price of Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed “electronic shares” not physical metal) are negatively impacted by several factors, among them (1) large sales by the official sector which own a significant portion of aggregate world holdings in gold and other precious metals, (2) a significant increase in hedging activities by producers of gold or other precious metals, (3) a significant change in the attitude of speculators and investors. This is not meant to

be an exhaustive list of all possible risks associated with ETF's. Please ask your adviser for more information if you have further questions.

Bonds (Interest Rate Risk): Investing in bonds carries the risk that bond prices will fall as interest rates rise. By buying a bond, the bondholder has committed to receiving a fixed rate of return for a fixed period.

Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Item 9 Disciplinary Information

Vishni Advisory and its employees have not been involved in any legal or disciplinary events related to past or present investment clients.

Item 10 Other Financial Industry Activities and Affiliations

A. Financial Industry Activities

Vishni Advisory is not a registered broker-dealer and does not have an application pending to register as a broker-dealer. Furthermore, none of Vishni Advisory's management or supervised persons is registered as representatives of, or has an application pending to register as representatives of, a broker-dealer.

B. Financial Industry Affiliations

Vishni Advisory is not a registered futures commission merchant, commodity pool operator, or commodity trading advisor, and does not have an application pending to register as such. Furthermore, none of Vishni Advisory's management or supervised persons is registered as, or has applications pending to register as, an associated person of any such entity.

C. Other Material Relationships

Vishni Advisory does not have any arrangements that are material to its advisory business or its clients with a related person who is a broker-dealer, investment company, other investment advisor, financial planning firm, commodity pool operator, commodity trading adviser, futures commission merchant, banking or thrift institution, accounting firm, law firm, insurance company or agency, pension consultant, real estate broker or dealer, or an entity that creates or packages limited partnerships other than those already disclosed herein.

D. Other Investment Advisers

Vishni Advisory does not have any arrangements that are material to its advisory business or its clients with other investment advisers.

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

A. Code of Ethics

All employees of Vishni Advisory must act in an ethical and professional manner. In view of the foregoing and applicable provisions of relevant law, Vishni Advisory has determined to adopt a Code of Ethics to specify and prohibit certain types of transactions deemed to create conflicts of interest (or at least the potential for or the appearance of such a conflict), and to establish reporting requirements and enforcement procedures relating to personal trading by Vishni Advisory personnel. Vishni Advisory's Code of Ethics, which specifically deals with professional standards, insider trading, personal trading, gifts and entertainment, and fiduciary duties, establishes ideals for ethical conduct based upon fundamental principles of openness, integrity, honesty, and trust. We will provide a copy of our Code of Ethics to any client or prospective client upon request.

B. Participation of Interest in Client Transactions

Vishni Advisory does not recommend that clients buy or sell any security in which a related person to Vishni Advisory or Vishni Advisory has a material financial interest.

C. Proprietary Trading

At times, we at Vishni Advisory may buy or sell securities for our own accounts that we have also recommended to clients. Vishni Advisory will always document any transactions that could be construed as conflicts of interest. To mitigate or remedy any conflicts of interest or perceived conflicts of interest, we will monitor our proprietary and personal trading reports for adherence to our Code of Ethics.

D. Simultaneous Trading

When the Firm is recommending securities transactions for a client, no representative of the Firm may effect for themselves or for their immediate family (i.e., spouse, minor children, and adults living in the same household as the representative) a transaction in that security on the same day the recommendation is delivered.

These requirements are not applicable to: (i) direct obligations of the Government of the United States; (ii) money market instruments, bankers' acceptances, bank certificates of deposit, commercial paper, repurchase agreements and other high

quality short-term debt instruments, including repurchase agreements; (iii) shares issued by mutual funds or money market funds; and (iv) shares issued by unit investment trusts that are invested exclusively in one or more mutual funds.

The Code of Ethics has been established recognizing that some securities trade in sufficiently broad markets to permit transactions by representatives of the Firm to be completed without any appreciable impact on the markets of such securities. Therefore, under certain limited circumstances, exceptions may be made to the policies stated above.

Item 12 Brokerage Practices

A. Selection and Recommendation

The Firm does not recommend or require clients to utilize a particular broker dealer in order to follow any recommendations. If a client requests information, the Firm will provide information about broker dealers for a client to consider. The decision of what broker dealer a client chooses is the responsibility and final decision of the client.

B. Directed Brokerage

Vishni Advisory does not engage in the practice of directing brokerage trades to outside broker dealers for client referrals.

C. Order Aggregation

Vishni Advisory does not place any client transactions; therefore, order aggregation practices are not applicable.

Item 13 Review of Accounts

A. Periodic Reviews

Vishni Advisory does not manage portfolios or accounts and, therefore, does not conduct periodic reviews on a regular basis.

B. Intermittent Review Factors

Intermittent reviews may be triggered by substantial market fluctuation, economic or political events, or by changes in your financial status.

Clients are advised to notify Vishni Advisory promptly if there are any materials changes to their financial situations or investment objectives.

Item 14 Client Referrals and Other Compensation

A. Economic Benefits from Others

Vishni Advisory does not receive an economic benefit (such as sales awards or other prizes) from any third party for providing investment advice or other advisory services to its clients.

B. Compensation to Unaffiliated Third Parties

Vishni Advisory may, at times, enter into soliciting arrangements to provide cash compensation to third parties for client referrals or introductions. Our compensation agreements are made in accordance with Rule 206(4)-3 under the Investment Advisers Act of 1940 and applicable state regulations. Generally, these arrangements provide compensation equal to a specific percentage of the fees received by our firm. This arrangement may create a conflict of interest in that cash compensation may impair the solicitor's evaluation of the client's suitability for Vishni Advisory's investment programs. To mitigate or remedy this conflict of interest, the Chief Compliance Officer will review referrals to ensure suitability with the applicable investment program before compensating the solicitor.

Item 15 Custody

The Firm does not take custody of any funds and securities. As a result, the Firm does not accept securities or forward securities to your brokerage firm or custodian. The only checks accepted as payable to the Firm are those submitted for payment of advisory fees.

Item 16 Investment Discretion

Vishni Advisory does not accept any discretionary authority to manage securities accounts on behalf of clients.

Item 17 Voting Client Securities

The Firm is required to disclose if it accepts authority to vote client securities. The Firm does not vote client securities on behalf of its clients. Clients receive proxies directly from the financial institutions that hold their accounts.

Item 18 Financial Information

A. Balance Sheet Requirement

Vishni Advisory does not require or solicit prepayment of more than \$500 in advisory fees per client, six months or more in advance.

B. Financial Condition

Vishni Advisory does not have any financial impairment that will preclude it from meeting contractual commitments to clients.

C. Bankruptcy Petition

Vishni Advisory has not been the subject of a bankruptcy petition at any time during the past ten (10) years.

PRIVACY POLICY

Vishni Advisory does not disclose nonpublic personal information about its clients or former clients to any persons other than as described below. Vishni Advisory collects information about its clients (such as name, address, social security number, assets and income) from discussions with clients, from documents that clients may deliver to Vishni Advisory, and in the course of providing services. In order to service its clients, Vishni Advisory may provide client personal information to its affiliates and to firms that assist it in servicing clients and which have a need for such information. Vishni Advisory does not otherwise provide information about its clients to outside firms, organizations or individuals, except as required by law. Any party that receives this information will use it only for the services required and as allowed by applicable law or regulations, and is not permitted to share or use this information for any other purpose.