



## Item 1. Cover Page

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### **DNDRO INC.**

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### **Form ADV Part 2A Brochure**

**February 16, 2021**

This brochure provides information about the qualifications and business practices of DNDRO INC. (hereinafter "dndro" or "firm"), and its registered investment adviser representatives. Registration as a registered investment advisor does not imply a certain level of skill or training but only indicates that DNDRO INC. has registered its business with state and federal regulatory authorities, including the United States Securities and Exchange Commission ("SEC"). If you have any questions about the contents of this brochure, please contact us at [contact@dndro.com](mailto:contact@dndro.com) or +1 (206) 707-8960. The information in this brochure has not been approved or verified by SEC or by any state securities authority.

As used in this brochure, the words "we," "our," and "us" refer to DNDRO INC., and the words "you," "your," and "client" refer to you as either a client or prospective client of our firm.

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

## Item 2. Material Changes

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There is no material change to DNDRO INC.'s Form ADV for the time being of February 16, 2021, since this is DNDRO INC.'s first brochure. DNDRO INC. reviews and updates at least annually to remain the current version of the brochure.

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## Item 4. Advisory Business

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DNDRO INC. is an Internet Adviser (Robo-Advisor) and is formed as a C corporation under the laws of the State of Washington.

Mr. Zhenhan Huang is the President, Chief Executive Officer, Chief Investment Officer, and Chief Compliance Officer of the firm.

### Financial Planning Services

Our principal service is providing subscription fee-based investment advisory services and financial planning services personalized for each client.

As an internet advisor, we utilize algorithmic-based programs, which clients interact with directly, to provide financial planning advice per clients' financial situation and objectives through our website or mobile application.

The potential clients are required to answer key questions regarding their risk-tolerance levels, financial information, and objectives, as well as their personal information, including but not limited to age, education level, and annual income.

Our algorithms formulate personalized investment portfolio construction advice or recommend specific stocks based on client's financial situation and objectives. Due to the volatility of the financial markets, our algorithms may recommend asset allocations or suggest operations on specific stocks to reduce the overall risk and increase performance of the portfolios formulated. We disclose the potential risks of the financial advices generated by our algorithms to the clients.

Investment Advisor Representatives of DNDRO INC. provide general non-securities advice to clients who pay the subscription fee at no extra cost.

DNDRO INC. does not practice discretionary management of clients' financial accounts and at no time will accept or maintain custody of clients' funds or securities, nor provide other administrative services.

### Types of Investments

Although we do not recommend one particular type of security over other types of securities, we do provide advice majorly on two types of securities: Exchange Traded Fund ("ETF") and Publicly-traded Equity Securities. You may impose restrictions on investments in particular securities or certain types of securities. You must provide these restrictions to our firm in writing.

## Item 5. Fees and Compensation

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In order to use services from DNDRO INC., clients are required to subscribe through our website or mobile application and pay a subscription fee. Subscription fee-based clients are billed on a monthly basis. Due to the value-added services clients may select, the range of subscription fee varies. Our non-negotiable subscription fee will typically be billed at a rate of \$5.00 to \$30.00 per month, regardless of clients' financial situations.

Fees are payable by debit or credit card through a designated third party payment processor.

Prior to engaging DNDRO INC. to provide financial planning and consulting services, the client will be required to enter into a written agreement with us. The agreement will set forth the terms and conditions of the engagement and describe the scope of the services to be provided and the fee payable by the client to DNDRO INC.

Either client or DNDRO INC. can terminate the agreement at any time by written notice to the other following the terms of the agreement. Any prepaid, unearned fees will be promptly refunded to the client. Any remaining balance due to DNDRO INC. will be payable as invoiced.

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

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DNDRO INC. does not accept performance based fees.

## Item 7. Types of Clients

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DNDRO INC. offers financial planning and advisory services to individuals and high net worth individuals.

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

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As an internet advisor, DNDRO INC. uses algorithmic-based models when providing clients with investment advice. Our algorithmic-based models utilize machine learning algorithms and data analysis techniques to generate financial planning and advisory advice, e.g., portfolio selection.

Our models require heterogeneous data sources, including structured (e.g., historical stock prices) and unstructured data (e.g., financial news, financial statement, or clients' financial situation).

The investment advice provided by DNDRO INC. will vary depending on your specific financial situation and goals.

Investing involves substantial risks, including complete possible loss of principal plus other losses, and may not be suitable for everyone. Unlike savings and checking accounts at a bank, investments are not insured by the government to protect against market losses. Different market instruments carry different types and degrees of risk, and you should familiarize yourself with the risks involved in the particular market instruments in which you intend to invest. Due to computer crashes or bugs in the programming codes, algorithmic-based models may generate invalid or unreasonable recommendations that lead to capital loss.

We will not disclose all types of risks in financial markets in the brochure, and you should fully understand the nature of the contractual relationship(s) into which you are entering and the extent of your risk exposure.

You should also carefully consider whether the investment DNDRO INC. provided would be appropriate for you in light of your experience, objectives, financial resources, and other relevant circumstances.

## **Item 9. Disciplinary Information**

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Neither DNDRO INC. nor Mr. Zhenhan Huang has a history of material legal or disciplinary events that are required to be reported in this section.

## **Item 10. Other Financial Industry Activities or Affiliations**

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Neither DNDRO INC. nor Mr. Zhenhan Huang is registered as, or has pending applications to register as, a broker/dealer, Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor.

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

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DNDRO INC. has adopted a Code of Ethics (the "Code") for all supervised persons of the firm to address investment advisory conduct. The Code focuses primarily on personal securities transactions, insider trading, gifts, and conflicts of interest.

A copy of DNDRO INC.'s Code of Ethics is available upon request to us [contact@dndro.com](mailto:contact@dndro.com).

Neither DNDRO INC. nor its associated persons does or intends to trade as a counterparty with clients.

DNDRO INC. does not hold accounts funded with the firm's own money to create profits.

DNDRO INC. or its associated persons may take the same positions in the same securities recommended to clients, which is considered a potential conflict of interest with clients.

## **Item 12. Brokerage Practices**

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DNDRO INC. does not practice discretionary management of clients' portfolios. DNDRO INC. does not use or recommend any particularly broker-dealers. Clients hold their discretionary authority to choose broker-dealers.

## **Item 13. Review of Accounts**

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DNDRO INC. does not manage clients' financial accounts but instead recommends investment portfolio selections and provides performance simulations. DNDRO INC. does not use or recommend any particularly broker-dealers. With that being said, DNDRO INC. monitors the investment portfolios recommended to clients continuously and recommends a formal review with the client at least annually. Clients will receive statements directly through email quarterly.

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

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DNDRO INC. does not compensate, directly or indirectly, any person or entity for client referrals.

## **Item 15. Custody**

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DNDRO INC. does not practice discretionary management of clients' financial accounts and at no time will accept or maintain custody of clients' funds or securities, nor provide other administrative services.

## **Item 16. Investment Discretion**

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DNDRO INC. does not practice discretionary management of clients' financial accounts and does not request discretionary authority from clients.

## **Item 17. Voting client Securities**

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DNDRO INC. does not practice discretionary management of clients' financial accounts, will not vote, or advise clients on how to vote, proxies for securities held in clients' own financial accounts.

## **Item 18. Financial Information**

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DNDRO INC. does not require or solicit prepayment of more than \$180 in subscription fees per client, six months or more in advance.

DNDRO INC. has no financial condition or commitment that impairs the firm's ability to meet its contractual and fiduciary commitments to clients.

Neither our DNDRO INC. nor Mr. Zhenhan Huang has been the subject of a bankruptcy petition.

## **Item 19. Requirements of State-Registered Advisers**

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DNDRO INC. is not subject to this item since the firm is registered with the United States Securities and Exchange Commission ("SEC").