



Streetlight On-Demand, LLC

Form ADV Part 2A – Disclosure Brochure

July 8, 2021

Streetlight On-Demand, LLC is a registered “investment adviser” with the United States Securities Exchange Commission (“SEC”). Registration with the SEC or any state securities authority does not imply a certain level of skill or training. This Form ADV 2A (“Disclosure Brochure”) provides information about the business practices and services of Streetlight On-Demand, (Streetlight On-Demand, LLC or the “Advisor”). If you have any questions about the contents of this Disclosure Brochure, please contact us via our streetlightondemand.com.

The information in this brochure has not been approved or verified by the SEC or by any state securities authority. Additional information about Streetlight On-Demand, LLC is available on the SEC’s website at www.adviserinfo.sec.gov. with our CRD Number: 312973

Streetlight On-Demand, LLC
streetlightondemand.com

Item 2 – Material Changes

Material Changes

This is the Initial Filing of the Disclosure Brochure (Form ADV Part 2A).

Future Changes

Streetlight On-Demand will provide numerous methods of disclosure and transparency about our business and the securities industry. The online platform encourages clients to read the Disclosure Brochure and will be additionally seek to communicate by other means to disclose all important business practices, changes and updates to this Disclosure Brochure or its business.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov or by searching with our firm name or our CRD# 312973.

Item 3 – Table of Contents

Item 1 – Cover Page	1
Item 2 – Material Changes	2
Item 3 Table of Contents	3
Item 4 Services Provided	
A. General Information	4
B. User Experience/Website	4
C. Account Management	4
Item 5 - Fees and Compensation	
A. Subscription-Based Clients	4
B. Corporate Clients	5
C. Portfolio Fees	5
Item 6 – Portfolio Selection Investment Strategies and Risk of Loss	5
Item 7 – Other Financial Industry Activities and Affiliations	5
Item 8 – Compensation for Sale of Insurance Products	5
Item 9 - Disciplinary Information	6
Item 10 - Code of Ethics, Participation or Interest in client Transactions and Personal Trading	6
Item 11 - Review of Accounts	6
Item 12 – Technology and Third-Party Vendors	6
Item 13 – Custody	7
Item 14 - Investment Discretion	7
Item 15 - Financial Information	7
Item 16 – Privacy Policy	7
State Specific Regulations	8

Item 4 – Services Provided

A. General Information

Streetlight On-Demand, LLC (the “Advisor”) is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”) conducting business as an “Internet-only” advisor pursuant to Section 203A-2 and all amendments of the Investment Advisers Act of 1940, as amended (the “Advisers Act”). The service serves clients exclusively through its interactive website. Streetlight On-Demand, LLC is primarily owned by Aaron Smith (President and Chief Compliance Officers). Additional owners are employees of the firm.

Streetlight Financial, LLC is separate service provider with distinctly differentiated clients, agreements and disclosures. Our beliefs and ethics as a company are same with both entities. Streetlight Financial, LLC provides its services to clients in-person.

B. User Experience/Website

All services delivered by Streetlight On-Demand are communicated in digital format using our intuitive website. Clients receive unique sign-on credentials. Our clients sign in, arrange for fee/payment and navigate user experience to build their own financial plan. The site has progress dashboard, intuitive and proprietary calculators, account opening, billing and various video and visual aids to guide the experience. Our website combines utilities with financial calculators and education to develop and maintain financial plan for unique client situation. Clients are prompted to answer questions and are guided the entire way to establish/maintain financial products and services uniquely and specific to clients situation.

C. Client Account Management

Once clients complete associated calculators and open accounts, our dashboard will provide access to accounts and account management. Clients are encouraged through ongoing communication and prompted to update information on a regular basis. Client accounts are established and maintained by customer and Streetlight On-Demand, LLC provides investment management services specific to goal established with portfolio. Advisor will maintain “advisor-discretion” to ongoing and active management of clients accounts.

Item 5 – Fees and Compensation

A. Subscription-Based Clients

Streetlight On-Demand is a subscription-based fee model. “Clients” of the Advisor are considered all immediate family members of one household. The fee is clients choice of \$300/year or \$36/month, ongoing in advance. Streetlight On-Demand, LLC provides ongoing management of client portfolios but does not charge an advisory fee from assets (of “AUM”). Additional commissions from insurance purchased through website are a separate arrangement and are disclosed.

B. Corporate Clients

Companies and organizations who pay fees for its employees or members of the organization are provided “Corporate Codes” and not charged additional subscription service fees.

C. Portfolio Fees

Portfolios provided by Streetlight On-Demand may involve securities that have various custodial charges/brokerage fees/expense ratios. Streetlight On-Demand does not participate in any revenue sharing with investment vendors. The program does not charge performance-based or any other fees. All fees are disclosed using written documentation and videos which describe disclosures as well.

Item 6 – Portfolio Selection, Investment Strategies and Risk of Loss

Streetlight On-Demand system will prompt clients to identify goal of portfolio, calculate current funding ratio (status) of goal. Process of selecting portfolio uses proprietary calculator and suggest portfolio to most appropriate satisfying calculated goal and current funding status. All clients are reminded using written, audio and video communication that past performance does not guarantee future returns. Investing in securities and other investments involve a risk of loss that each client should understand and be willing to bear. Investors are provided risk disclosures prior to opening each investment account on the system.

Streetlight On-Demand recognizes that disclosure of required documents is required and often overlooked and/or not understood by the client. Our system provides additional methods of communication such as video content, audio, and visual aids to properly disclose risks associated with securities and investments.

Item 7 – Other Financial Industry Activities and Affiliations

Streetlight On-Demand is Registered Investment Advisor and conducts business through interactive website for subscription-based compensation. Members of Streetlight On-Demand are also affiliated with Cambridge Investment Research as broker-dealer and an Investment Account Representative of Cambridge Registered Investment Advisory firm. Clients of “Streetlight Financial” are kept separate from “Streetlight On-Demand LLC” with distinctly separate agreements and are not affiliated.

Item 8 – Compensation for Sale of Insurance Products

Streetlight On-Demand acknowledges that each clients’ family and financial situation is different. The interactive website allows client to prioritize and implement various investment and insurance products given input and financial circumstances. The system will recognize and recommend insurance products only when appropriate and not to every client. The purpose of the Streetlight On-Demand is not to sell insurance or investment products. However, to allow clients access to educational tools, videos and calculators and provide the ability to implement products specific to each clients personal needs.

Streetlight On-Demand is not an insurance company or general agency. Members of Streetlight On-Demand are licensed to receive commission compensation for sale of insurance products

when calculated and implemented through the system. Insurance is only recommended when calculations deem appropriate.

Item 9 – Disciplinary Information

None

Item 10 – Code of Ethics

Streetlight On-Demand was created to provide accessible financial advice to every person regardless of age, race, ethnicity, or current financial situation. Conducting business in a fiduciary capacity shall be held as a minimum standard to our organization. Our policies and procedures have been developed to additionally address the following topics:

- Engage client to create custom profile for each client to provide truly customized client experience
- Empower clients to maintain and optimize current existing accounts and implement new accounts through system only when appropriate and necessary.
- To provide access to financial education and resources to everyone regardless of gender, race, ethnicity, gender, orientation, or beliefs.
- Promote diversity and inclusion within the financial services marketplace.
- We do not tier our fees based on income, account size or any other metric. Every client will have standardized pricing based on individual or corporate clients (see Item 5).
- It is the belief of our company that every individual should have the opportunity to achieve financial success with affordable and unbiased financial advice.

Supporting documents about our Code of Ethics can be found (streetlightondemand.com)

Item 11 – Review of Accounts

Clients of Streetlight On-Demand engage and get their services delivered via interactive website. Clients are asked to certify every twelve months to confirm their profile and financial circumstances have not changed. Clients are encouraged to review goals at least once per year to make sure portfolios and insurance plans are still appropriate for their personal situation. Clients are provided with interactive client website to keep track of accounts opened through the Streetlight On-Demand system along with accounts linked to website “held away” not associated with our firm.

Item 12 – Technology and Third-Party Vendors

Streetlight On-Demand has committed to providing services that were traditionally performed in-person setting by using the innovative technology and pre-recorded communication. Our interactive website is built to provide financial advice and is property of Streetlight On-Demand LLC. The custom-built website additionally uses third party industry websites when appropriate for certain services. Our commitment to client security and protection of client information is paramount to us. Our site adheres to each third-party vendor and their security standards. We

have implemented safety standards of our own. We will update our security and protection of our site at every chance improve security measures.

Item 13 – Custody

Streetlight On-Demand service will not recommend opening client accounts on our system for every goal and objective. The system may recommend keeping established accounts with current custodians due to fees, taxes, employer contributions and various other reasons. The system will allow clients to open up accounts attributed to their household when appropriate. These accounts will be opened using the APEX Clearing Corporation technology, agreements and account establishment documents. Any and all custodian fees, program fees and investment costs are taken from clients debited from client accounts. Streetlight On-Demand does not charge an “asset-based” fee on any client portfolios.

Details of security and compliance practices of APEX Clearing Corporation are available upon request and disclosed every time an account is opened online.

Item 14 – Investment Discretion

Streetlight On-Demand offers management of goals-based accounts on a discretionary basis. The system will give financial advice to achieve certain goals specific to each client. If client opens investment accounts using our managed account strategies the client must grant discretionary authority to our managed accounts.

Discretion will be granted to Streetlight On-Demand as the advisor to achieve the goal in signed Investment Policy Statement. Streetlight On-Demand managed accounts have authority to make investment decisions given the goal client has agreed to in Investment Policy Statement.

Clients will receive proxy materials directly from the account custodian. Should Streetlight On-Demand receive any written or electronic proxy materials, we shall forward them directly to clients via mail and/or electronic document vault on the website.

Item 15 – Financial Information

Streetlight On-Demand will communicate all industry required financial information about its company and owners. Streetlight On-Demand, its employees and owners are not subject to any bankruptcy or financial compromise of any kind.

Item 16 – Privacy Policy

Streetlight On-Demand is committed to safeguarding the use of your personal information to the highest of standards. Our goal is to help educate clients, calculate financial goals and objectives and partner with clients to achieve these objectives. We are required to collect certain information from clients in order establish accounts and maintain accounts with Federal and State laws. We are will additionally be collecting information about clients to set respective goals to accomplish together. While this data will be retained using secure electronic means and technology, any information we receive is only for:

- Purposes serve clients to best of our ability through this website and service

- Required by regulations in financial services industry

We will need to share client non-public information with our non-affiliated third-party vendors to provide technology, client access, support, investment account establishment and insurance products. Streetlight On-Demand does not intend to share any client non-public information for marketing purposes or any other purpose other than to serve our clients withing this financial planning engagement.

State Specific Regulations:

Massachusetts: In response to a Massachusetts law, clients must “opt-in” to share non-public personal information with non-affiliated third parties before any personal information is disclosed. We may disclose non-public personal information to other financial institutions with whom we have joint business arrangements for proper business purposes in connection with the management or servicing of your account.