

Solos Advisor LLC

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November 5, 2021

Item 1: Firm Brochure (Form ADV Part 2A)

This brochure provides information about the qualifications and business practices of Solos Advisor, LLC. If you have any questions about the contents of this brochure, please contact us at the phone number listed above. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Registration (e.g. “registered investment advisor”) does not imply a certain level of skill or training.

Additional information about Solos Advisor, LLC also is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2: Material Changes

Pursuant to SEC rules, Solos Advisor, LLC will ensure that clients receive a summary of any material changes to this and subsequent disclosure brochures within 120 days after the Firm's fiscal year end, December 31. This means that if there were any material changes over the past year, clients will receive a summary of those changes no later than April 30. At that time, Solos Advisor will also offer a copy of its most current disclosure brochure and may also provide other ongoing disclosure information about material changes as necessary. If there are no material changes over the past year, no notices will be sent.

Clients and prospective clients can always receive the most current disclosure brochure for Solos Advisor at any time by contacting their investment advisor representative.

This is a new brochure as of November 5, 2021.

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Item 4 Advisory Business

A. FIRM DESCRIPTION

Solos Advisor, LLC (“Solos” or the “Firm”) is a SEC registered investment advisor. Solos was founded in July 2021.

The Principal Owner and Chief Compliance Officer of the Firm is Weili Dong.

B. TYPES OF ADVISORY SERVICES

Solos specializes in quantitative and fundamental analysis to determine what investments are in favor of Solos investment models. Investment opportunities are designed for Clients to make long-term investments in diversified portfolios.

Solos assesses Clients’ holdings and ensures alignment with both short- and long-term goals. The Firm performs ongoing reviews of investment performance and portfolio exposure to align with Clients’ profiles and takes into consideration market conditions. Accordingly, the Firm is authorized to perform various functions without further approval from the Clients, such as the determination of securities to be purchased or sold without prior permission from the Clients for each transaction. Any and all trades are made in the best interest of the Clients as part of Solos fiduciary duty. However, risk is inherent to any investing strategy and model. Therefore, Solos does not guarantee any results or future returns.

Based on the information that each of the Clients enters on Solos mobile or web-based application during the account opening process, Solos will utilize its proprietary software algorithm to match each Client with the initial portfolio best suited to meet the individual Client’s investment goals. Each Client, upon being onboarded into Solos, is asked a set of questions. These questions may include behavioral questions such as how a Client views risk to assess their tolerance for risk. The algorithm then balances that analysis with the Client’s expectations for portfolio growth. Combined with additional Client feedback on when the Client expects to reach retirement age, Solos algorithm then categorizes the Client into an initial portfolio that is suitable for their individual investment time frame.

Brokerage accounts, agreements, and order processing will be conducted through Apex. Using Apex’s application program interface (“API”), Solos Advisor allows Clients to create an investment account easily online. All account opening functionalities, including identity verification and approval, are handled digitally and instantly by Apex. Apex will also provide custody, clearing, and settlement services for Solo Advisers’ Clients. The investments in each Client’s account are held in a separate account in the name of the Client at Apex, and not with Solos Advisor.

Solos Advisor’ investment objective is to seek maximum long-term, risk-adjusted, after-tax; net of fee returns. Each individualized 401(k) or IRA account allows clients to choose between portfolios we recommend and the ability to customize our recommendations. Our recommended portfolios are designed to maximize returns for Clients’ individual risk tolerances. Solos Advisor creates an investment plan and manages a Client’s portfolio by identifying: 1) optimal asset classes in which to invest, 2) efficient exchange traded funds (“ETFs”) or other investments to represent each of those asset classes, and 3) an ideal mix of asset classes based on the Client’s specific risk tolerance. Clients who choose to customize our recommendations can make adjustments to our recommended investment allocations, increasing or decreasing the target percentage of a particular ETF or investment. Clients can also choose from a list of additional ETFs or other investments and request specific allocations to each. Solos Advisor utilizes software to conduct this trading to invest Client deposits, fund Client withdrawals, perform rebalancing to maintain target portfolio allocations, and execute tax-loss harvesting strategies.

Financial Planning Service Through Software

In addition to investment advisory and portfolio management services, Solos Advisor also provides certain software-based financial planning tools and services (the “Financial Planning Service”) to its Clients. The Financial Planning Service is a product offered by Solos and is made available to Solos Advisor’s Clients free of charge. The Financial Planning Service allows Clients to explore potential future financial scenarios, including change in employment status and income, and provide recommendations for tax & retirement planning. Solos Advisor do not represent that the Financial Planning Service is meant to replace a comprehensive evaluation of a Client’s entire financial plan considering all the Client’s circumstances. Should a Client choose to implement any recommendation made by the Financial Planning Service, the Client should consult with their tax advisor regarding the Client’s personal circumstances. Implementation of a financial plan recommendation is entirely at the Client’s discretion, and currently information Clients enter into the financial planning model does not automatically change their risk scores. Clients can only change their risk scores by changing their personal financial information through the Site. While the data provided by clients used in the financial models of the Financial Planning Service is believed to be reliable, Solos Advisor or Solos Software cannot ensure the accuracy or completeness of data provided by clients.

C. SERVICES TAILORED TO CLIENTS’ NEEDS

Solos Advisor tailors its software-based investment advisory service to the individual needs of each of its Clients, in accordance with the portfolio allocation chosen by Clients, and subject to certain account limitations that prospective investors should consider, as described further below and in Item 7. Solos Advisor algorithm utilizes the information provided by each Client regarding the Client’s current financial situation, goals, and risk tolerances. Solos Advisor asks each prospective Client a series of questions to evaluate both the individual’s objective capacity to take risk and subjective willingness to take risk. We ask subjective risk questions to determine both the level of risk an individual is willing to take and the consistency among the answers. We ask objective questions to estimate with as few questions as possible whether an individual is likely to have enough money saved at retirement to afford their likely spending needs.

D. WRAP FEE PROGRAM VERSUS PORTFOLIO MANAGEMENT PROGRAM

Solos does not offer a Wrap Fee Program.

E. ASSETS UNDER MANAGEMENT

As of November 5, 2021, Adviser has the following assets under management:

Discretionary assets:	\$0
Non-discretionary assets:	\$0

Item 5 Fees and Compensation

In addition to the information provided in the Advisory Business section, this section provides details regarding Firm services along with descriptions of each service’s fees and compensation arrangements.

A. ADVISORY SERVICES COMPENSATION DESCRIPTION

Solos Advisor is compensated for its advisory services by charging an annual fee of 0.25% on the net market value of a Client’s Account. This fee applies whether Clients choose portfolios we recommend or choose to customize our recommendations. Solos Advisor reserves the right, in its sole discretion, to negotiate, reduce or waive the advisory fee for certain Client Accounts for any period of time determined solely by Solos Advisor. In

addition, Solos Advisor may reduce or waive its fees for the Accounts of some Clients without notice to, or fee adjustment for, other Clients.

Financial Planning Services

Solos Advisor offers the Financial Planning Service, as described above in Item 4, to all Clients free of charge.

B. PAYMENT OF FEES

Solos Advisor's software-based investment advisory service charges an annual fee of 0.25% based on a Client's assets under management. In some cases, Clients can have a portion of their assets managed for free. Annual fees are charged on a monthly basis as explained below.

Solos Advisor's fees are not charged in advance and are calculated on a continuous basis and deducted from Clients' Accounts each month as follows: Solos Advisor calculates a daily advisory fee, which is equal to the fee rate multiplied by the net market value of the Client's Account as of the close of trading on the New York Stock Exchange ("NYSE") (herein, "close of markets") on such day, or as of the close of markets on the immediately preceding trading day for any day when the NYSE is closed, and then divided by 365 (or 366 in any leap year). The advisory fee for a calendar month is equal to the total of the daily fees calculated during that month (less any deductions or fee waivers) and is deducted from Client Accounts no later than the tenth business day of the following month.

C. OUTSIDE FEES

Most of the investment expenses that are typically paid by investors, such as transaction and trading costs related to purchases or sales of securities, investment advisory fees, brokerage fees and account maintenance expenses are included in the Solos monthly fee charged to Clients.

The qualified custodian that Solos partners with to provide custody of Clients' assets may charge ancillary or miscellaneous transaction fees that are passed through to the client on Account closing, outgoing asset transfers, in-kind withdrawals, electronic funds transfers and for requesting paper documents. From time to time, in their sole discretion, Solos and/or the qualified custodian may waive or adjust the amounts or types of fees it charges for ancillary services. Fees for ancillary services will be deducted from the Client's Account, typically in the same manner as the Client is charged for the Solos advisory services fee.

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

Solos does not charge or accept performance-based fees.

Item 7 Types of Clients

Solos investment App is available to individuals and high-net worth individuals.

A. MINIMUM ACCOUNT SIZE

The minimum amount required to open and maintain an account with Solos Advisor is \$500.

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

A. METHODS OF ANALYSIS

A. Describe the methods of analysis and investment strategies you use in formulating investment advice or managing assets.

Solo Advisers' recommended portfolios are based on Black-Litterman Model (BLM). The Black-Litterman Model begins with Modern Portfolio Theory ("MPT") and adds investor's views of expected return. Like MPT, BLM first attempts to maximize a portfolio's expected return for a given amount of portfolio risk by selecting the proportions of various asset classes rather than selecting individual securities. It starts from a neutral position using modern portfolio theory (MPT), and then takes additional input from investors' views to determine how the ultimate asset allocation should deviate from the initial portfolio weights. It then undergoes a process of mean-variance optimization (MVO) to maximize expected return given one's objective risk tolerance.

To employ BLM properly, Solos Advisor start with an accurate determination of an individual's objective and subjective tolerance for risk. Achieving accuracy requires sophisticated software applied to more detailed questions than are typically asked by advisers. Based on this risk analysis, Solos Advisor seeks to create an individualized investment plan using the optimal asset classes in which to invest, the most efficient and inexpensive ETFs to represent each of those asset classes, and the ideal mix of asset classes based on the Client's specific risk tolerance. Solos Advisor uses Mean Variance Optimization to rigorously evaluate every possible combination of the following twelve asset classes: US equities, foreign developed markets equities, emerging markets equities, dividend growth equities, real estate, natural resources, treasury inflation protected securities (TIPS), municipal bonds, corporate bonds, emerging markets bonds, risk parity and US government bonds. Mean Variance Optimization uses the expected return and volatility for each asset class and the covariance among asset classes to find the combination that delivers the highest possible return for any given standard deviation of a portfolio's returns. We look for ETFs that minimize cost and tracking error and offer market liquidity. In addition, we choose ETFs that are expected to have sufficient liquidity to allow Client withdrawals at any time. Finally, we select ETFs that have conservative and shareholder-friendly securities lending policies.

Solos Advisor continuously monitors our Clients' portfolios and periodically rebalances them back to the Clients' target mix in an effort to optimize returns for the intended level of risk. Solos Advisor may consider the volatility associated with each of the chosen asset classes when deciding when and how to rebalance, however no assurance can be made by Solos Advisor that Clients will not incur capital gains, and in certain instances significant capital gains, when Client portfolios are rebalanced periodically. Solos Advisor assumes no responsibility to its Clients for any tax consequences of any transaction, including any capital gains that may result from the rebalancing of Client Accounts.

B. RISK OF LOSS

Investing inherently involves risk up to and including loss of the principal sum. Further, past performance of any security is not necessarily indicative of future results. Therefore, future performance of any specific investment or investment strategy based on past performance should not be assumed as a guarantee. Solos does not provide any representation or guarantee that the financial goals of clients will be achieved.

The potential return or gain and potential risk or loss of an investment varies, generally speaking, with the type of product invested in. Below is an overview of the types of products available on the market and the associated risks of each:

General Risks. Investing in securities always involves risk of loss that you should be prepared to bear. We do not represent or guarantee that our services or methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to market corrections or declines. We cannot offer any guarantees or promises that your financial goals and objectives can or will be met. Past performance is in no way an indication of future performance. We also cannot assure that third parties will satisfy their obligations in a timely manner or perform as expected or marketed.

General Market Risk. Investment returns will fluctuate based upon changes in the value of the portfolio securities. Certain securities held may be worth less than the price originally paid for them, or less than they were worth at an earlier time.

Common Stocks. Investments in common stocks, both directly and indirectly through investment in shares of ETFs, may fluctuate in value in response to many factors, including, but not limited to, the activities of the individual companies, general market and economic conditions, interest rates, and specific industry changes. Such price fluctuations subject certain strategies to potential losses. During temporary or extended bear markets, the value of common stocks will decline, which could also result in losses for each strategy.

Portfolio Turnover Risk. High rates of portfolio turnover could lower performance of an investment strategy due to increased costs and may result in the realization of capital gains. If an investment strategy realizes capital gains when it sells its portfolio investments, it will increase taxable distributions to you. High rates of portfolio turnover in a given year would likely result in short-term capital gains and under current tax law you would be taxed on short-term capital gains at ordinary income tax rates, if held in a taxable account.

Non-Diversified Strategy Risk. Some investment strategies may be non-diversified (e.g., investing a greater percentage of portfolio assets in a particular issuer and owning fewer securities than a diversified strategy). Accordingly, each such strategy is subject to the risk that a large loss in an individual issuer will cause a greater loss than it would if the strategy held a larger number of securities or smaller positions sizes.

Model Risk. Financial and economic data series are subject to regime shifts, meaning past information may lack value under future market conditions. Models are based upon assumptions that may prove invalid or incorrect under many market environments. We may use certain model outputs to help identify market opportunities and/or to make certain asset allocation decisions. There is no guarantee any model will work under all market conditions. For this reason, we include model related results as part of our investment decision process but we often weigh professional judgment more heavily in making trades or asset allocations.

ETF Risks, including Net Asset Valuations and Tracking Error. An ETF's performance may not exactly match the performance of the index or market benchmark that the ETF is designed to track because 1) the ETF will incur expenses and transaction costs not incurred by any applicable index or market benchmark; 2) certain securities comprising the index or market benchmark tracked by the ETF may, from time to time, temporarily be unavailable; and 3) supply and demand in the market for either the ETF and/or for the securities held by the ETF may cause the ETF shares to trade at a premium or discount to the actual net asset value of the securities owned by the ETF. Certain ETF strategies may from time to time include the purchase of fixed income, commodities, foreign securities, American Depositary Receipts, or other securities for which expenses and commission rates could be higher than normally charged for exchange-traded equity securities, and for which market quotations or valuation may be limited or inaccurate. Clients should be aware that to the extent they invest in ETF securities they will pay two levels of advisory compensation – advisory fees charged by Adviser plus any advisory fees charged by the issuer of the ETF. This scenario may cause a higher advisory cost (and potentially lower investment returns) than if a Client purchased the ETF directly. An ETF typically includes embedded expenses that may reduce the ETF's net asset value, and therefore directly affect the ETF's performance and indirectly affect a Client's portfolio performance or an index benchmark comparison. Expenses of the ETF may include investment advisor management fees, custodian fees, brokerage commissions, and legal and accounting fees. ETF expenses may change from time to time at the sole discretion of the ETF issuer. ETF tracking error and expenses may vary.

Inflation, Currency, and Interest Rate Risks. Security prices and portfolio returns will likely vary in response to changes in inflation and interest rates. Inflation causes the value of future dollars to be worth less and may reduce the purchasing power of an investor's future interest payments and principal. Inflation also generally leads to higher interest rates, which in turn may cause the value of many types of fixed income investments to

decline. In addition, the relative value of the U.S. dollar-denominated assets primarily managed by Adviser may be affected by the risk that currency devaluations affect Client purchasing power.

Liquidity Risk. Liquidity is the ability to readily convert an investment into cash to prevent a loss, realize an anticipated profit, or otherwise transfer funds out of the particular investment. Generally, investments are more liquid if the investment has an established market of purchasers and sellers, such as a stock or bond listed on a national securities exchange. Conversely, investments that do not have an established market of purchasers and sellers may be considered illiquid. Your investment in illiquid investments may be for an indefinite time, because of the lack of purchasers willing to convert your investment to cash or other assets.

Legislative and Tax Risk. Performance may directly or indirectly be affected by government legislation or regulation, which may include, but is not limited to: changes in investment advisor or securities trading regulation; change in the U.S. government's guarantee of ultimate payment of principal and interest on certain government securities; and changes in the tax code that could affect interest income, income characterization and/or tax reporting obligations, particularly for options, swaps, master limited partnerships, Real Estate Investment Trust, Exchange Traded Products/Funds/ Securities. We do not engage in tax planning, and in certain circumstances a Client may incur taxable income on their investments without a cash distribution to pay the tax due. Clients and their personal tax advisors are responsible for how the transactions in their account are reported to the IRS or any other taxing authority.

Foreign Investing and Emerging Markets Risk. Foreign investing involves risks not typically associated with U.S. investments, and the risks may be exacerbated further in emerging market countries. These risks may include, among others, adverse fluctuations in foreign currency values, as well as adverse political, social and economic developments affecting one or more foreign countries. In addition, foreign investing may involve less publicly available information and more volatile or less liquid securities markets, particularly in markets that trade a small number of securities, have unstable governments, or involve limited industry. Investments in foreign countries could be affected by factors not present in the U.S., such as restrictions on receiving the investment proceeds from a foreign country, foreign tax laws or tax withholding requirements, unique trade clearance or settlement procedures, and potential difficulties in enforcing contractual obligations or other legal rules that jeopardize shareholder protection. Foreign accounting may be less transparent than U.S. accounting practices and foreign regulation may be inadequate or irregular.

Information Security Risk. We may be susceptible to risks to the confidentiality and security of its operations and proprietary and customer information. Information risks, including theft or corruption of electronically stored data, denial of service attacks on our website or websites of our third-party service providers, and the unauthorized release of confidential information are a few of the more common risks faced by us and other investment advisers. Data security breaches of our electronic data infrastructure could have the effect of disrupting our operations and compromising our customers' confidential and personally identifiable information. Such breaches could result in an inability of us to conduct business, potential losses, including identity theft and theft of investment funds from customers, and other adverse consequences to customers. We have taken and will continue to take steps to detect and limit the risks associated with these threats.

Tax Risks. Tax laws and regulations applicable to an account with Adviser may be subject to change and unanticipated tax liabilities may be incurred by an investor as a result of such changes. In addition, customers may experience adverse tax consequences from the early assignment of options purchased for a customer's account. Customers should consult their out tax advisers and counsel to determine the potential tax-related consequences of investing.

Advisory Risk. There is no guarantee that our judgment or investment decisions on behalf of particular any account will necessarily produce the intended results. Our judgment may prove to be incorrect, and an account might not achieve her investment objectives. In addition, it is possible that we may experience computer equipment failure, loss of internet access, viruses, or other events that may impair access to accounts'

custodians' software. Adviser and its representatives are not responsible to any account for losses unless caused by Adviser breaching our fiduciary duty.

Dependence on Key Employees. An accounts success depends, in part, upon the ability of our key professionals to achieve the targeted investment goals. The loss of any of these key personnel could adversely impact the ability to achieve such investment goals and objectives of the account.

Operating Risks. Solos is subject to various risks in relation to operating its business, including risks associated with changes in the regulatory environment in which the Firm operates, information security risk, privacy risk, cyber risk, COVID risk, and reliance on third party risk, among other operating risks.

Information Security Risk. Solos may be susceptible to risks to the confidentiality and security of its operations and proprietary and customer information. Information risks, including theft or corruption of electronically stored data, denial of service attacks on our website or websites of our third-party service providers, and the unauthorized release of confidential information are a few of the more common risks faced by the Firm and other investment advisers. Data security breaches of our electronic data infrastructure could have the effect of disrupting our operations and compromising our customers' confidential and personally identifiable information. Such breaches could result in an inability to conduct business, potential losses, including identity theft and theft of investment funds from customers, and other adverse consequences to customers. We have taken and will continue to take steps to detect and limit the risks associated with these threats.

Item 9 Disciplinary Information

Registered investment advisers are required to disclose any legal or disciplinary events that are material to a client's or prospective client's evaluation of the advisory business or integrity of the Firm's management.

Solos has no disciplinary disclosures. Weili Dong, the owner and operator of Solos, has no disciplinary disclosures.

Item 10 Other Financial Industry Activities and Affiliations

A. REGISTRATION AS A BROKER/DEALER OR BROKER/DEALER REPRESENTATIVE

Solos is not registered and does not have an application pending to register, as a broker dealer and its management persons are not registered as broker/dealer representative.

B. REGISTRATION AS A FUTURES COMMISSION MERCHANT, COMMODITY POOL OPERATOR

Solos and its management persons are not registered and do not have application pending to register, as a futures commission merchant, commodity pool operator/advisor.

C. RELATIONSHIPS MATERIAL TO THIS ADVISORY BUSINESS AND POSSIBLE CONFLICTS OF INTEREST

Neither Solos nor its representatives have any material relationships to this advisory business that would present a possible conflict of interest.

D. SELECTION OF OTHER ADVISORS

Solos does not recommend or select other investment advisers for its clients.

Item 11 Code of Ethics, Conflicts of Interest, and Personal Trading

A. Fiduciary Status

According to SEC law, an investment advisor is considered a fiduciary. As a fiduciary, it is an investment advisor's responsibility to provide fair and full disclosure of all material facts. In addition, an investment advisor has a duty of utmost good faith to act solely in the best interest of each of its clients. Solos and its representatives have a fiduciary duty to all clients. Solos and its representatives' fiduciary duty to clients is considered the core underlying principle for Solos's Code of Ethics and represents the expected basis for all representatives' dealings with clients. Solos has the responsibility to ensure that the interests of clients are placed ahead of it or its representatives' own investment interest. All representatives will conduct business in an honest, ethical, and fair manner. All representatives will comply with all federal and state securities laws at all times. Full disclosure of all material facts and potential conflicts of interest will be provided to clients prior to services being conducted. All representatives have a responsibility to avoid circumstances that might negatively affect or appear to affect the representatives' duty of complete loyalty to their clients.

B. PERSONAL TRADING

Adviser and/or its investment advisory representatives may from time-to-time purchase or sell products or investments that they may recommend to clients. Adviser has adopted a Code of Ethics that sets forth the basic policies of ethical conduct for all managers, officers, and employees of the adviser.

In addition, the Code of Ethics governs personal trading by each employee of Adviser deemed to be an Access Person and is intended to ensure that securities transactions effected by Access Persons of Adviser are conducted in a manner that avoids any actual or potential conflict of interest between such persons and clients of the adviser or its affiliates.

Adviser collects and maintains records of securities holdings and securities transactions effected by Access Persons. These records are reviewed to identify and resolve potential conflicts of interest. Adviser's Code of Ethics is available upon request.

Item 12 Brokerage Practices

We seek to use a custodian/broker who will hold Client assets and execute transactions on terms that are overall most advantageous when compared with other available providers and their services. We consider a wide range of factors, including the capability to execute, clear, and settle trades (buy and sell securities for Client accounts), capabilities to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.), availability of investment research and tools that assist us in making investment decisions, quality of services, competitiveness of the price of those services, reputation, financial strength, and stability of the provider.

Duty to Seek Best Execution

Solos Advisor's use of Apex will comply with its duty to obtain "best execution." In seeking best execution, the determinative factor is not just cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of the broker's services described above. To participate in the Program, Clients must direct all brokerage transactions for their accounts to Apex. Clients cannot designate or select a different broker for trade execution. Solos Advisor may use other brokers to execute trades for Client accounts other than Apex.

A. Research And Other Soft Dollar Benefits

Soft dollar practices are arrangements whereby an investment adviser directs transactions to a broker-dealer in exchange for certain products and services that are allowable under SEC rules. Client commissions may be used to pay for brokerage and research services and products as long as they are eligible under Section 28(e) of the Exchange Act of 1934. Section 28(e) sets forth a “safe harbor,” which provides that an investment adviser that has discretion over a client account is not in breach of its fiduciary duty when paying more than the lowest commission rate available if the adviser determines in good faith that the rate paid is commensurate with the value of brokerage and research services provided by the broker-dealer.

Solos does not currently have any soft dollar benefit arrangements.

B. Brokerage For Client Referrals

Solos does not receive client referrals from third parties for recommending the use of specific broker-dealer brokerage services.

C. Directed Brokerage

Securities transactions are executed by brokers selected by Solos in its discretion and without the consent of Clients. Solos generally does not offer client directed brokerage services.

D. Order Aggregation

Solos may, at times, aggregate sale and purchase orders of securities (“block trading”) for advisory accounts with similar orders in order to obtain the best pricing averages and minimize trading costs. This practice is reasonably likely to result in administrative convenience or an overall economic benefit to the Client. Clients also benefit relatively from better purchase or sale execution prices, or beneficial timing of transactions or a combination of these and other factors. Aggregate orders will be allocated to Client accounts in a systematic non-preferential manner. Solos may aggregate or “bunch” transactions for a Client’s account with those of other Clients in an effort to obtain the best execution under the circumstances.

E. Trade Error Policy

Solos maintains a record of any trading errors that occur in connection with investment activities of its Clients. Both gains and losses that result from a trading error made by Solos will be borne or realized by Solos.

Item 13 Review of Accounts

A. PERIODIC REVIEWS

The Firm regularly reviews and evaluates Client accounts for compliance with each Client’s investment objectives, policies and restrictions. The Firm analyzes rates of return and allocation of assets to determine model strategy effectiveness. Such reviews are conducted by the Chief Compliance Officer of Solos and shall occur at least once per calendar year.

B. INTERMITTENT REVIEW FACTORS

Intermittent reviews may be triggered by substantial market fluctuation, economic or political events, or changes in the Client’s financial status (such as retirement, termination of employment, relocation, inheritance, etc.). Clients are advised to notify Solos promptly if there are any material changes in their financial situation, investment objectives, or in the event they wish to place restrictions on their Account.

C. REPORTS

Clients may receive confirmations of purchases and sales in their Accounts and will receive, at least quarterly, electronic statements containing account information such as account value, transactions, and other relevant

information. Confirmations and statements are prepared and delivered by the qualified custodian. Solos Account statements are provided to Clients via the website on a quarterly basis.

Item 14 Client Referrals and Other Compensation

Solos Advisor and its related persons do not receive an economic benefit (such as sales awards or other prizes) from any third party for providing investment advice to Clients.

Solos Advisor offers compensation to current Clients and solicitors for referring new Clients. Solos Advisor has certain arrangements in which it pays third parties (e.g., bloggers and others) who post advertisements for Solos Advisor a flat fee per each referred Client. In addition, Solos Advisor's "refer a friend" or similar program offers more favorable fee arrangements and/or reduced or waived advisory fees for both the referring Client and the referred Client for each referral.

New Clients are advised of the compensation before opening the account. Referring Clients and solicitors must adhere to terms and conditions established by Solos Advisor and set forth in an agreement with Solos Advisor in accordance with Securities and Exchange Commission Rule 206(4)-3 under the Advisers Act. Referrals can only be made within the Solos Advisor App or website. Clients are not charged any fee or other costs for being referred to Solos Advisor by a current Client, marketer or solicitor.

These arrangements may create an incentive for a third party or other existing Client to refer prospective Clients to Solos Advisor, even if the third party would otherwise not make the referral. These arrangements may also create a conflict of interest for a Client to maintain a certain level of assets managed through Solos Advisor if doing so would result in eligibility to receive an incentive, bonus or additional compensation.

Item 15 Custody

A. CUSTODIAN OF ASSETS

Client assets are maintained in an account at a "qualified custodian," Apex. Under Solos Advisor's Managed Account Agreement, Clients authorize us to instruct the custodian to deduct Solos Advisor's advisory fees directly from Client accounts at Apex, which is considered a form of "custody." For this reason, we are deemed to have "custody" of Client assets for this limited purpose. While Solos Advisor instructs Apex to withdraw its fees, Apex maintains actual custody of Client assets. Apex Crypto does not custody crypto assets, but instead relies on unaffiliated third parties to provide custody of crypto assets. Clients will receive account statements from Apex on a monthly basis. Account statements from Apex will reflect the withdrawal of any fees. All Clients are advised to review their account statements promptly to confirm the accuracy of the information contained. Should discrepancies or errors be found, Clients should contact Solos Advisor or Apex directly.

Item 16 Investment Discretion

Solos may exercise full discretionary authority to supervise and direct the investments of a Client's account. This authority will be granted by Clients upon completion of Solos FSA. This authority allows Solos and its affiliates to implement investment decisions without prior consultation with the Client. Such investment decisions are made in the Client's best interest and in accordance with the Client's investment objectives. Other than agreed upon subscription fees due to Solos, this discretionary authority does not grant the Firm the authority to have custody of any assets in the Client's account or to direct the delivery of any securities or the payment of any funds held in the Account to Solos. The discretionary authority granted by the Client to the Firm does not allow Solos to direct the disposition of such securities or funds to anyone except the account holder.

Item 17 Voting Client Securities

The Firm does not perform any proxy voting services on the client's behalf.

Item 18 Financial Information

A. Balance Sheet Requirement

Solos is not the qualified custodian for client funds or securities and does not require prepayment of fees of more than \$1,200 per client, six (6) months or more in advance.

B. Financial Condition

Solos does not have any financial impairment that would preclude the Firm from meeting contractual commitments to clients.

C. Bankruptcy Petition

Solos has not been the subject of a bankruptcy petition at any time during the last 10 years.