



Ameraudi Asset Management

Part 2A of Form ADV

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This brochure provides information about the qualifications and business practices of Ameraudi Asset Management, Inc. If you have any questions about the contents of this brochure, please contact us at (212) 833-1090 or customerservice@ameraudi.com. 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. Additional information about Ameraudi Asset Management, Inc. is also available on the SEC's website at www.adviserinfo.sec.gov.

Any money or securities deposited to participate in any Ameraudi investment program is not a deposit or other obligation of Interaudi Bank, the parent company of Ameraudi, and is not guaranteed by Interaudi Bank. All investments involve risk, including the possible loss of the principal amount invested. Furthermore, the term "registered investment adviser" is not intended to imply that Ameraudi Asset Management, Inc. has attained a certain level of training.

Item 2 Material Changes

Since the filing of our last annual updating amendment dated March 26, 2021, we have the following material changes to report:

We amended Item 4 to reflect that on March 17, 2022, we increased the minimum account size to \$1,000,000.

We amended Item 5 to clarify our policy related to margin billing.

We amended Item 10 to reflect discontinuation of a relationship with Bolton Global Capital.

We amended Item 4 to disclose that, for purposes of complying with the DOL's Prohibited Transaction Exemption 2020-02 ("PTE 2020-02"), when we provide investment advice to you regarding your retirement plan account or individual retirement plan account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, which are laws governing retirement accounts.

Item 3 Table Of Contents

Item 1 Cover Page	Page 1
Item 2 Material Changes	Page 2
Item 3 Table Of Contents	Page 3
Item 4 Advisory Business	Page 4
Item 5 Fees and Compensation	Page 6
Item 6 Performance-Based Fees & Side-By-Side Management	Page 9
Item 7 Types of Clients	Page 10
Item 8 Methods of Analysis, Investment Strategies and Risk of Loss	Page 10
Item 9 Disciplinary Information	Page 12
Item 10 Other Financial Industry Activities and Affiliations	Page 13
Item 11 Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	Page 14
Item 12 Brokerage Practices	Page 15
Item 13 Review of Accounts	Page 17
Item 14 Client Referrals and Other Compensation	Page 18
Item 15 Custody	Page 18
Item 16 Investment Discretion	Page 19
Item 17 Voting Client Securities	Page 19
Item 18 Financial Information	Page 20
Item 19 Requirements for State Registered Advisers	Page 20
Item 20 Additional Information	Page 20

Item 4 Advisory Business

Ameraudi Asset Management, Inc. (herein after referred to as "Ameraudi", the "Company", "we", "us" and "our") is an investment adviser formed in January, 1999 as a Delaware corporation. Ameraudi is wholly owned by Interaudi Bank, a New York State chartered FDIC bank. George J. Audi is Ameraudi's President and Andrew Schmidt is Ameraudi's Chief Compliance Officer.

Our firm assists clients with navigating global financial markets. We provide a macro-perspective on the prevailing economic environment and assist our clients with identifying suitable investment strategies that address their unique investment needs.

Ameraudi offers discretionary/managed and non-discretionary/trading portfolio management services to high net worth individuals. We may also recommend independent third-party money manager(s) to manage client portfolios.

Discretionary/Managed Portfolios - The minimum amount for a managed model portfolio is \$1,000,000. For the managed discretionary portfolio, the adviser will work with the client to determine the investment objectives, risk tolerance, asset allocation goals and time horizon. Clients have the right to place reasonable restrictions.

Non-Discretionary/Trading Portfolios - The minimum amount for a trading portfolio is \$1,000,000. Ameraudi offers a full range of investment options on a non-discretionary basis and our investment team has the ability to provide trade ideas and execution. Clients can evaluate specific trade ideas with their financial advisers and may trade individual stocks, bonds, and funds with the assistance of our team.

Third Party Managers - Ameraudi may recommend independent third party managers, when appropriate, to manage all or a portion of a client's assets. Clients are responsible for executing separate investment management agreements with the third party manager. The third party manager manages the client assets on a discretionary basis and is responsible for the implementation of the investment strategy. Although Ameraudi does not oversee the third party manager, we will monitor the activity and performance of our client's accounts and at our discretion may terminate the relationship.

When recommending an independent manager for a client, Ameraudi reviews information about the third party manager, such as their disclosure brochure and/or other material supplied by the third party manager.

Ameraudi tailors advisory services to meet the individual need of the client. In order to determine the appropriate investment strategy, we engage prospects in a pre-advisory consultation in which our advisers will communicate with prospective clients in order to determine the investment objectives, risk tolerance, asset allocation goals and time horizon. In addition to the pre-advisory consultation, we require that the client or prospect themselves or with the assistance of an adviser, complete a risk questionnaire in order to obtain a better analysis of the client's specific needs and investment goals. We utilize this information to generate an Investment Policy Statement for the client to keep for their records.

Clients may impose reasonable investment restrictions, including restrictions on particular securities or types of investments, subject to our agreement. Ameraudi requires that any requests for investment limitations or restrictions be made in writing. Clients should be aware that performance of restricted portfolios may differ from performance of portfolios without such restrictions, which may affect overall returns.

Ameraudi reviews our client portfolios through an ongoing process of assessing client objectives, developing an appropriate asset allocation to best achieve those objectives and modifying that allocation when risk/opportunities are presented. Clients should notify Ameraudi if there are changes in their financial situation or investment objectives.

Selection of Other Advisers

We may recommend that you use the services of a third party money manager ("TPMM") to manage all, or a portion of, your investment portfolio. After gathering information about your financial situation and objectives, we may recommend that you engage a specific TPMM or investment program. Factors that we take into consideration when making our recommendation(s) include, but are not limited to, the following: the TPMM's performance, methods of analysis, fees, your financial needs, investment goals, risk tolerance, and investment objectives. We will monitor the TPMM(s)' performance to ensure its management and investment style remains aligned with your investment goals and objectives.

The TPMM(s) will actively manage your portfolio and will assume discretionary investment authority over your account. We will assume discretionary authority to hire and fire TPMM(s) and/or reallocate your assets to other TPMM(s) where we deem such action appropriate.

Sub-Advisory Services to Registered Investment Advisers

We offer sub-advisory services to unaffiliated third party money managers (the "Primary Investment Adviser"). As part of these services, we will provide model portfolios, which the Primary Investment Adviser selects for their clients. We manage on both a discretionary and non-discretionary basis. We will not directly manage the Primary Investment Adviser's individual client accounts. The Primary Investment Adviser will be responsible for selecting the appropriate model for its clients.

Types of Investments

We primarily offer advice on ETFs. Refer to the *Methods of Analysis, Investment Strategies and Risk of Loss* below for additional disclosures on this topic.

Additionally, we may advise you on various types of investments based on your stated goals and objectives. We may also provide advice on any type of investment held in your portfolio at the inception of our advisory relationship.

Since our investment strategies and advice are based on each client's specific financial situation, the investment advice we provide to you may be different or conflicting with the advice we give to other clients regarding the same security or investment.

IRA Rollover Recommendations

Effective December 20, 2021 (or such later date as the US Department of Labor ("DOL") Field Assistance Bulletin 2018-02 ceases to be in effect), for purposes of complying with the DOL's Prohibited Transaction Exemption 2020-02 ("PTE 2020-02") where applicable, we are providing the following acknowledgment to you. When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. Under this special rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);

- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

We benefit financially from the rollover of your assets from a retirement account to an account that we manage or provide investment advice, because the assets increase our assets under management and, in turn, our advisory fees. As a fiduciary, we only recommend a rollover when we believe it is in your best interest.

As of January 31, 2022, Ameraudi managed regulatory assets under management of approximately \$996,686,650, of which \$452,030,968 are assets managed on a discretionary basis and \$544,655,682 are non-discretionary assets.

Item 5 Fees and Compensation

Ameraudi offers services on a fee basis. Our fee schedule is outlined in the Ameraudi Client Agreement and is shown below:

Discretionary	Incremental Annual Fee
\$20,000,000 +	0.75%
\$10,000,000 - \$20,000,000	1.00%
First \$10,000,000	1.25%

Non- Discretionary	Incremental Annual Fee
\$5,000,000 +	1.00%
\$1,000,000 - \$5,000,000	1.25%
\$500,000 - \$1,000,000	1.50%
First \$500,000	1.75%

These fees are negotiable. A lower fee rate may be granted to a client if agreed upon by Ameraudi.

Our annual management fee is a percentage of the market value of the assets under our management in accordance with the client's fee schedule. Advisory fees are prorated and paid quarterly, in advance, based upon the market value of the assets on the last day of the previous quarter as reported to Ameraudi by the custodian(s) and third party sources. Upon funding of a newly established account, the asset based fee is billed for the remainder of the current billing period and is based on the initial contribution. If cash or billable securities greater than or equaling \$50,000 are deposited or withdrawn from the account during the billing cycle, fee adjustments will be calculated pro-rata and applied to the next bill. Deposits made as a result of an internal transfer between related accounts managed by Ameraudi will not be billed as new money.

We may trade client accounts on margin. Each client must sign a separate margin agreement before margin is extended to that client account. Fees for advice and execution on these securities are based on the total asset value of the account, which includes the value of the securities purchased on margin. While a negative amount may show on a client's statement for the margined security as the result of a

lower net market value, the amount of the fee is based on the absolute market value. This creates a conflict of interest where we have an incentive to encourage the use of margin to create a higher market value and therefore receive a higher fee. The use of margin may also result in interest charges in addition to all other fees and expenses associated with the security involved. The amount of margined securities to be included in the total asset value on which fees are based is subject to negotiation.

Ameraudi considers cash to be an asset class. Depending on market conditions, investment management strategies often involve moving to cash positions for varying time periods. As a result, cash balances are included in the value of the assets under our management. The advisory fee billed to the cash portion of your holdings will exceed money market yields when rates are lower.

Our advisory fees are debited directly from the client accounts held with the custodian as per the Ameraudi Client Agreement unless otherwise instructed. If necessary, securities will be liquidated to cover our advisory fees. These fees are reflected in the custodian account statements and clients are encouraged to review these statements and promptly report any discrepancies.

Ameraudi may, at its discretion, reduce or waive minimum investment requirements, fees or trading costs. Ameraudi reserves the right to require account minimums, impose higher minimums for portfolios, terminate accounts that fall below the minimum established requirements, or require that additional funds or securities be deposited to bring an account value up to the required minimum. Ameraudi may waive account advisory fees or account minimums for employee, employee related, and affiliate employee accounts.

Certain clients may have different billing arrangements. Clients may receive comparable services from other sources for fees that are lower or higher than those charged by Ameraudi.

Mutual fund companies generally offer multiple share classes of the same fund. Share classes are described in the mutual fund's prospectus. Each share class charges different fees and internal expenses. Depending on the share class selected, fees and internal expenses charges may be higher or lower. Certain funds do not charge a transaction fee but have higher internal expenses. Selecting funds that charge higher fees and expenses may adversely impact an account's long-term performance. Ameraudi's policy is to recommend that clients invest in the lowest cost share class available based on the clients individual needs. Ameraudi generally recommends institutional or adviser share classes that typically have the lowest expense ratios and are less expensive than other share classes. Adviser and institutional share classes are generally available to investors in qualified fee-based adviser programs, or accounts that meet certain minimum investment requirements.

Ameraudi advisers are required to determine prior to recommending a mutual fund purchase whether clients are purchasing the most beneficial mutual fund share classes available. When deemed appropriate for an investor's specific situation, your adviser may at times recommend selecting or holding a mutual fund share class that charges higher internal expenses than other available share classes for the same family. Ameraudi will conduct periodic testing to ensure that the appropriate recommended share class has been selected for its clients.

For share classes transferred in from other institutions, Ameraudi will as soon as practicable evaluate whether more beneficial share classes may be available for the client to exchange at no cost and recommend that the client switch to a different lower cost share class, or may recommend liquidating the existing mutual fund holdings, which could result in the client having to pay contingent deferred sales charges, or other redemption fees.

Clients are advised that mutual funds available through Ameraudi may not offer the lowest cost mutual fund share classes available. We urge clients to carefully review the mutual fund prospectus that describes the fund's investment objectives, fees and expenses and discuss with their adviser whether lower-cost share classes are available for funds selected for the client.

Fees Charged by Financial Institutions

In addition to advisory fees, clients may incur other fees and expenses such as trading fees, mutual fund redemption fees, custody fees, wire transfer fees, trade away fees or electronic fund transfer charges, charges imposed directly by a mutual fund or ETF, safekeeping fees, transfer taxes, or other miscellaneous fees, in connection with specific services provided by the custodian(s), third party manager(s) or other service providers.

In addition to the possibility of the aforementioned fees, client accounts that utilize margin strategies will also incur interest charges. The client's margin balance is included when calculating account fees. This may pose a potential conflict of interest. Ameraudi manages this conflict of interest through disclosure so that clients can make an informed decision and through policies and procedures which require all employees to act in the client's best interest.

Third Party Management Fees

The third party manager's Form ADV Part 2A Disclosure Brochure (or Part 2A Appendix1 Wrap Fee Program Brochure) contains important information regarding the third party manager's business practices, management services, fee structures, termination provisions, strategy and other policies on how they will handle the client's account. The terms and conditions under which a client engages a Third Party Manager are set forth in a separate written agreement between the client and the Third party Manager. Ameraudi renders services to the client relative to the discretionary selection of Third Party Managers.

While we exercise our best efforts in evaluating the investment performance and cost of services offered by the third party manager(s), we make no representation that the third party manager(s) have the best investment performance or the lowest portfolio management costs. The client's selection of third party managers will be limited to those with whom we have entered into service agreements. As such, it is possible the client might be able contract similar services with equivalent performance at a lower cost.

Account Funding

Clients who elect to establish a discretionary/managed portfolio, that fund their accounts by depositing securities, authorize us to liquidate the received positions and invest in the previously selected strategy. We do not provide advice regarding the securities being liquidated nor are we responsible for any losses incurred from the liquidation of these securities. Depending on the securities involved, the holding period and other factors, liquidations may result in redemption charges and/or a taxable event. Clients should review the potential tax consequences of these liquidations with their tax adviser.

Clients funding their accounts with mutual fund shares may pay redemption fees in addition to any charges incurred on the initial purchase. Clients that hold mutual funds in their advisory account(s) incur our advisory fees in addition to the mutual fund's operating and management fees and expenses. Clients should review these costs carefully before transferring mutual fund shares into their advisory account(s).

Certain products may not be held in the account, or used to fund the account. These include insurance, annuities, private placements, certain limited partnership interests, hedge funds, commodities and futures. Clients should consult with their Financial Adviser prior to attempting to transfer such assets. The advisory fee on transferred assets is assessed as of the date the advisory agreement is executed by the client and assets are deposited into the account. Clients should review these costs carefully before transferring assets into their advisory accounts.

Retirement Account Rollovers

Prior to rolling over their retirement account assets to an IRA or other qualified account, clients should consider the underlying costs paid by and the service provided under the retirement plan, and whether it may be more economic and beneficial for the client to leave the retirement asset with the retirement plan. Clients are under no obligation to engage us to manage retirement plan assets.

There is an inherent conflict of interest when an adviser recommends a rollover. That is because typically advisers will receive a fee from rollover IRA's, but will not earn a fee if the assets are maintained in the retirement plan. Ameraudi manages this conflict of interest through disclosure so that the client can make an informed decision. Ameraudi has policies and procedures in place to monitor and prevent any actions which are not in the client's best interest.

Termination

Our Investment Advisory Agreement ("Agreement") contains the terms and conditions of an advisory relationship with us. Clients' may terminate the agreement at any time, for any reason, by written notification. Upon termination of the agreement, Ameraudi will deliver cash/and or securities as per client instructions. If securities are liquidated, clients may incur liquidation fees or contingent deferred sales charges. Depending on market conditions, a liquidation may result in a loss. In addition, the custodian, or broker liquidating the security positions may impose additional fees. If the client holds certain alternative investments and/or illiquid securities, clients may have to wait for specific redemption schedules.

Upon termination of an account, any investment management fees paid in advance will be refunded on a pro rata basis based on the number of days remaining in the billing period. In the case that funds from the terminated account are being moved or consolidated to another investment account managed by Ameraudi, a refund will not be issued, however, internally transferred assets will not be billed as new money.

In the case of accounts for deceased clients, Ameraudi will continue to manage the account and wait for instructions regarding the disposition of assets for a court appointed executor/administrator or trustee.

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

Ameraudi does not charge performance based fees, however, some third party managers offer performance-based management services that are available to clients if they meet the minimum requirements as per SEC Rule 205-3(d)(1). In order for clients to be eligible they must 1) be a client with at least \$1,000,000 under management with the third party manager 2) be a "qualified purchaser" under Section 2(a)(51)(a) of the Investment Company Act of 1940 and maintain an investment account of at least \$5,000,000 under management with the third party manager.

We encourage all eligible clients to closely review the third party manager's disclosure brochure which would include a description of the third party manager's performance-based fee structure and risks associated with the management strategy. Performance based compensation may create an incentive for third party managers to recommend investments that carry a higher degree of risk to the client. In addition to the management fee, in a performance based compensation arrangement the account may be charged an annual performance fee based on the amount that the account exceeds a predetermined benchmark.

Item 7 Types of Clients

Ameraudi typically provides its services to domestic and foreign high-net-worth individuals, corporations, and trusts. The account minimum required in order to establish a managed or trading portfolio is \$1,000,000. The account minimum required to establish a custom portfolio is \$1,000,000. Under certain circumstances, the account minimums may be lowered or waived at the sole discretion of Ameraudi.

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

Method of Analysis

Ameraudi develops client investment portfolios by incorporating the core principle of asset allocation as the most important determinant of risk exposure and investment outcomes.

Studies show that asset allocation accounts for most of the variation in portfolio returns. Individual asset classes are subject to volatile returns. With the understanding that different asset classes react in understandable ways based upon their relationship to the economic environment, a balanced and diversified portfolio premised on these structural characteristics helps to optimize and smooth out investment returns over the long term.

In consultation with our sub-adviser GenTrust LLC ("GenTrust"), Ameraudi engages a proprietary combination of fundamental, technical, and macroeconomic methods of analysis to formulate forward-looking risk, return and correlation assumptions based upon economic data and capital market assumptions.

Investment Strategies

After selecting a custom benchmark aligned with the client's desired level of risk, Ameraudi constructs a portfolio generally including commodity, equity, fixed income, and alternative exposure through efficient, low-cost, diversified index exchange traded funds (ETFs).

Ameraudi may use third party managers, individual securities, options, mutual funds if deemed appropriate to meet the client's specific investment objectives and is in the client's best interest. Margin may also be used to the extent that the client authorizes said strategy.

A custom benchmark is made up of one or more indexes or group of securities weighted to reflect a client's optimal asset allocation, risk tolerance, and investment strategy. Ameraudi then applies the appropriate weighting to each asset class.

Further to implementing asset class diversification, Ameraudi avoids concentrated exposure in any given investment sector; global diversification provides a more stable set of returns over time than concentrating a portfolio in any one country.

Ameraudi monitors portfolio performance to ensure that the investment objective of each strategy is being met.

Risks of Loss

Ameraudi seeks to implement investment strategies in discretionary and non-discretionary portfolios that adhere to the firm's core asset allocation investment philosophy designed to mitigate potential losses, but there can be no assurance that these strategies will be successful, particularly in the short term. Clients may lose all or a substantial portion of their assets. Investment performance of any kind is not guaranteed and past performance is not an indication of future results.

Investments Risks - Investments are subject to market, liquidity and volatility risks. Market risk involves factors affecting individual companies, sectors or industries that may result in a drop in the price of a security, or general market volatility due to economic risk, recession, inflation, interest rate fluctuations, or other market conditions.

Investment Strategies may rely on models and predictions regarding the performance of particular asset classes or investments generated by these models. The underlying assumptions in these models may be incomplete or inaccurate and may not perform as anticipated. Even without these limitations, the models may not perform as expected due to the unpredictability of market events. If clients choose to follow these strategies, they should be aware that there is the possibility of significant losses up to and including the possibility of the loss of all assets placed in these strategies.

Fixed-Income strategies carry interest rate and credit risk related to market volatility, the credit worthiness of the issuers and the risk of default. High-yield bond strategies invest in lower-rated debt bonds (junk bonds) and carry increased risks due to the lower credit quality of securities in the portfolio.

Leverage creates an opportunity for greater total returns, but also carries a greater risk of loss from adverse price changes. Losses from short selling may be unlimited, while losses from a cash investment are limited to the total amount invested. Ameraudi generally will not directly engage in short selling in client accounts but may invest in funds and other instruments that may engage in short selling.

Hedging includes investing in derivative securities and instruments, such as swaps, futures and options. Hedging seeks to reduce risk and increase opportunities for greater returns, but may result in significant losses.

Derivatives allow investors to hedge or speculate upon the price movements of a particular security, financial benchmark, index, currency or interest rate, at a fraction of the cost of investing in the underlying asset. Derivatives often offer significantly more market exposure than the amount invested, a relatively small adverse market movement can result in the loss of the entire investment and the possibility of a loss greater than the original amount invested.

Foreign Markets may be volatile and can decline significantly in response to adverse political, regulatory, market, or economic developments. Investing in foreign markets carries additional risks, including currency risk, political risk, and risk associated with varying accounting standards. Investments in emerging markets may increase these risks and carry additional risks, such as social instability, the risk of nationalization, expropriation or confiscation, foreign exchange controls,

restrictions on foreign investment and repatriation of capital. Securities clearing and settlement systems in emerging markets may not be fully developed and settlement delays or registration transfer issues may expose clients to illiquidity and market losses.

Alternative Investments include hedge funds, private equity, derivatives, structured products or non-traditional investments. They may carry high risks and may have complex terms and features that are not easily understood and may not be suitable for all investors. They may be suitable only for sophisticated investors that are capable of understanding and assuming the risks involved. Investing in alternative investments carries liquidity risk, high volatility, the risk of default, and loss of all assets. Clients may also be exposed to currency fluctuations because a product or an underlying investment may be denominated in a foreign currency. Foreign exchange markets are highly volatile. Significant changes in prices and liquidity can occur rapidly. Foreign exchange trading risks include; exchange controls, exchange and interest rate risk.

We may recommend the use of margin and/or investments in options, private funds such as hedge funds or private equity, based on the clients' investment objectives and risk tolerance. These investments or strategies involve a certain degree of additional risk, and are only suitable for clients that can bear the additional risks. Ameraudi or the underlying funds or third party managers may engage in strategies that involve leverage; hedging, derivatives, and foreign exchange through direct investments, indirect investments in underlying funds, investments that participate in these instruments and engage in other strategies may result in significant losses and worse performance overall.

Investments in relatively illiquid securities carry the risk of not being able to sell investments quickly or at a favorable price and may result in the loss of all or part of the investment.

Ameraudi will not be held liable for losses caused directly or indirectly by extreme market volatility or trading volumes, exchange or market rulings, trading suspensions or other conditions beyond our control such as acts of terrorism, war, or acts of nature. As previously stated, clients may lose all or a substantial portion of their assets. Investment performance of any kind is not guaranteed and past performance is not an indication of future results.

Cybersecurity

Ameraudi utilizes electronic communication networks and electronic media to maintain information regarding its clients and its business. This may create the potential for cyber security incidents or cyber-attacks that may result in the inadvertent disclosure of confidential sensitive information to unintended parties, unauthorized access to confidential sensitive information, or operation disruptions by malicious hackers. We adhere to our policies and procedures which includes maintaining technical and physical safeguards as well as other reasonable precautions to protect the confidentiality of sensitive information and internal data. However, despite reasonable precautions, the risk still remains that cybersecurity incidents may occur. If such an event were to occur, we will promptly notify the affected parties and take all appropriate actions.

Item 9 Disciplinary Information

Ameraudi has no legal or disciplinary events to report.

Item 10 Other Financial Industry Activities and Affiliations

Interaudi Bank

Ameraudi is a wholly owned subsidiary of Interaudi Bank ("Interaudi"). Interaudi is a private, commercial bank chartered by the State of New York. It was founded in 1983 by Mr. Joseph G. Audi, the Chairman, to offer comprehensive personal and commercial banking services to domestic and foreign clients. Interaudi maintains locations in New York, NY and Miami, FL.

Although Ameraudi Asset Management operates independently from Interaudi Bank, Ameraudi and Interaudi share some individuals on the board of directors. A majority of Ameraudi's clients maintain accounts at Interaudi Bank and Interaudi provides administrative and other services to Ameraudi. The relationship with Interaudi is material to our business.

There is a potential conflict of interest when Ameraudi recommends that clients use Interaudi Bank for banking products and services or when Interaudi Bank recommends Ameraudi's investment management services to bank clients as the fees paid for such services are retained by Ameraudi and its affiliate. In such cases, Ameraudi and Interaudi may be deemed to earn more compensation than if the client obtained banking products and services from an unaffiliated party. Our clients are under no obligation to bank with Interaudi Bank and are encouraged to consider other options to ensure that the products and services offered by Interaudi bank are comparable or equivalent to the products and services available from other banking institutions.

Clients of Interaudi Bank who establish a relationship with Ameraudi should be aware that such assets are not considered money or securities deposited in accounts at Interaudi Bank, they are not an obligation of Interaudi Bank and are not guaranteed by Interaudi Bank. INVESTMENT PRODUCTS ARE NOT FDIC INSURED - ARE NOT BANK GUARANTEED - MAY LOSE VALUE.

GenTrust, LLC

Ameraudi has entered into a sub advisory and service agreement with GenTrust, LLC, a third party investment adviser. The agreement with GenTrust is material to our business. The arrangement provides Ameraudi with access to third party managers, customized portfolios, and access to its custodian and clearing platforms, research, marketing material, and administrative benefits.

Custodial Relationship

Through strategic arrangements, Ameraudi offers custodian and clearing arrangements with Pershing Advisor Solutions ("PAS"), Fidelity Brokerage Services LLC ("Fidelity"), Charles Schwab ("Schwab"), StoneX Financial, Inc. (StoneX) and Interactive Brokers LLC, ("IB"), (collectively "the custodians"). Custodial services from Fidelity and Interactive Brokers are maintained through our sub-adviser, GenTrust. We do not open the account for you, although we may assist you in doing so. The custodian's platforms provide our clients and Ameraudi with certain benefits including access to institutional brokerage services, custody, clearing and reporting services, that may not be available to retail clients. They also offer online access for clients, as well as access to a wide range of investment products. Ameraudi may receive other economic benefits from the custodians in the form of support products and services they make available to us. Our custodians may pay for certain products and services for which we may otherwise have to pay such as reimbursement for account transfers or termination fees, access to research, software, educational conferences and events or other benefits.

The receipt of economic benefits from the custodians may create a potential conflict of interest. It may act as an incentive for Ameraudi to recommend the custodians and to increase assets at PAS, or Schwab in order to decrease its expenses and receive other benefits. Although we believe that these custodial arrangements are in the best interest of our clients, our clients are not obligated to use the services of PAS, Fidelity, Schwab or IB and may select a different Qualified Custodian provided that it meets Ameraudi's due diligence and other requirements.

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

We have an obligation to render continuous, unbiased investment advice, and at all times act in the clients' best interest. Ameraudi has a fiduciary duty to ensure that our clients' welfare is not subordinated to any interests of ours or any of our personnel. The following disclosures are internal guidelines we have implemented to protect our clients.

Our code of ethics sets forth the standard of conduct expected of all personnel. In accordance with Section 204A of the Investment Advisers Act of 1940, our code of ethics policy puts forth our policies and procedures which have been put in place in order to prevent personnel from abusing their inside position.

Our Personal Securities Transactions policies and procedures apply to all accounts over which employees have any beneficial ownership interest (this includes, spouses, minor children, and adults living in the same household as the associated person). Ameraudi employees are required to report any securities accounts within 10 days of becoming an employee and new accounts opened by existing employees must be reported within 30 days after account opening.

Pre-clearance is required for access persons who wish to engage in transactions involving private placements and IPOs. The Code of Ethics allows employees to invest in the same marketable securities held in clients' portfolio and does not prohibit supervised persons from trading and investing in securities that Ameraudi may recommend to its clients. While this poses a potential conflict and the possibility for abuse in that, for example, a Supervised Person may seek to benefit by trading in advance of client activity, our Code of Ethics asserts that at all times Supervised Persons must act in the client's best interest and avoid actual or any appearance of conflict of interest or impropriety. Supervised Persons trading activity is monitored by the CCO or the CCO's designee to prevent any conflict of interest and ensure that client's interests always take precedence. It is against our policies for any of our personnel to invest with clients, to advise clients to invest in a private business interest or other non- marketable investments, or initial public offerings of securities (IPOs) unless prior approval has been granted by the Chief Compliance Officer, and such investment is not in violation of any SEC and/or state rules and regulations.

Clients and prospective clients may contact Ameraudi using the information printed on the front of this disclosure brochure to request a copy of Ameraudi's Code of Ethics.

Insider Trading

Ameraudi has procedures in place to comply with the Insider Trading and Securities Fraud Enforcement Act of 1988. All employees, including contract, temporary, part time or any other associated persons are strictly prohibited from trading or recommending trading in securities for any account (personal or client) while in possession of material, non-public information about the issuer of the securities. They may not communicate non-public information about the issuer of any securities to any other person under any circumstance.

Item 12 Brokerage Practices

We recommend the brokerage and custodial services of Pershing Advisor Solutions, Charles Schwab & Co., Inc., and StoneX Financial, Inc. (whether one or more "Custodian"). Your assets must be maintained in an account at a "qualified custodian," generally a broker-dealer or bank. In recognition of the value of the services the Custodian provides, you may pay higher commissions and/or trading costs than those that may be available elsewhere. Our selection of custodian is based on many factors, including the level of services and types of products provided, the custodian's financial stability, and the cost of services provided by the custodian to our clients, which includes the yield on cash sweep choices, commissions, custody fees and other fees or expenses.

We seek to recommend a custodian/broker that will hold your assets and execute transactions on terms that are, overall, the most favorable compared to other available providers and their services. We consider various factors, including:

- Capability to buy and sell securities for your account itself or to facilitate such services.
- The likelihood that your trades will be executed.
- Availability of investment research and tools.
- Overall quality of services.
- Competitiveness of price.
- Reputation, financial strength, and stability.
- Existing relationship with our firm and our other clients.

Research and Other Soft Dollar Benefits

We do not have any soft dollar arrangements.

Economic Benefits

As a registered investment adviser, we have access to the institutional platform of your account custodian. As such, we will also have access to research products and services from your account custodian and/or other brokerage firm. These products may include financial publications, information about particular companies and industries, research software, and other products or services that provide lawful and appropriate assistance to our firm in the performance of our investment decision-making responsibilities. Such research products and services are provided to all investment advisers that utilize the institutional services platforms of these firms, and are not considered to be paid for with soft dollars. However, you should be aware that the commissions charged by a particular broker for a particular transaction or set of transactions may be greater than the amounts another broker who did not provide research services or products might charge.

Recommendation of Prime Broker

In some circumstances, where a client has not previously made custodial arrangements, we may suggest that the client use a particular broker-dealer to act as custodian for the funds and securities we manage. In those cases, we generally only recommend broker-dealers capable of acting as a "prime broker." Under "prime broker" arrangements, the firm may, on a transaction-by-transaction basis, either use the "prime broker"/custodian or select other broker-dealers, who will execute transactions for settlement into the client's "prime brokerage" account. In making suggestions as to "prime broker"/custodians, we will consider, among other things, the clearance and settlement capabilities of the broker-dealer where other broker-dealers execute transactions, the broker-dealer's ability to provide effective and efficient reporting to the client and our firm, the broker-dealer's reliability and financial stability, and the likelihood that the broker-dealer will often be chosen as executing broker-dealer on the basis of the considerations described above, including the prospects that the broker-dealer will provide valuable research services and products.

Brokerage for Client Referrals

We do not receive client referrals from broker-dealers in exchange for cash or other compensation, such as brokerage services or research.

Directed Brokerage

In limited circumstances, and at our discretion, some clients may instruct our firm to use one or more particular brokers for the transactions in their accounts. If you choose to direct our firm to use a particular broker, you should understand that this might prevent our firm from aggregating trades with other client accounts or from effectively negotiating brokerage commissions on your behalf. This practice may also prevent our firm from obtaining favorable net price and execution. Thus, when directing brokerage business, you should consider whether the commission expenses, execution, clearance, and settlement capabilities that you will obtain through your broker are adequately favorable in comparison to those that we would otherwise obtain for you.

Trade Errors

In the event a trading error occurs in your account, our policy is to restore your account to the position it should have been in had the trading error not occurred. Depending on the circumstances, corrective actions may include canceling the trade, adjusting an allocation, and/or reimbursing the account.

Aggregated Trades

We combine multiple orders for shares of the same securities purchased for discretionary advisory accounts we manage (this practice is commonly referred to as "aggregated trading"). We will then distribute a portion of the shares to participating accounts in a fair and equitable manner. Generally, participating accounts will pay a fixed transaction cost regardless of the number of shares transacted. In certain cases, each participating account pays an average price per share for all transactions and pays a proportionate share of all transaction costs on any given day. In the event an order is only partially filled, the shares will be allocated to participating accounts in a fair and equitable manner, typically in proportion to the size of each client's order. Accounts owned by our firm or persons associated with our firm may participate in aggregated trading with your accounts; however, they will not be given preferential treatment.

We do not aggregate trades for non-discretionary accounts. Accordingly, non-discretionary accounts may pay different costs than discretionary accounts pay. If you enter into non-discretionary arrangements with our firm, we may not be able to buy and sell the same quantities of securities for you and you may pay higher commissions, fees, and/or transaction costs than clients who enter into discretionary arrangements with our firm.

Mutual Fund Share Classes

Mutual funds are sold with different share classes, which carry different cost structures. Each available share class is described in the mutual fund's prospectus. When we purchase, or recommend the purchase of, mutual funds for a client, we select the share class that is deemed to be in the client's best interest, taking into consideration cost, tax implications, and other factors. When the fund is available for purchase at net asset value, we will purchase, or recommend the purchase of, the fund at net asset value. We also review the mutual funds held in accounts that come under our management to determine whether a more beneficial share class is available, considering cost, tax implications, and the impact of contingent deferred sales charges.

Item 13 Review of Accounts

Portfolio Monitoring

Client portfolios and allocation models are reviewed on an ongoing basis, and are typically subject to periodic rebalancing. Client accounts are continually monitored for, among other things, consistency of the client's investment profile with the asset allocation and investment strategy, security concentration levels and adherence to any trade restrictions. Accounts are also reviewed whenever there are changes in the client's investment objectives or profile, in connection with client meetings, or in response to market events.

Ameraudi will evaluate the performance of third party managers on a regular basis. Although Ameraudi is not involved in the day-to-day management of client assets maintained with a third party manager(s), we do evaluate the performance of client portfolios and make recommendations regarding the third party manager(s) as market factors and personal client goals may dictate.

We understand the clients' goals and tolerance for risk may change over time; therefore, Ameraudi attempts to review the client account with the client at least annually to assess their financial situation, investment objectives and any modifications to investment restrictions. In addition, material changes in their personal circumstances, the general economy, market or changes to tax law can affect the performance of their portfolio. However, it is the clients' responsibility to communicate personal life changes to us, preferably in writing, so that appropriate adjustments can be made.

In addition to the periodic account statements that the custodian sends directly to clients, clients may also receive reports from third-party money managers or administrators. Ameraudi also makes consolidated account reports available to clients. The information is available via secure online access or in hardcopy. Clients may request these periodic reviews detailing market trends and their current financial position. The information in the consolidated reports prepared by Ameraudi may vary from custodial statements due to differences in reporting dates or pricing differences. Ameraudi's consolidated statements may present account performance in relation to certain indices or benchmarks. Any benchmarks shown are presented for informational purposes only and are not a guarantee that an account will meet or exceed such benchmarks. Clients are urged to review the information in the custodian statements and consolidated reports prepared by Ameraudi and promptly notify us if they believe that they may contain errors or discrepancies.

In some cases, clients may provide Ameraudi with pricing for illiquid securities such as private placements that do not trade in the secondary market, or real assets such as real estate or artwork. These assets will be shown separately on the client reports but will not be used when calculating the client's advisory fee.

Item 14 Client Referrals and Other Compensation

Referral Compensation

Ameraudi may receive referrals of new clients from its affiliate or third parties. Ameraudi may compensate affiliated and unaffiliated persons for referring clients, in accordance with applicable law.

Ameraudi may enter into relationships with solicitors to refer prospective clients to Ameraudi. The solicitors are paid a referral fee in accordance with the requirements of Rule 206(4)-3 of the Advisers Act. Under this arrangement, the solicitors are paid a referral fee that is calculated based on a percentage of assets under management or a percentage of the advisory fees paid to Ameraudi as set forth in the Referral Agreement. This is disclosed to any client introduced by the solicitor by means of an additional disclosure document provided to the client for signature. The referral fee paid to solicitors do not result in any additional cost to Ameraudi's clients. Solicitors are not authorized to provide investment advice and may not provide investment advice on our behalf. Ameraudi has procedures in place to reasonably ensure any solicitor with which we enter into an agreement is in compliance with applicable laws and regulations.

Other Compensation

Financial Advisers may receive financial incentives or bonuses based on various factors such as production, business mix, and new assets. This may create incentives for Financial Advisers to encourage clients to purchase multiple products and services. Our Financial Advisers may receive non-cash compensation from sponsors of products distributed by us, our affiliates or other service providers such as mutual fund companies, product sponsors, third party managers, or brokers. This may include occasional meals, gifts, tickets or other entertainment, marketing support, and sponsorship support for training events. On occasion, Ameraudi's Financial Advisers may attend conferences organized by external research firms on various industries or markets. Ameraudi has policies and procedures that require our Financial Advisers to act in our client's best interests.

Ameraudi receives an economic benefit from our custodians in the form of support products and services they make available to us. In addition, our custodians may also pay for certain products and services for which we would otherwise have to pay.

Item 15 Custody

Ameraudi is deemed to have limited custody over client funds when they have authorized us and/or the third party manager to deduct advisory fee directly from their account. Ameraudi does not take possession of or maintain custody of the client's funds or securities. Client assets are maintained with an independent Qualified Custodian selected by the client. Custodial arrangements will be discussed with clients during onboarding. Although we do not hold customer funds or securities, for discretionary accounts that utilize standing letters of authorization to effect third-party transfers, the SEC has determined that in these situations, advisers are deemed to have custody of client assets. The SEC has issued a no action letter that set for the conditions and safeguards for advisers not to be subject to the technical rule requirements and it is our intention to abide by those provisions.

The custodian will send the client account statements, at least quarterly, itemizing activity and account transactions, specific investments held in the account, the value of the portfolio, deposits, withdrawals and advisory fees which occurred during the period of the statement. These statements may be delivered electronically or by postal mail as selected by the client. If clients are not receiving statements, at least quarterly, from their Qualified Custodians they should promptly inform Ameraudi.

Ameraudi may provide clients with consolidated reports or statements that may present account performance in relation to certain indices or benchmarks. This information is presented for informational purposes only and is not a guarantee that the account will meet or exceed a particular benchmark or index. While the performance of an index may reflect the investment of dividends, it does not reflect the deduction of any fees or expenses, which would reduce returns. Past performance is not a guide of future results. Clients are encouraged to carefully review the information in their custodian statements, compare the information in any reports or statements prepared by us and promptly inform us of any discrepancies.

Item 16 Investment Discretion

For accounts managed on a discretionary basis, clients provide us with a limited power of attorney to implement investment advice on a discretionary basis and take certain actions without obtaining the clients prior consent. This includes determining the type and amount of securities to be purchased or sold, the timing of the transactions and selecting broker used to effect transactions. Certain clients may impose reasonable investment restrictions that we are required to observe.

For non-discretionary accounts, we do not implement investment decisions without the client's prior consent. Consequently, there may be delays which may result in market losses or forfeited opportunities while we attempt to contact the client to obtain their consent. Clients in non-discretionary accounts make the final decisions, even though we execute the transactions with the custodian or broker, as per their instructions.

Item 17 Voting Client Securities

Ameraudi does not vote client proxies. Clients should understand and agree that they retain the right to vote all proxies, which are solicited for securities held in their accounts. Client is solely responsible for voting proxies. Ameraudi will not vote on other corporate actions or tender offers, which do not require a proxy, or are not solicited via a proxy. Ameraudi will not vote on any proxies solicited by, or with respect to, legal proceedings, including bankruptcies and class actions, or their issuers, except to the extent required by law. Correspondence related to class action lawsuits, legal proceedings, bankruptcies and proceedings involving an issuer whose equity or debt securities are held in the clients' account will be mailed directly to the client and remains the client's responsibility. Clients will receive any proxy material directly from the custodian.

Ameraudi does not evaluate whether the client holds any securities that are subject to a class action lawsuit. Ameraudi will not evaluate a client's eligibility to participate in any class action lawsuit or submit the necessary paperwork for a client to opt-in to a class action lawsuit. Such decisions shall remain with the client or an entity which they have designated. In the event that Ameraudi receives written or electronic notice of a class action lawsuit relating to a security in the client's account, Ameraudi will forward said notice to the client. Ameraudi will not provide the client with any advice about class action lawsuits.

Item 18 Financial Information

Ameraudi has not been the subject of any bankruptcy proceeding and are not aware of any financial commitments that are likely to impair our ability to meet our contractual commitments to the client. We are not aware of any financial conditions that would be likely to impair our ability to deliver contracted services to the client. Ameraudi does not require pre-payment of advisory fees greater than \$1,200 more than six months in advance.

Item 19 Requirements for State Registered Advisers

We are a federally registered investment adviser; therefore, we are not required to respond to this item.

Item 20 Additional Information

Class Action Lawsuits

We do not determine if securities held by you are the subject of a class action lawsuit or whether you are eligible to participate in class action settlements or litigation nor do we initiate or participate in litigation to recover damages on your behalf for injuries as a result of actions, misconduct, or negligence by issuers of securities held by you.

IRA Rollover Considerations

As part of our investment advisory services to you, we may recommend that you withdraw the assets from your employer's retirement plan and roll the assets over to an individual retirement account ("IRA") that we will manage on your behalf. If you elect to roll the assets to an IRA that is subject to our management, we will charge you an asset based fee as set forth in the agreement you executed with our firm. This practice presents a conflict of interest because persons providing investment advice on our behalf have an incentive to recommend a rollover to you for the purpose of generating fee based compensation rather than solely based on your needs. You are under no obligation, contractually or otherwise, to complete the rollover. Moreover, if you do complete the rollover, you are under no obligation to have the assets in an IRA managed by our firm.

Many employers permit former employees to keep their retirement assets in their company plan. Also, current employees can sometimes move assets out of their company plan before they retire or change jobs. In determining whether to complete the rollover to an IRA, and to the extent the following options are available, you should consider the costs and benefits of:

1. Leaving the funds in your employer's (former employer's) plan.
2. Moving the funds to a new employer's retirement plan.
3. Cashing out and taking a taxable distribution from the plan.
4. Rolling the funds into an IRA rollover account.

Each of these options has advantages and disadvantages and before making a change we encourage you to speak with your CPA and/or tax attorney.

If you are considering rolling over your retirement funds to an IRA for us to manage here are a few points to consider before you do so:

1. Determine whether the investment options in your employer's retirement plan address your needs or whether you might want to consider other types of investments.

- a. Employer retirement plans generally have a more limited investment menu than IRAs.
- b. Employer retirement plans may have unique investment options not available to the public such as employer securities, or previously closed funds.
- 2. Your current plan may have lower fees than our fees.
 - a. If you are interested in investing only in mutual funds, you should understand the cost structure of the share classes available in your employer's retirement plan and how the costs of those share classes compare with those available in an IRA.
 - b. You should understand the various products and services you might take advantage of at an IRA provider and the potential costs of those products and services.
- 3. Our strategy may have higher risk than the option(s) provided to you in your plan.
- 4. Your current plan may also offer financial advice.
- 5. If you keep your assets titled in a 401k or retirement account, you could potentially delay your required minimum distribution beyond age 72.
- 6. Your 401k may offer more liability protection than a rollover IRA; each state may vary.
 - a. Generally, federal law protects assets in qualified plans from creditors. Since 2005, IRA assets have been generally protected from creditors in bankruptcies. However, there can be some exceptions to the general rules so you should consult with an attorney if you are concerned about protecting your retirement plan assets from creditors.
- 7. You may be able to take out a loan on your 401k, but not from an IRA.
- 8. IRA assets can be accessed any time; however, distributions are subject to ordinary income tax and may also be subject to a 10% early distribution penalty unless they qualify for an exception such as disability, higher education expenses or the purchase of a home.
- 9. If you own company stock in your plan, you may be able to liquidate those shares at a lower capital gains tax rate.
- 10. Your plan may allow you to hire us as the manager and keep the assets titled in the plan name.

It is important that you understand the differences between these types of accounts and to decide whether a rollover is best for you. Prior to proceeding, if you have questions contact your investment adviser representative, or call our main number as listed on the cover page of this brochure.