

# Beevav Inc. - Form ADV Part 2A

*March 30, 2022*

## Item 1: Beevav Inc.

This brochure provides information about the qualifications and business practices of Beevav Inc. ("Beevav"), an investment adviser registered with the United States Securities and Exchange Commission (the "SEC"). Registration does not imply a certain level of skill or training but only indicates that Beevav has registered its business with state and federal regulatory authorities, including the SEC. The information in this brochure has not been approved or verified by the SEC or by any state securities authority.

Additional information about Beevav and our services is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching CRD #315917 and our website at [www.beevav.com](http://www.beevav.com).

If you have any questions about the contents of this brochure, please contact us at [info@Beevav.com](mailto:info@Beevav.com) or (201) 208-2568.

## Item 2: Material Changes

Not Applicable. First time filing.

Traditional, Roth, SEP (simplified employee pension), and SIMPLE (Savings incentive match plan for employees) IRA (individual retirement account) clients are encouraged to review this entire Form ADV Part 2.

## Item 3: Table of Contents

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## Important Information

Throughout this brochure, Beevav may also be referred to as “our,” “we,” or “us.” Clients or prospective clients may also be referred to as “IRA clients” or “clients”.

## Item 4: Advisory Business

This brochure is intended to help you learn more about Beevav’s IRA (Traditional, Roth, SEP & SIMPLE IRA) services. If you cannot find what you are looking for here, please direct your questions to [info@Beevav.com](mailto:info@Beevav.com), or visit our website at [www.beevav.com](http://www.beevav.com).

### A. Firm

Beevav is a Delaware corporation formed on June 14, 2021. Beevav is a privately held company headquartered in Jersey City, New Jersey. Information about Beevav’s organizational and ownership structure is provided in Part 1 of Beevav’s Form ADV, which is available online at <http://www.adviserinfo.sec.gov>.

## B. Services

### IRA Services

Beevav offers Traditional, Roth, SEP, and SIMPLE IRA (collectively “IRAs”), providing account set-up, limited administration, recordkeeping, and maintenance.

Beevav offers investment advisory services to retail investors only through Beevav interactive platform (website & mobile app). Beevav provides investment management services to IRAs, including selecting, monitoring, and managing investment menu and portfolios for the accounts. We recommend managed portfolios composed of ETFs to IRA accounts via our proprietary software. Beevav’s economic, investment, and other financial interests are not taken into consideration when making investment decisions.

## C. Client-Tailored Services and Client Restrictions

Beevav provides all investment advisory services only through our interactive platforms (website & mobile app).

### IRA Plans

Beevav offers four types of IRAs:

- Traditional IRA - an individual retirement account that allows clients to direct pre-tax income towards investments that can grow tax-deferred.
- Roth IRA - an individual retirement account that accrues gains tax-exempt using after-tax money to invest.
- SEP IRA – an individual retirement account that allows business owners to contribute SEP contributions towards traditional IRAs for their employees or self-employed owners.
- SIMPLE IRA - an individual retirement account that allows employees and employers to contribute to traditional IRAs set up for employees.

Our service includes automated investment advice to IRA clients via our proprietary software. IRA clients can choose to either invest in one of our managed portfolios - recommended by our proprietary software based on the client’s reported risk tolerance and estimated time until retirement - or they can create a custom portfolio from our investment menu.

Beevav’s account opening process is designed to provide clients an opportunity to select from a variety of investment options, including selecting managed portfolios or creating a custom portfolio. In doing this, IRA clients have the flexibility to choose any combination of the ETFs offered by Beevav, and they can change their chosen portfolio at any point.

IRA clients are able to modify their portfolios, create custom portfolios, make annual contributions, and distribute funds from their IRA accounts all through our interactive platforms.

## D. Wrap Fee Programs

In a wrap fee investment program, the investor pays one stated fee to cover management fees, transaction costs, fund expenses, and other administrative fees. Beevav does not participate in any such wrap fee program.

## E. Client Assets

As of March 30, 2022, Beevav has no asset under management

## Item 5: Fees and Compensation

### A. Fees

#### SEP & SIMPLE IRAs Plans

Beevav charges fees to the plan sponsor & plan participants (IRA clients) as set forth below. Beevav can waive any of the below fees and offer discounts at our discretion.

##### Sponsor's base fee

Per active employee (IRA Client) *	\$5/month
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##### Plan participant's (IRA Client's) fee

Annual Account Fee**	0.15%
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*\*Active employee, who has employment with the plan sponsor. We don't charge a monthly base fee to IRA clients if they discontinue employment with Beevav's SEP & SIMPLE IRAs sponsors.*

*\*\*Calculated and deducted on a monthly basis at 1/12 of the annual stated rate (0.15%) based on the account balance on the last day of each month, in arrears.*

#### Traditional & Roth IRAs Plans

Beevav charges fees to the clients as set forth below. Beevav can waive any of the below fees and offer discounts at our discretion.

##### IRA Client's fee

Annual Account Fee**	0.15%
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*\*\*Calculated and deducted on a monthly basis at 1/12 of the annual stated rate (0.15%) based on the account balance on the last day of each month, in arrears.*

Beevav provides a detailed schedule of fees charged to IRA clients and IRA sponsors upon enrollment for services. Fees are non-negotiable and may be modified during the term of the agreement with thirty (30) days advance written notice to the IRA client.

### B. Billing and Payment

Beevav monthly base fees will be itemized in a monthly invoice and delivered electronically to SEP & SIMPLE IRA sponsors following the end of the month in which services were provided. IRA clients' Funding Source (as defined in Beevav's terms of service for each service) approximately five (5) days after the invoice is issued. In the event that an error is reported after monthly base fees have been debited, resulting in an overpayment, Beevav may refund the excess payment in the form of a credit on the following month's invoice.

Beevav's annual account fee is deducted from the IRA client's account balance on a monthly basis. In the event that an error is reported after the annual account fee has been debited, resulting in an overpayment, Beevav may credit such overpayment back to the client's Beevav account balance.

### C. Third-Party Fees

Beevav does not charge our clients third-party fees.

Beevav requires our clients to use Apex Clearing (“Apex”) as their custodian. Custodian fees are paid by Beevav; clients do not pay custodian fees. However, should Beevav for any reason fail to pay the custodial fees, the IRA client agrees to pay Apex Clearing for services rendered by it based on the fee schedule in the Custodian Agreement. Apex may withdraw such compensation directly from IRA accounts assets.

IRA clients are responsible for the payment of ETFs fees (called expense ratio of ETF), which are charged directly from IRA client assets by the ETFs in which IRA clients invest. As an Investor, IRA clients don’t see those fees on their statements because ETFs reflect that in their market price.

### D. Prepayment of Fees

Beevav does not accept prepayment of fees.

### E. Compensation for the Sale of Securities to Clients

Neither Beevav nor our firm personnel receives compensation for the sale of securities or other investment products.

## Item 6: Performance-Based Fees

Neither Beevav nor our firm personnel accepts performance-based fees on a share of capital gains on, or capital appreciation of, the assets of IRA clients.

## Item 7: Types of Clients

Beevav’s clients for our SEP & SIMPLE IRA services are Individuals, business owners who may be self-employed or employees of small businesses, and other legal entities (subject to Beevav’s approval). Beevav’s clients for our Traditional & Roth IRA are individuals.

Beevav does not require a minimum dollar amount to open an IRA (Traditional, Roth, SEP & SIMPLE) account.

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

### A. Methods of Analysis and Investment Strategies

Beevav's methods of analysis include **Modern portfolio theory**. Modern portfolio theory is a theory of investment that attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, each by carefully choosing the proportions of various assets.

Beevav uses a long-term investment strategy, meaning that investments are selected based on internal research indicating that investments will increase in value over the long term. Beevav Advisors does not utilize day trading or other short-term trading strategies in its investment platform. We primarily practice **passive investment management**. Passive investing involves building portfolios that are comprised of various distinct asset classes. The asset classes are weighted in a manner to achieve the desired relationship between correlation, risk, and return. ETFs that passively capture the returns of the desired asset classes are placed in the portfolio. Beevav believes participants should have access to a range of low-fee investments with different risk, covariance, and return characteristics, allowing for the construction of diversified portfolios. Beevav believes that minimizing fees, mitigating risk through diversification, and investing for a long-term horizon are the underpinnings to successfully prepare for retirement.

### B. Material Risks

**Modern portfolio theory** assumes that investors are risk-averse, meaning that given two portfolios that offer the same expected return, investors will prefer the less risky one. Thus, an investor will only take on increased risk if compensated with higher expected returns. Investors who want higher returns will need to accept more risk. Different investors will evaluate the trade-off differently based on their own individual risk profiles. When choosing between portfolios, the implication is that rational investors will invest in portfolios with the most favorable risk-to-expected-return profiles and corresponding to their level of comfort with risk.

Investing in securities involves a risk of loss that any investor, should be prepared to bear.

"Long-term investing" is designed to capture market rates of both return and risk. Investing in the capital markets can expose investors to various types of risk that will typically surface at different intervals. These risks include but are not limited to, market risk, political and regulatory risk, interest rate risk, credit risk, economic risk, and inflation (purchasing power) risk.

### C. Risks of Specific Securities

Investors should be aware that there is a material risk of loss using any investment strategy. Our investments are not guaranteed or insured by the Federal Deposit Insurance Corporation ("FDIC") or any other government agency. Investing in the capital market carries the risk of capital loss. All ETFs have costs that lower investment returns. Primary asset classes of the ETFs represented in Beevav portfolios include stocks ("equities"), bonds ("fixed income"), and cash equivalents, which present a lower risk. The following risks may not be all-inclusive but should be considered carefully by a prospective client.

**Market Risk:** A decline in the stock market could depress the prices of equity securities in an investor's portfolio.

**Interest Rate Risk:** An increase in interest rates or a change in the relationship between different market interest rates could depress the prices of bonds and other fixed-income securities in an investor's portfolio.

**Event Risk:** An adverse event affecting a particular company or that company's industry could depress the price of investments in that company's stocks or bonds. The company, government, or other entity that issued bonds could become less able to, or fail to, repay, service, or refinance its debts, or the issuer's credit rating could be downgraded by

a rating agency. Adverse events affecting a particular country, including political and economic instability, could depress the value of investments in issuers headquartered or doing business in that country.

**Liquidity Risk:** Securities that are normally liquid may become difficult or impossible to sell at an acceptable price during periods of economic instability or other emergency conditions.

**Domestic and/or Foreign Political Risk:** Events that occur in the U.S. relating to politics, government, and elections can affect the U.S. markets. Political events occurring in the home country of a foreign company such as revolutions, nationalization, and currency collapse can have an impact on security.

**Inflation Risk:** Nations around the globe may be more, or less, prone to inflation than the U.S. economy at any given time. Companies operating in countries with higher inflation rates may find it more difficult to post a profit.

## Item 9: Disciplinary Information

### A. Criminal or Civil Actions

Beevav has no criminal or civil actions to report.

### B. Administrative Proceedings

Beevav has no administrative proceedings to report.

### C. Self-regulatory Organization (SRO) Proceedings

Beevav has no self-regulatory organization proceedings to report.

## Item 10: Other Financial Industry Activities and Affiliations

### A. Broker-Dealer or Broker-Dealer Representative Registration

Neither Beevav nor our firm personnel are registered as, or have pending applications to register as, a broker-dealer or a representative of a broker-dealer.

### B. Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor Registration

Neither Beevav nor our firm personnel are registered as, or have pending applications to register as, either a Futures Commission Merchant, Commodity Pool Operator, Commodity Trading Advisor, or an associated person of the foregoing entities.

### C. Material Relationships and Possible Conflicts of Interests

Neither Beevav nor its representatives have any conflicts of interest to disclose.



#### D. Material Conflicts of Interest from Other Investment Advisers or Managers

Beevav does not recommend or select other investment advisers for clients.

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

#### A. Code of Ethics

Beevav has a written Code of Ethics pursuant to Rule 204A-1 under the Investment Advisers of 1940, as amended (the “Advisers Act”) that covers areas such as insider trading, personal securities transactions, conflicts of interest, gifts and entertainment, service on a board of directors, recordkeeping, and violations reporting.

We periodically review and amend our Code of Ethics so that the policies and procedures remain current, and we require firm personnel to annually attest to their understanding and adherence to the Code of Ethics provisions. A copy of the firm’s Code of Ethics is made available to any client or prospective client upon request at no charge.

#### B. Recommendations Involving Material Financial Interests

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

#### C. Investing Personal Money in the Same Securities as Clients

Beevav’s representatives may buy or sell ETFs for themselves that Beevav also recommends to our clients. Though this may provide an opportunity for our representatives to buy or sell the same securities before or after Beevav recommends the same securities to IRA clients, Beevav does not believe any such transaction could potentially create a conflict of interest because all advice is generated through our proprietary system.

#### D. Trading Securities at or Around the Same Time as Clients’ Securities

From time to time, Beevav’s representatives may buy or sell securities for themselves at or around the same time as clients. Though this may provide an opportunity for our representatives to buy or sell securities before or after Beevav recommends securities to IRA clients, our representatives do not profit off of the recommendations they provide to IRA clients. Beevav does not believe such transactions could potentially create a conflict of interest because all advice is generated through our proprietary system.

## Item 12: Brokerage Practices

### A. Selection of Custodians and/or Broker-Dealers

Beevav requires our clients to use Apex Clearing as their custodian. Beevav does not maintain relationships with any other broker-dealers. In the event that we do so, Beevav is committed to negotiating reasonable fees for our clients, which includes but not limited to selecting only relatively low clearing fees.

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

### Research and Other Soft Dollar Benefits

Beevav conducts our own investment research. Currently, Beevav does not have a soft dollar program or any plans to implement one.

### Brokerage for Client Referrals

Beevav does not receive referrals from a broker-dealer and/or third party in exchange for use of that broker-dealer and/or third party's services.

### Directed Brokerage

Beevav does not allow clients to execute transactions through other specified broker-dealers.

### B. Aggregating (Block) Trading for Multiple Client Accounts

When Beevav considers it to be in your best interest, we may, but are not required to, aggregate your order for the sale or purchase of securities for your account with orders for other Clients of the Program. Under this approach, the transactions may be averaged as to the price and will be allocated among our clients in proportion to the purchase and sale orders placed for each Client account.

## **Item 13: Review of Accounts**

### **A. Frequency of Reviews and Who Makes Those Reviews**

Beevav monitors client portfolios and underlying strategies on an ongoing basis, not less than quarterly, utilizing an algorithm, to identify situations that may warrant a more detailed review or a specific action on behalf of a client. Such reviews include, but are not necessarily limited to, inactivity, unusual funding behavior, and material changes in the economic or market environment. Additionally, Beevav will contact or remind clients on an annual basis to ask if there have been any changes to their financial situation and investment objectives, and to update their information.

### **B. Factors That Trigger a Non-Periodic Review of Client Accounts**

Non-periodic reviews may be triggered by material market, economic, or political events, or by changes in IRA clients' financial situations, such as retirement, termination of employment, or disability.

### **C. Content and Frequency of Regular Reports Provided to Clients Regarding their Accounts**

Beevav provides IRA clients with a quarterly report detailing their accounts, including assets held, asset value, and calculation of fees. IRA clients may also access their account balance and transactions anytime through Beevav's website & mobile app, updated daily.

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

### **A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales, Awards, or Other Prizes)**

Beevav does not receive any economic benefit, directly or indirectly, from any third party for advice rendered to Beevav's clients.

### **B. Compensation to Non-Advisory Personnel for Client Referrals**

From time to time, Beevav may enter into written arrangements with third parties to act as solicitors for our services. Beevav may integrate our services with third-party payroll providers, benefits providers, and other service providers. Under these arrangements, Beevav agrees to compensate the third-party provider.

Compensatory relationships with third parties will be fully disclosed to each client to the extent required by applicable law. All such referral activities will be conducted in accordance with the Advisers Act Rule 206(4)-3, as applicable.

## Item 15: Custody

Beevav does not maintain custody of Client assets that we manage. Client assets are maintained in an account at a “qualified custodian,” Apex Clearing. Under Beevav’s Managed Account Agreement, Clients authorize us to instruct the custodian to deduct Beevav’s advisory fees directly from the Client account, which is considered a form of “custody.” For this reason, we are deemed to have “custody” of Client assets for this limited purpose. Beevav does not act as a “qualified custodian” but is subject to the SEC’s Custody Rule. Beevav is therefore obligated to comply with the following requirements as imposed by the Custody Rule:

- Use of “qualified custodians” to hold client’s assets. Beevav maintains client funds and securities with a “qualified custodian” that maintains the client’s funds and securities in a separate account under the client’s name.
- Client Notification. Beevav has notified the clients whose funds and securities we have custody over in writing of the qualified custodian’s name, address, and the manner in which the funds or securities are maintained.
- Account statements for clients detailing their holdings. clients will receive statements on at least a quarterly basis directly from the qualified custodian(s) that holds and maintains their investment assets. Clients are urged to carefully review all custodial statements and compare them to any reports provided by Beevav.

## Item 16: Investment Discretion

Beevav exercises discretionary trading authority with regard to funds invested in our managed portfolios. This enables Beevav to buy, sell, and specify the number of securities in IRA client’s account without first obtaining IRA client’s specific consent. This authority is limited to the transfer or exchange of IRA client funds between asset classes within ETFs and/or other securities to achieve results consistent with the goals of the IRA client’s selected investment portfolio. This discretion does not extend to IRA clients who have created a custom portfolio.

## Item 17: Voting Client Securities (Proxy Voting)

Proxy voting is carried out by the ETF sponsor for each security the ETF holds. IRA clients should direct all proxy questions to the ETF sponsor. Should an ETF require proxy votes for its own management, Beevav exercises voting authority over Client proxies pursuant to its proxy voting policies and procedures in accordance with Rule 206(4)-6 of the Advisers Act. Beevav maintains policies and procedures reasonably designed to mitigate conflicts of interest and reasonably ensure that proxy matters are conducted in the best interest of clients. Beevav will only vote on proxies and respond to corporate actions associated with securities that Beevav recommends be purchased for client accounts. Beevav will abstain from voting on such proxies if it determines that abstaining is in the best interest of its clients. Clients may request information regarding how Beevav voted a client’s proxies, and clients may request a copy of Beevav’s proxy policies and procedures, which may be updated from time to time, by emailing [info@Beevav.com](mailto:info@Beevav.com).

## **Item 18: Financial Information**

### **A. Balance Sheet**

Beevav is not required to include a balance sheet with this brochure because we neither require nor solicit prepayment of more than \$1,200 in fees per client, six months or more in advance.

### **B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients**

Neither Beevav nor our management have any financial condition that is likely to reasonably impair Beevav's ability to meet contractual commitments to clients.

### **C. Bankruptcy Petitions**

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