

Garuda Advisors

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This brochure provides information about the qualifications and business practices of Garuda Advisors. If you have any questions about the contents of this brochure, please contact us at garudaadvisors@gmail.com or (231) 855-8001. 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 Garuda Advisors also is available on the SEC's website at www.adviserinfo.sec.gov.

Garuda Advisors is an SEC-registered investment adviser. Registration does not imply any level of skill or training.

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Advisory Business

Garuda Advisors was founded in 2022 as an investment advisory business. Garuda Advisors is a sole proprietorship wholly owned by Chief Executive Officer Noah Jacobs.

Garuda Advisors offers personalized investment advice through its interactive online website and one on one communication with investors via phone calls and email. We do not offer discretionary portfolio management or market timing services, and our investment advice is limited to stocks, bonds, options, real estate, commodities, and cryptocurrencies.

Garuda Advisors' advisory services are tailored to individual clients through 1:1 conversations.

Garuda Advisors does not participate in wrap fee programs.

As of this writing, Garuda Advisors manages \$0 in client assets across both discretionary and non-discretionary accounts.

Fees and Compensation

Garuda Advisors charges an hourly rate of \$50 for investment advice.

We bill clients for fees incurred.

Clients may be required to pay custodian fees and mutual fund expenses in connection with our advisory services. Clients may also incur brokerage and other transaction costs. See the "Brokerage Practices" section of this brochure for more information.

Clients have the option to purchase investment products that we recommend through other brokers and agents that are not affiliated with Garuda Advisors.

Garuda Advisors receives no compensation in connection with the purchase or sale of securities.

Performance-Based Fees

Garuda Advisors does not accept performance-based fees of any kind.

Types of Clients

Garuda Advisors generally provides advice to individuals, with a focus on those interested primarily in capital preservation.

We have no minimum account size for opening or maintaining an account.

Methods of Analysis, Investment Strategies, and Risk of Loss

Garuda Advisors believes in diversification and time tested assets, accompanied by a small allocation to precision investments with asymmetric payouts.. Despite our best efforts, clients should be aware that any investment in securities involves risk of loss that clients should be prepared to bear.

As part of our commitment to diversification and time tested assets, Garuda Advisors recommends investments in capital intensive businesses with long term histories, as well as savings bonds from the US government when attractive rates can be found.. Still, the past is no indicator of future results, and investors may lose some or all of their investment.

As part of the precision, asymmetric investments, Garuda Advisors recommends small ($< 5\%$ of liquid net worth), high payout options investments to investors with a high risk tolerance. Options are an asset class with pricing subject to time decay and altered by volatility. Clients should be aware that options are significantly riskier than stocks and bonds. Garuda Advisors never recommends uncollateralized positions.

Disciplinary Information

Garuda Advisors has not been involved in any legal or disciplinary events that are material to a client's or prospective client's evaluation of our advisory business or the integrity of our management.

Other Financial Industry Activities and Affiliations

Garuda Advisor's sole proprietor, Noah Jacobs, is a fund manager for Noahs' Arc Capital Partners LP 1. Garuda Advisors disclose whenever there are recommendations for the purchase of specific securities that are also held or may be held by Noahs' Arc Capital Partners LP 1.

Garuda Advisors does not recommend, to any of its clients, investment in Noahs' Arc Capital Partners LP 1.

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

We are happy to provide a copy of our code of ethics to any client or prospective client upon request.

We do not participate in any client transactions.

We may buy or sell the same securities as those we recommend to our clients in personal accounts. This may create a conflict of interest if a client's transactions can affect the price of the security. To mitigate the conflict of interest, we do not allow employees of Garuda Advisors to transact in thinly-traded, low-volume securities for thirty days after recommending it to a client other than regular, scheduled purchases or sales. High-volume securities in which price impact of client transactions is close to zero (i.e. Vanguard S&P 500 mutual fund, Apple common stock, etc.) are exempt from this restriction.

Brokerage Practices

We do not receive any compensation, research, or soft-dollar benefits from broker-dealers in connection with client securities transactions. We simply recommend to clients the broker-dealers which can provide our clients with the best execution at the lowest price, favoring brokerages with commission-free trading.

We do not aggregate orders for clients because we do not execute securities trades for our clients as part of our advisory services.

Review of Accounts

We do not periodically review client accounts or financial plans. We do not provide regular reports to clients regarding their accounts.

Advice is only provided when our advisors are charging their hourly rate.

Client Referrals and Other Compensation

We do not compensate for client referrals.

Custody

We do not have custody of client funds or securities. Clients receive quarterly statements from the custodian of their choice, which is a firm such as Vanguard or Fidelity. Clients should carefully review the statements they receive from their custodian. Garuda Advisors does not send client statements.

Investment Discretion

Garuda Advisors does not accept discretionary authority to manage securities accounts on behalf of clients.

Voting Client Securities

Garuda Advisors does not accept authority to vote client securities.

Financial Information

Garuda Advisors does not require prepayment of more than \$1,200 in fees per client six months or more in advance. We do not have discretionary authority or custody of client funds or securities, and we have not been the subject of a bankruptcy petition at any time during the past ten years. As a result, we are not required to provide a balance sheet.