

# Onesta Inc.

## Part 2A Form ADV

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Part 2A of Form ADV provides information about the business practices of Onesta. If you have any questions about the contents of this brochure, please contact us at +1(619)-289-8401 or [support@onestafinance.com](mailto:support@onestafinance.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.

## Item 2: Material Changes

In March of 2023, Finance Friends changed its name to Onesta.

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## Item 4: Advisory Business

In March of 2021, Onesta (formerly Finance Friends, Inc) applied to be registered with the U.S. Securities and Exchange Commission as a registered investment advisor. In March of 2023, Finance Friends, Inc changed its name to Onesta Inc.

Onesta created and provides an interactive website to individuals and high net worth individuals (“user”) whose primary function is to advise the user in the selection of an investment advisor firm or representative (“RIA”).

Onesta processes RIA Form ADV data and makes it available on an interactive website. Onesta utilizes statistical methods to visually represent the Form ADV information made available by the SEC. When ranking and recommending RIAs, Onesta uses a combination of statistical scoring, user input, and our proprietary algorithm to rank the RIA matches. The algorithm is an automated representation of our RIA evaluation system and asymmetrical weighting of Form ADV data.

Any information collected or recommendations made to the user is performed through the interactive website. Onesta personnel will not elaborate or expand upon the investment advice provided by its interactive website, or otherwise provide investment advice to its clients, except as permitted by the de minimis exception. Additionally, Onesta does not enable personnel to ask follow-up or clarifying questions about the user’s input, address inconsistencies in the user’s input, provide assistance when filling out the questionnaire, or explain important concepts; the online disclosures and interactive website are designed to assist in these functions (more in Item 11). Any non-website communication is restricted to administrative or technical purposes.

All SEC and state registered investment adviser firms, whom the SEC has made available via Form ADV filings, are included as possible recommendations for the user. The recommendations are presented to the user through a combination of user input and algorithmic processing - a questionnaire.

After completing the questionnaire, the user is presented a ranked list of recommendations. The number of items included in the list depends entirely on the user’s input and subsequent algorithmic processing. Additionally, the algorithm has the capacity to recommend no matches if the user’s input is inconsistent or overly restrictive. In the event of a no-match, the interactive website will prompt adjustment of the user’s input.

After receiving the recommendation list, the user is presented the option to inquire further into each of the recommendations. Whether or not the RIA has an established agreement with Onesta plays no part in the ranking or recommending of RIAs.

If a user inquires about an unsigned RIA, Onesta will attempt to verify the identity and contact information of the RIA prior to the continuation of the referral process; additionally, the RIA must agree to the Onesta Fee Arrangement and Terms and Conditions to be onboarded. The process of onboarding RIAs is entirely administrative, no advisor will be denied the opportunity to join the Onesta platform for reasons other than refusing the Onesta Fee Arrangement/Term and Conditions, or failing to confirm identity.

In the situation where the inquired about RIA fails to complete the onboarding process, the user who inquired about the RIA will be made known of the RIA's refusal to complete the process and be presented the with option to either continue pursuing the RIA independently of the Onesta platform or to inquire about other advisor(s) from the recommendation list. The website's recommendation is not adjusted, amended, or otherwise altered unless done so by the user through the interactive website - re-submitting the questionnaire.

In accordance with the record keeping requirements, Onesta employs a digital user classification system that tracks which of the users are provided advice exclusively through the interactive website and which are not. The number of users to receive advice not through the interactive website will be fewer than 15 clients in the preceding 12 months according to the de minimis exception.

Onesta's services are primarily to advise about the selection of other RIAs through an interactive website. Onesta does not manage any assets. As of March 2022, Onesta manages \$0 on behalf of any clients.

## Item 5: Fees and Compensation

For services provided to RIAs, Onesta receives fees from the RIAs to whom the user was referred based on interaction with the Onesta website. Both users and RIAs must agree to the Onesta Terms and Conditions prior to engaging the respective party.

Once the RIA has received signed confirmation of the users receiving the RIA's Form ADV 2A (brochure) and the Onesta's solicitors disclosure document, and the user has become a client of the RIA; Onesta receives a portion of the ongoing management fee. The fees are based on the user's reported assets at the time of becoming a client or at mutually agreed-upon intervals.

Onesta does not charge any fees of any kind to non-advisor users of the platform. That being said, the contracted advisors might directly or indirectly pass the Onesta's fee onto the non-advisor user.

To mitigate the potential conflict of interest in referring users to advisors who pay higher fees, the referral fee schedules are not known by the algorithm when determining the order by which to present the list of matches. Nor is the in-house development team ever aware of the RIA fee schedules to avoid conscious or unconscious conflicts of interest. Additionally, Onesta has implemented a long-term,

relationship-focused, evaluation system that prioritizes the contentment of the user over fees paid to Onesta. Onesta internally rewards the long-term successful referral of users.

## Item 6: Performance-Based Fees and Side-by-Side Management

Onesta does not charge any performance fees.

## Item 7: Types of Clients

Onesta primarily provides investment advisory services to individuals and high net worth individuals. The platform has no minimum net worth requirements.

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

Onesta does not handle, invest, advise, or have custody of any user assets. Onesta created and provides an interactive, user-driven database search and a questionnaire that ranks potential RIA matches based on the user's input and algorithmic processing. The user then requests to be connected with any number of the recommended RIAs. Onesta verifies the identity of RIAs that seek to join the Onesta's referral program. To be accepted into Onesta's referral program, RIAs must agree to the Onesta's Terms and Conditions which includes the fee arrangement. Onesta verifies the identity of all RIAs on the platform with independent email verification and documentary evidence of their identity. RIAs must complete this process prior to being connected with any user.

Users visiting [onestafinance.com](http://onestafinance.com), [financeadvisormatch.com](http://financeadvisormatch.com), or [investmentadvisermatch.com](http://investmentadvisermatch.com) will be offered access to the interactive website where the user will see a list of RIAs based on the user-selected filtering options and algorithmic ranking. After identity verification and upon user request, Onesta will connect the user to one or more of the RIAs selected.

At the time the user inquires into a recommendation, Onesta will provide access to the RIA's Form ADV 2A and the Onesta's solicitor's disclosure document. The solicitor disclosure document includes the name of the RIA; the nature of the relationship, including any affiliation, between Onesta and the RIA; a statement that Onesta will be compensated for the solicitation services; and the terms of Onesta solicitor's compensation arrangement, including a description of the compensation paid or to be paid to Onesta.

Users are encouraged to read all provided documents.

Prior to the user entering an agreement with the RIA, Onesta will provide the RIA with the user's signed and dated acknowledgment of receipt of the RIA Form ADV Part 2A and the Onesta's solicitor's disclosure document.

Past performance of any RIA is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each user should understand and be willing to bear. Users are reminded to discuss these risks with the selected RIA if an RIA is selected. Users should fully understand the risks of investing with any RIA.

## Item 9 Disciplinary Information

Onesta and its employees have not been involved in any legal or disciplinary events in the past.

## Item 10 Other Financial Industry Activities and Affiliations

Onesta and its employees do not have any relationships or arrangements with other financial services companies that pose conflicts of interest.

## Item 11 Code of Ethics, Participation or Interest in Client

Onesta has developed and enacted a code of ethics that includes policies and procedures that must be signed and followed by all owners and employees. The code of ethics ensures the following:

Onesta takes great care into making a full and fair disclosure of all material facts and avoiding the potential for users to be materially misled or misinformed about our business model and conflicts of interest. This is accomplished through policies adopted, implemented, and annually updated by our Chief Compliance Officer. The disclosure document and related information to be communicated to users is made available via an emphasized 'slideshow container' (similar to a pop-up box) shown prior to signup, the website's Frequently Asked Questions section, the website's footer, and upon user request. The disclosures adhere to the 'plain english' stipulations recommended by the SEC and are ensured to be available on both desktop and mobile versions of the website.

The disclosures themselves provide explanation of the business model, fee structure, information collection and usage policies, 3rd party affiliations, algorithm usage, algorithm functions, algorithm testing and post-implementation monitoring procedures, algorithm risks, assumptions and limitations of using an algorithm, algorithm override procedures, degree of human oversight, user information amending procedures, social media usage, protection of key advisory systems, and cybersecurity threat detection, prevention, and response.

In regards to the user data collection process, Onesta makes a reasonable inquiry into the user's financial situation and objectives via the website's questionnaire. Furthermore the interactive website processes

this user input in determination of the suitability of the rankings of the RIAs. To elicit sufficient information from the user and provide necessary clarification, Onesta uses 'plain english' in the wording of the questions, provides the opportunity to give additional information or context, collects and incorporates user feedback through the interactive website, provides design features which give additional information about the questions, and incorporates automatic system alerts if the user submits inconsistent information.

The Onesta's disclosure is careful not to overstate the extent of the services provided or the extent to which the user information is used.

A copy of Onesta's code of ethics is available on [www.onestafinance.com](http://www.onestafinance.com) or by email request to [info@onestafinance.com](mailto:info@onestafinance.com).

## Item 12 Brokerage Practices

Onesta does not select or recommend broker-dealers or custodians. The RIAs may recommend broker-dealers.

## Item 13 Review of Accounts

Onesta does not manage any assets.

## Item 14 Client Referrals and Other Compensation

Onesta is compensated by the RIAs as discussed in Item 5. Each RIA enters into Onesta's Terms and Conditions agreement outlining compensation to be paid to Onesta for the referrals to the RIAs.

## Item 15 Custody

Onesta does not maintain any user accounts.

## Item 16 Investment Discretion

Onesta does not maintain any user accounts

## Item 17 Voting Client Securities

Onesta does not maintain any user accounts



## Item 18 Financial Information

Onesta has never filed for bankruptcy and is not aware of any financial condition that is expected to affect its ability to meet its obligations. Onesta is not required to deliver a balance sheet as the advisor does not collect fees of \$1,200 or more for services to be performed six months or more in advance.