

Streetbeat LLC

228 Hamilton Ave 3rd Floor Palo Alto CA 94301
+1 (650) 487-0359

www.streetbeat.com

Form ADV Part 2A: Disclosure

Date: March 2023

This disclosure brochure provides information about the qualifications and business practices of Streetbeat LLC (“Streetbeat” or the “Adviser”). If you have any questions about the contents of this disclosure brochure, please contact us via email at info@streetbeat.com. The information in this disclosure brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Streetbeat is a registered investment adviser. The registration of an investment adviser does not imply any level of skill or training. The oral and written communications of an adviser provide you with information that you may use to determine whether to hire or retain such adviser.

Additional information about Streetbeat is also available on the U.S. Securities and Exchange Commission’s (“SEC”) website at www.adviserinfo.sec.gov.

Item 2 – Material Changes

This document is the Part 2A of Form ADV: Firm Brochure (the “Brochure”) for Streetbeat. This Item discloses material changes since the last annual update of this Brochure. Streetbeat has made the following material changes to the Brochure since its initial filing:

- **Item 4 – Description of Advisory Services** – This section was revised to reflect changes to the current Strategies offered by Streetbeat.
- **Item 5 – Fees and Compensation** – This section was revised to reflect changes to the Fee Schedule.
- **Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss** – This section was revised to incorporate certain investment related risks related to the current Strategies offered.

Pursuant to the SEC’s requirements and rules, you will receive a summary of any material changes to this Brochure within one hundred twenty days of the close of Streetbeat’s fiscal year. The Brochure may be requested at any time, without charge, by contacting Streetbeat at info@streetbeat.com or by visiting the website at www.streetbeat.com.

Item 3 – Table of Contents

Item 2 – Material Changes	2
Item 3 – Table of Contents	3
Item 4 – Advisory Business	4
Item 5 - Fees and Compensation	6
Item 6 - Performance-Based Fees and Side-by-Side Management	8
Item 7 – Types of Clients	8
Item 8 - Methods of Analysis, Investment Strategies and Risk of Loss	8
Item 9 – Disciplinary Information	15
Item 10 - Other Financial Industry Activities and Affiliations	16
Item 11 - Code of Ethics, Participation or Interest in Client Accounts and Personal Trading	16
Item 12 – Brokerage Practices	17
Item 13 - Review of Accounts	19
Item 14 - Client Referrals and Other Compensation	19
Item 15 – Custody	20
Item 16 – Investment Discretion	20
Item 17 - Voting Client Securities	21
Item 18 - Financial Information	21

Item 4 – Advisory Business

A. Description of the Advisory Firm

Streetbeat was founded on June 24, 2021. Additional information about Streetbeat is available on the SEC’s website at www.adviserinfo.sec.gov. You can search this site by using a unique identifying number, known as a CRD number. The CRD number for Streetbeat is #315893. The SEC’s website also provides information about any persons affiliated with Streetbeat who are registered, or are required to be registered, as investment adviser representatives of Streetbeat. Dianne Morin will serve as Streetbeat’s Chief Compliance Officer (“CCO”).

Streetbeat is a registered investment adviser (“RIA”) which offers non-discretionary online advisory services to its advisory clients (each a “Client,” and collectively, “Clients”) through an online web-based and mobile platform (the “Platform”).

Streetbeat is a privately held company headquartered in Palo Alto, California. Streetbeat is wholly owned by Nowcasting.ai, LLC. Information about Streetbeat’s organizational and ownership structure is provided on Part 1 of Streetbeat’s Form ADV which is available online at www.adviserinfo.sec.gov.

Streetbeat operates an investment Platform available at www.streetbeat.com (the “Website”) and as a mobile application (“App”). When a Client opens an account (“Investment Account”) with Streetbeat, they will be able to access the Investment Platform through either the App or the Website. The Platform provides Clients with investment advice in the form of certain recommended single stocks and exchange-traded funds presented to Clients as investment strategies (“Strategies” and each, a “Strategy”), specifically tailored and designed for each Client based on the Client’s investment profile. The investments offered through the Platform only include various publicly traded securities, such as exchange-traded funds (“ETFs”), and shares of stock of publicly traded companies (“Single Stocks” and together with ETFs, “Investments”). Each Strategy will be comprised of Single Stocks or ETFs. The Strategies are developed by Streetbeat’s proprietary algorithmic model (the “Model”) that aggregates and utilizes various data sets such as credit card data, GPS data, US contracts and more, and processes it with machine learning to provide indications in certain stock movement. This data is then combined with the Clients’ Suitability Questionnaire in order to provide recommended Strategies for Clients. Please see Section B – Description of the Advisory Services below for a more detailed look at the Strategies currently offered by Streetbeat, as well as the data and information incorporated into each Strategy.

From time to time, the Strategies offered by Streetbeat may change. Streetbeat will communicate any changes to you by updating this Brochure.

A Client may invest at their discretion in any one of the Single Stocks or ETFs, or invest in the Strategy as a whole. When a Client invests in a Strategy as a whole, the Client will allocate a set amount of funds towards their investment in the Strategy, and Streetbeat will obtain limited discretionary authority to determine how to allocate the Client’s funds towards each of the Investments in the Strategy. The Platform also provides content regarding finance and markets. Advisory services are delivered solely through the Website and App. Streetbeat does not provide investment advice in person or over the phone or in any manner other than through the Website and App. Additional information about Streetbeat’s products and services is provided in Streetbeat’s Form ADV Part 1 available at <http://www.adviserinfo.sec.gov>. Streetbeat encourages visiting the Website or the App for additional information.

B. Description of the Advisory Services

Streetbeat provides non-discretionary investment advisory services (“Advisory Services”) to Clients solely through the Platform. The Platform recommends one or more Strategies to each Client based on the Model and on the information provided in the Suitability Questionnaire (“Suitability Questionnaire”) completed by such Client. The Strategies are solely made up of Investments. All of the Investments will be presented as part of a Strategy that the Client may choose to invest in, or choose to invest in the Investments individually.

When a Client chooses Streetbeat’s Advisory Services, the Client will be provided with certain recommended Strategies. The Platform will provide new Strategies for Clients to choose to purchase on an ongoing basis. New Strategies may be provided daily, weekly, or monthly, depending on the specific Strategy. At their sole discretion, Clients may choose to purchase one of the recommended Strategies or one of the Investments that make up the Strategy. The Platform currently relies on questions relating to suitability (i.e., age, income and liquid net worth, investment objectives, investment time horizon, and risk tolerance) in recommending Strategies, and these questions are not weighted equally. Clients should understand the recommendation of Strategies relies upon the information provided by each such Client, and Streetbeat does not capture any additional information not covered in the Suitability Questionnaire in providing recommended Strategies to Clients. Clients are advised to promptly update their financial information on the Suitability Questionnaire if there are any changes to their financial situation or financial goals, as the Strategies recommended to each Client are reliant upon each Client’s Suitability Questionnaire.

When a Client chooses to purchase a Strategy, the Client will allocate a specific amount of funds towards the purchase of the Strategy. The decision to purchase a Strategy and allocate funds towards to the purchase is solely at the Client’s discretion. Once a Client has decided to allocate funds towards and purchase a Strategy, Streetbeat will then obtain limited discretionary authority to allocate the Client’s funds to the specific Investments that make up the Strategy based on the Client’s risk tolerance, investment goals and other information provided by the Client in the Suitability Questionnaire. Additionally, Streetbeat will have limited discretionary authority to rebalance the allocation from time to time and based on the Client’s provided responses to the Suitability Questionnaire. In order to sell their position in a Strategy, Clients can reduce their allocated investment position to zero during market hours. When a Client reduces their investment position to zero, Streetbeat will obtain limited discretionary authority to sell and close out of the Client’s position in the Strategy during the next trading day at a time that the Model determines is optimal.

Current Available Strategies:

Earnings Calls Strategy

The Earnings Call Stocks Strategy is made up of several Single Stocks that the Model automatically buys and sells using a combination of multiple signals derived from various sources, including earnings per share, revenue estimates, fundamentals, and historical quotes. This intelligent trading is done when Model’s algorithms evaluate the universe of stocks on a daily basis, and invests in stocks of companies that have a market cap above \$200 million, have an average daily trading volume of at least one million in the last thirty days, and has a price above \$4 USD. The minimum investment amount is \$50.

Bond Ladder Strategy

The Bond Ladder Strategy seeks to provide stable growth while lessening sensitivity to interest rate fluctuations. This Strategy is comprised of several ETFs selected by the Model in accordance with the Strategy’s focus. Specifically, the Strategy seeks to invest in high-yield bond funds with short-term

maturity dates staggered in the future. The minimum investment amount is \$100.

Top Government Contract Recipients Strategy

The Strategy is made up of several Single Stocks that the Model automatically buys and sells using signals derived from federal spending information. The Strategy selects the top twenty companies that received government contracts, weighted by the values of each individual announced contract. Each company's government contracts are measured with an exponential moving average to favor more recent contracts while still weighing historical contracts. This portfolio is rebalanced daily provided that the stock market is open for trading. The minimum investment amount is \$500. This Strategy is suitable for investors with a moderate to aggressive risk tolerance.

U.S. Congress Buys Strategy

The U.S. Congress Buys and U.S. House Buys Strategy is comprised of Single Stocks of companies that members of the United States Congress and United States House of Representatives and/or their spouses have reported through public disclosure filings made pursuant to the Stop Trading on Congressional Knowledge Act ("STOCK Act"). STOCK Act filings, known as Periodic Transaction Reports ("PTRs") are filed with either the Senate Office of Public Records or the Clerk of the House of Representatives and made available online pursuant to the Ethics in Government Act ("EIGA"), as amended. PTRs include both buy and sell transactions, as well as other asset transfers. The transaction data included in the PTRs is received daily at midnight, and the Strategy is rebalanced daily provided that the stock market is open for trading. The number of positions in the portfolio will vary based on those held by those held by Congressional and House members. Furthermore, the Strategy will weigh the portfolio based on the disclosures made in the PTRs. The minimum investment amount is \$500. This Strategy is suitable for investors with a moderate to aggressive risk tolerance.

U.S. House Buys Strategy

U.S. House Buys Strategy is comprised of Single Stocks of companies that members of the United States House of Representatives and/or their spouses have reported through public disclosure filings made pursuant to the Stop Trading on Congressional Knowledge Act ("STOCK Act"). STOCK Act filings, known as Periodic Transaction Reports ("PTRs") are filed with the Clerk of the House of Representatives and made available online pursuant to the Ethics in Government Act ("EIGA"), as amended. PTRs include both buy and sell transactions, as well as other asset transfers. The transaction data included in the PTRs is received daily at midnight, and the Strategy is rebalanced daily provided that the stock market is open for trading. The number of positions in the portfolio will vary based on those held by those held by House members. Furthermore, the Strategy will weigh the portfolio based on the disclosures made in the PTRs. The minimum investment amount is \$500. This Strategy is suitable for investors with a moderate to aggressive risk tolerance.

Investment Strategy Generation:

Streetbeat provides Clients with the ability to generate their own personalized Strategies based on their unique preferences and risk profiles ("Strategy Generation"). The Strategy Generation feature leverages artificial intelligence ("AI") tools and real-time market data, together with a Client's inputs and previous responses to the Suitability Questionnaire, to generate unique and tailored ETF portfolios. To utilize this Strategy Generation feature, Clients will input unique prompts (either via text or audio) requesting an investment strategy, market sector, or otherwise. The Strategy Generation feature will

process the Client's prompt and leverage AI tools and market-data to generate appropriate Strategies for the Client to invest in at the Client's discretion.

In generating the responsive Strategies, the Strategy Generation feature will consider the Client's Suitability Questionnaire and confine any responsive Strategy within the bounds of the Client's investment profile and preferences such as their risk profile, declared income, place of residence for legal and tax matters, current market conditions, and other relevant factors. The Strategy Generation feature will then curate a list of potential responses and perform a consistency check before selecting up to 10 responses to present to the Client. Each generated Strategy will also contain a description generated for each strategy. Streetbeat will obtain limited discretionary authority to rebalance the generated Strategies on a weekly basis.

Upon receiving the generated Strategies, Clients are able to select, modify, or request additional Strategies. Streetbeat will provide various financial and performance information relating to each generated Strategy. Clients may save generated Strategies for future investment purposes which the Client can access at any time.

General Use:

Interested parties may access the Platform at any time. This Brochure, which is available on the Platform and on Streetbeat's website, describes, among other things, Streetbeat, its services, potential fees and any material conflicts of interest that could be reasonably expected to impair the rendering of unbiased and objective advice. Streetbeat's privacy policy is also provided for reference on the Platform. Both the Brochure and the privacy policy are available to interested parties for their download and/or printing.

Clients may access the App or the Website in order to purchase or sell Strategies or Investments. When a Client accesses their Investment Account, they will be provided with a list of Strategies that the Model generates and determines are appropriate for a specific Client based on the information provided in the Suitability Questionnaire. Clients have the option to purchase any of the Strategies or Investments provided to them.

The investments in each Client's Investment Account are held in a separate account in the name of the Client at an independent custodian, and not with Streetbeat. All Investment Accounts managed through the Platform are required to use the custodian selected by Streetbeat, Alpaca Securities, LLC (the "Custodian" or "Alpaca"), as the independent custodian. Each account agreement with the Custodian will grant Streetbeat the authority to manage each Client's Investment Account on a non-discretionary basis, seeking a Client's authorization for each trade, provided that Streetbeat be given the limited discretionary authority to allocate Client funds to Investments in Strategies, to Auto-Close positions when optimal, and to rebalance, buy and/or sell certain Investments depending on the Strategy a Client has chosen to allocate funds towards.

C. Assets Under Management

As of December 31, 2022, Streetbeat managed \$5,964,907.39 in client assets ("AUM") on a non-discretionary basis. This total AUM is calculated using the closing U.S. market prices from December 31, 2022. AUM naturally fluctuates over time and disclosed AUM may be higher or lower at present date than as of the AUM calculation date. Clients may request more current information at any time by contacting Streetbeat.

Item 5 - Fees and Compensation

A. Fees for Advisory Services

We charge both a monthly management fee (“Management Fee”) for Advisory Services based on the amount of assets under management (“AUM”), as well as a monthly subscription fee (“Subscription Fee” and together with the Management Fee, the “Fee”) chosen by the Client. We currently offer Advisory Services at three different subscription levels. Each level has a different Subscription Fee as well as a Management Fee. Our Fees are currently as follows:

Subscription Level	Monthly Subscription	Management Fee
Basic	\$2.99	0.1%
Premium	\$9.99	0.1%
Gold	\$99.99	0.1%

Streetbeat deducts the Fee from the linked funding source (“Linked Funding Source”) in a Client’s Account(s). If the payment is failed, Streetbeat will deduct the Fee from the Account held with the Custodian. Upon engaging Streetbeat to manage such Account(s), a Client grants Streetbeat this limited authority to deduct the Fee through a written instruction to the Custodian of his/her Account(s).

Clients authorize and direct Streetbeat to instruct the Custodian to deduct the Fee directly from the Client’s custodial account at Alpaca, or charge the Linked Funding Source and pay the Fee to Streetbeat. In situations where there is no Linked Funding Source or there is not enough cash in the Client’s Account with the Custodian, the Client will also authorize Streetbeat to deduct the Fee from a Client’s Account by instructing Alpaca to deduct such Fee from the assets in the Client’s Account, including by selling (liquidating) a sufficient amount of holdings to cover the Fee.

B. Fees Charged by Financial Institutions

In connection with the Streetbeat’s management of client assets, and any purchase or sales by a Client, Clients may incur fees and/or expenses separate from the Streetbeat’s services. These additional fees and charges may include transaction and execution charges and the fees/expenses charged by any custodian, and other transaction-related costs, electronic fund and wire fees, and any other fees that reasonably may be borne by a brokerage account. The issuer of some of the securities or products purchased for Clients, such as ETFs or other similar financial products, may charge product fees that affect Clients. These fees and/or expenses are separate from and in addition to the Streetbeat’s annual advisory fee, if any. The Client is responsible for all such fees and expenses. These fees are charged by and paid to the broker-dealer or custodian from the Clients’ accounts. Streetbeat does not receive, directly or indirectly, any portion of these fees charged to the Client. In addition, none of the Streetbeat’s employees receive (directly or indirectly) any compensation from the purchase or sale of securities or investments for Clients.

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

Performance based fees are fees based on a share of capital gains on or capital appreciation of the assets of a Client. Streetbeat does not charge any performance-based fees.

Item 7 – Types of Clients

Streetbeat's customers are individual investors and business entities.

Streetbeat does not currently require a minimum amount in order to open an account, but we do have minimum investment amounts for our Strategies. Streetbeat reserves the right to impose a minimum or maximum account size or value in the future at its discretion. If and when Streetbeat chooses to impose a minimum or maximum account size, Streetbeat will provide written notice to all Clients by amending this Brochure.

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

Streetbeat utilizes a risk-based scoring mechanism for suitability determination based on the answers provided in the Suitability Questionnaire. The Suitability Questionnaire will include age, financial need, annual income and net worth, investment objectives, investment time horizon and risk tolerance. Upon completion of the Suitability Questionnaire, the Client is presented with a variety of Strategies, created by Streetbeat's Model, which are based on the risk-based score assigned to the Client and which the Client may select for purchase.

A. Investment Strategies

Proprietary Strategies:

Streetbeat uses a proprietary Model to help select the Strategies it recommends and/or makes available through the Platform to each Client. Currently available Strategies are listed above in Item 4. The proprietary Model analyzes the Client-supplied data through the Suitability Questionnaire and recommends one or more Strategies. Streetbeat's Platform will recommend a variety of Strategies organized by specified metrics, including performance, risk and/or popularity. The Platform is designed to promote diversification and return within the Client-specific risk and suitability limits. The Model generates new Strategies and updates the Strategies recommended to Clients on a daily basis.

Streetbeat utilizes unique datasets that until now have been exclusively used by hedge funds for investing. The key datasets include, but are not limited to, credit card transactions (exclusive retail investor access), Mobile GPS, consensus, and social sentiment. Based on this data, the Model is trained to provide for both long positions and for short positions, in order to give a complete twenty-four hour indication of stock movement. For example, credit card data providing an indication that a company gained more users than expected would generate a positive signal for the Model. The Model will compare these signals with its historic training and current market and sector conditions, as well as various other data sets like earning calls analysis and company behavior around public data release, to produce a confidence indicator of the direction of the company. Finally, using a Client's Suitability Questionnaire, as well as market condition, the system will present the Strategy to, or exclude it from, the particular Client.

AI Strategies:

Streetbeat offers the Strategy Generation feature which utilizes AI to assist in generating Strategies for Clients. The AI model will source real-time market data and generate Strategies based on Client inputs and suggestions into the AI System. As such, generated Strategies are comprised in large part on the Client's inputs. In generating the responsive Strategies, the Strategy Generation feature will consider the Client's Suitability Questionnaire and confine any responsive Strategy within the bounds of the Client's investment profile and preferences such as their risk profile, declared income, place of residence for legal and tax matters, current market conditions, and other relevant factors.

B. Risk of Loss

Streetbeat does not guarantee the future performance of any Investment Account. Clients must understand that investments made via the Platform involve substantial risk and are subject to various market, currency, economic, political and business risks, and that those investment decisions and actions will not always be profitable. Clients may not get back the amount invested. Subject to the Advisers Act, Streetbeat shall have no liability for any losses in a Client's account. The price of any security or the value of an entire asset class can decline for a variety of reasons outside of Streetbeat's control, including, but not limited to, changes in the macroeconomic environment, unpredictable market sentiment, forecasted or unforeseen economic developments, interest rates, regulatory changes, and domestic or foreign political, demographic, or social events. There is no guarantee that Streetbeat's judgment or investment decisions about particular securities or asset classes will necessarily produce the intended results. Streetbeat's judgment may prove to be incorrect, and a Client might not achieve his or her investment objectives. High volatility and/or the lack of deep and active liquid markets for a security may prevent a Client from selling his or her securities at all, or at an advantageous time or price because Streetbeat and the Client's broker may have difficulty finding a buyer and may be forced to sell at a significant discount to market value. The Platform, by its automated nature, limits excessive trading risk, although human programming error may result in excessive trading. Streetbeat cannot guarantee any level of performance or that any Client will avoid a loss of Investment Account assets. ***Any investment in securities involves the possibility of financial loss that Clients should be prepared to bear.***

When evaluating risk, financial loss may be viewed differently by each Client and may depend on many different risk items, each of which may affect the probability of adverse consequences and the magnitude of any potential losses. The following risks may not be all-inclusive but should be considered carefully by a prospective Client before entering the Platform. These risks should be considered as possibilities, with additional regard to their actual probability of occurring and the effect on a Client if there is, in fact, an occurrence. ***Past performance of a security is not necessarily indicative of future performance or risk of loss.***

Risks of Investing:

Market Risk - The price of any security or the value of an entire asset class can decline for a variety of reasons outside of Streetbeat's control, including, but not limited to, changes in the macroeconomic environment, unpredictable market sentiment, forecasted or unforeseen economic developments, interest rates, regulatory changes, and domestic or foreign political, demographic, or social events.

Investment Risk - There is no guarantee that Streetbeat's judgment, Model or investment decisions about particular securities or asset classes will necessarily produce the intended results. Streetbeat's judgment may prove to be incorrect, and a Client might not achieve his or her investment objectives. Streetbeat may also make future changes to the investing algorithms and services that it provides. In addition, it is possible that Clients or Streetbeat itself may experience computer equipment failure, loss of internet access, viruses, or other events that may impair access to Streetbeat's software-based financial service.

Volatility and Correlation Risk - Clients should be aware that Streetbeat's asset selection process is based in part on a careful evaluation of past price performance and volatility in order to evaluate future probabilities. However, it is possible that different or unrelated asset classes may exhibit similar price changes in similar directions, which may adversely affect a Client, and may become more acute in times of market upheaval or high volatility. Past performance is no guarantee of future results, and any historical returns, expected returns, or probability projections might not reflect actual future performance.

Liquidity and Valuation Risk - High volatility and/or the lack of deep and active liquid markets for a security may prevent a Client from selling her securities at all, or at an advantageous time or price because Streetbeat and the Client's broker may have difficulty finding a buyer and may be forced to sell at a significant discount to market value. Some ETFs that hold or trade financial instruments may be adversely affected by liquidity issues as they manage their portfolios.

Credit Risk - Streetbeat cannot control, and Clients are exposed to the risk that financial intermediaries or security issuers may experience adverse economic consequences that may include impaired credit ratings, default, bankruptcy or insolvency, any of which may affect portfolio values or management. This risk applies to assets on deposit with any broker utilized by a Client, notwithstanding asset segregation and insurance requirements that are beneficial to Clients generally. In addition, exchange trading venues or trade settlement and clearing intermediaries could experience adverse events that may temporarily or permanently limit trading or adversely affect the value of securities held by Clients. Finally, any issuer of securities may experience a credit event that could impair or erase the value of the issuer's securities held by a Client. Streetbeat seeks to limit credit risk through ETFs, which are subject to regulatory limits on asset segregation and leverage such that fund shareholders are given liquidation priority versus the fund issuer; however, certain funds and products may involve higher issuer credit risk because they are not structured as a registered fund.

Legislative and Tax Risk - Performance may directly or indirectly be affected by government legislation or regulation, which may include, but is not limited to: changes in investment adviser or securities trading regulation; change in the U.S. government's guarantee of ultimate payment of principal and interest on certain government securities and changes in the tax code that could affect interest income, income characterization, and/or tax reporting obligations (particularly for ETFs dealing in natural resources). Streetbeat does not engage in financial or tax planning, and in certain circumstances, a Client may incur taxable income on her investments without a cash distribution to pay the tax due.

Foreign Investing and Emerging Markets Risk - Foreign investing involves risks not typically associated with U.S. investments, and the risks may be exacerbated further in emerging market countries. These risks may include, among others, adverse fluctuations in foreign currency values, as well as adverse political,

social and economic developments affecting one or more foreign countries. In addition, foreign investing may involve less publicly available information and more volatile or less liquid securities markets, particularly in markets that trade a small number of securities, have unstable governments, or involve limited industry. Investments in foreign countries could be affected by factors not present in the U.S., such as restrictions on receiving the investment proceeds from a foreign country, foreign tax laws or tax withholding requirements, trade clearance or settlement procedures, and potential difficulties in enforcing contractual obligations or other legal rules that jeopardize shareholder protection. Foreign accounting may be less transparent than U.S. accounting practices, and foreign regulation may be inadequate or irregular.

Frontier Markets Risks - The risks associated with investing in foreign or emerging markets generally are magnified in frontier markets, also known as “next emerging” markets. Some frontier markets may operate in politically unstable regions of the world and may be subject to additional geopolitical/disruption-of-markets risks.

ETF Risks, including Net Asset Valuations and Tracking Error - ETF performance may not exactly match the performance of the index or market benchmark that the ETF is designed to track because 1) the ETF will incur expenses and transaction costs not incurred by any applicable index or market benchmark; 2) certain securities comprising the index or market benchmark tracked by the ETF may, from time to time, temporarily be unavailable; and 3) supply and demand in the market for either the ETF and/or for the securities held by the ETF may cause the ETF shares to trade at a premium or discount to the actual net asset value of the securities owned by the ETF. Certain ETF strategies may from time to time include the purchase of fixed income, commodities, foreign securities, American Depositary Receipts, or other securities for which expenses and commission rates could be higher than normally charged for exchange-traded equity securities, and for which market quotations or valuation may be limited or inaccurate.

Clients should be aware that to the extent they invest in ETF securities, they will pay two levels of compensation – fees charged by Streetbeat, which are currently zero, plus any management fees charged by the issuer of the ETF. This scenario may cause a higher cost (and potentially lower investment returns) than if a Client purchased the ETF directly.

An ETF typically includes embedded expenses that may reduce the fund’s net asset value, and therefore directly affect the fund’s performance and indirectly affect a Client’s portfolio performance or an index benchmark comparison. Expenses of the fund may include investment adviser management fees, custodian fees, brokerage commissions, and legal and accounting fees. ETF expenses may change from time to time at the sole discretion of the ETF issuer. ETF tracking error and expenses may vary.

Certain ETFs are more risky than others. Leveraged ETFs seek to deliver multiples of the performance of the index or benchmark they track. However, inverse and leveraged ETFs are illiquid, speculative, and aggressive investments that are not designed for a long-term “buy and hold strategy.” Most Inverse or Leveraged ETFs get their leverage by using derivatives. The prices of derivative contracts do not necessarily move in tandem with the underlying securities. As a result, Inverse or Leveraged ETFs can have volatile price movements and race ahead or fall behind their stated index over long and short periods. Costs of borrowing to implement leverage as well as any efforts to insure counterparty risk are borne by the fund, creating a potential drag on returns. Leveraged and inverse ETFs may also have higher fees, which can affect returns.

Inflation, Currency, and Interest Rate Risks - Security prices and portfolio returns will likely vary in response to changes in inflation and interest rates. Inflation causes the value of future dollars to be worth less and may reduce the purchasing power of an investor’s future interest payments and principal. Inflation also generally leads to higher interest rates, which in turn may cause the value of many types of fixed-income investments to decline. The liquidity and trading value of foreign currencies could be affected by global economic factors, such as inflation, interest rate levels, and trade balances among countries, as well as the actions of sovereign governments and central banks. In addition, the relative value of the U.S. dollar-denominated assets primarily managed by Streetbeat may be affected by the risk that currency devaluations affect Client purchasing power.

Technology Risks - The techniques and methodologies utilized by Streetbeat in offering investment advice are fundamentally dependent on technology, including hardware, software and telecommunications

systems. The data gathering, research, forecasting, Strategy generation, order execution, trade allocation, risk management, operational, back office and accounting systems, among others, utilized by Streetbeat are all highly automated and/or computerized. Such automation and computerization are dependent upon an extensive amount of proprietary software and third-party hardware and software. Streetbeat typically does not utilize design documents or specifications when building its proprietary software. The proprietary software code thus typically serves as the only definitive documentation and specification for how such software should perform.

Streetbeat's proprietary software and third-party hardware and software may experience errors, omissions, imperfections and malfunctions (collectively, "Coding Errors"). Coding Errors in third-party hardware and software are generally entirely outside of the control of Streetbeat.

Streetbeat, however, seeks to reduce the incidence and impact of Coding Errors through a certain degree of internal testing and real-time monitoring, and the use of independent safeguards in the overall Platform and often, with respect to proprietary software, in the software code and the Model itself. Despite such testing, monitoring and independent safeguards, Coding Errors may result in, among other things, the generation of unanticipated Strategies, the failure to execute trades in a timely fashion, and/or the failure to properly gather and organize available data, all of which can and may have adverse (and potentially materially adverse) effects on Streetbeat Investment Accounts and/or the Client's performance.

Coding Errors are often extremely difficult to detect, especially in the case of proprietary Model. Regardless of how difficult their detection appears in retrospect, some of these Coding Errors may go undetected for long periods of time and some may never be detected. The degradation or impact caused by these Coding Errors can compound over time. Moreover, Streetbeat may detect certain Coding Errors that it chooses, in its sole discretion, not to address or fix. While Streetbeat may not perform a materiality analysis on many of the Coding Errors discovered in its software code, Streetbeat believes that the testing and monitoring performed on such software will enable Streetbeat to identify and address those Coding Errors that a prudent person managing a digital investment program would identify and address by correcting the Coding Errors. Clients should assume that Coding Errors and their ensuing risks and impact are an inherent part of investing with a digital investment adviser such as Streetbeat. Accordingly, Streetbeat does not expect to disclose discovered Coding Errors to the Clients. Streetbeat seeks, on an ongoing basis, to create adequate backups of software and hardware where possible but there is no guarantee that such efforts will be successful.

Further, to the extent that an unforeseeable software or hardware malfunction or problem is caused by a defect, security breach, virus or other outside force, Clients may be materially adversely affected.

Risks of Relying on Data - The Strategies recommended to Clients are highly reliant on the gathering, cleaning, culling and analysis of large amounts of data from third-party and other external sources. It is not possible or practicable, however, to factor all relevant, available data into generating Strategies. It is also not possible, in some cases, to gather real time data, and there is a risk of a reporting delay in gathering certain data. Streetbeat will use its discretion to determine what data to gather with respect to any recommended Strategy and what subset of that data the Platform takes into account to generate Strategies. The data used in the Program is obtained or derived from sources believed to be reliable, but Streetbeat does not verify such data and cannot guarantee its accuracy and completeness. In addition, due to the automated nature of such data gathering and the fact that much of this data comes from third-party sources, it is inevitable that not all desired and/or relevant data will be available to, or processed by, Streetbeat at all times. In such cases, Streetbeat often will continue to generate Strategies based on the data available to it. Additionally, Streetbeat may determine that certain available data, while potentially useful in generating Strategies, is not cost effective to gather due to either the technology costs or third-party vendor costs and, in such cases, Streetbeat will not utilize such data. Clients should be aware that, for all of the foregoing reasons and more, there is no guarantee that any specific data or type of data will be utilized in generating

Strategies, nor is there any guarantee that the data actually utilized in generating Strategies will be (i) the most accurate data available or (ii) free of errors. Clients should assume that the foregoing limitations and risks associated with gathering, cleaning, culling and analyzing large amounts of data from third-party and other external sources are an inherent part of investing with a digital investment adviser.

The Platform also relies on information provided by Clients in generating Strategies. The Strategies are highly reliant on the accuracy of the information provided to Streetbeat by Clients. If a Client were to provide Streetbeat with inaccurate information, this could materially impact the quality and applicability of the Strategies. In addition, the Strategies are limited in scope to the questions Streetbeat asks through the Suitability Questionnaire.

Artificial Intelligence (AI) Risks – The Strategy Generation feature offered by Streetbeat is highly reliant on AI such as ChatGPT to process client prompts and ultimately generate investments and Strategies based off of the Client's prompt. However, AI is a relatively new technology and as a result, there are inherent risks in relying on new technologies such as software malfunctions or Coding Errors. The Strategy Generation feature does not rely on the proprietary Model, but Streetbeat will implement Client profiles into generated Strategies so that any generated Strategy is consistent with the Client's investment preferences. However, there is no guarantee that the AI generated Strategies will be consistent with the Strategies provided by the Model and available for selection on the Platform. Further, Streetbeat's Strategy Generation feature and AI interface is completely reliant on third party providers maintaining and operating the AI system. These AI systems may become disabled or fail to operate properly as a result of events or circumstances wholly or partly beyond our or the third-party provider's control. Streetbeat maintains no control over AI models that it implements on the Platform, and can only control the AI outputs and generated Strategies that are shown to Clients and presented for investment. The Strategy Generation feature is also dependent on the Client's inputs. The AI will interpret and base its outputs in large part on the text or audio that a Client submits. Clients should be aware that the generated Strategies they receive are based primarily on the text inputs or recommendations and suggestions that they input into the AI system. Additionally, given that AI is a new technology and its implementation into investing advice is even more recent, new versions or updates of AI models are continuously being released. Streetbeat will attempt to implement the newest model of AI into the Platform, however, there is no guarantee that any new model will operate or interface with Streetbeat's Platform in a manner identical to previously used AI models. And, there is no guarantee that results will be similar between different versions of AI models. As such, Clients should generally be aware and understand the unpredictability of AI and the risks of relying on AI as an investment tool.

Cybersecurity Risks – Streetbeat and its service providers are subject to risks associated with a breach in cybersecurity. Cybersecurity is a generic term used to describe the technology, processes and practices designed to protect networks, systems, computers, programs and data from cyber-attacks and hacking by other computer users, and to avoid the resulting damage and disruption of hardware and software systems, loss or corruption of data, and/or misappropriation of confidential information. In general, cyber-attacks are deliberate, but unintentional events may have similar effects. Cyber-attacks may cause losses to Clients by interfering with the processing of transactions, affecting Streetbeat's ability to create and update Strategies or impeding or sabotaging trading. Clients may also incur substantial costs as the result of a cybersecurity breach, including those associated with forensic analysis of the origin and scope of the breach, increased and upgraded cybersecurity, identity theft, unauthorized use of proprietary information, litigation, and the dissemination of confidential and proprietary information. Any such breach could expose Streetbeat to civil liability as well as regulatory inquiry and/or action. In addition, Clients could incur additional losses as a result of unauthorized use of their personal information. While we have established business continuity plans, incident response plans and systems designed to prevent cyber-attacks, there are inherent limitations in such plans and systems, including the possibility that certain risks have not been identified. Similar types

of cybersecurity risks also are present for issuers of securities in which we invest, which could result in material adverse consequences for such issuers, and may cause a Client's investment in such securities to lose value.

Investment Strategy Risks - There are risks associated with the long-term core strategic holdings. The more aggressive the investment strategy, the more likely the portfolio will contain larger weights in riskier asset classes, such as equities.

Equity-Related Risks - The prices of equity securities will rise and fall. These price movements may result from factors affecting individual companies, industries, or the securities market as a whole. Individual companies may report poor results or be negatively affected by industry and/or economic trends and developments. The prices of securities issued by such companies may suffer a decline in response. In addition, the equity market tends to move in cycles, which may cause stock prices to fall over short or extended periods of time.

Fixed Income Risks - Bond markets rise and fall daily, and fixed income investments, which generally also include instruments with variable or floating rates, are subject to various risks. When interest rates rise, bond prices usually, but don't always, fall. The longer the duration of a bond, the more sensitive to interest rate movements its value is likely to be. A decline in the credit quality of a fixed income investment could cause the value of fixed income product to fall. High-yield securities and unrated securities of similar credit quality (sometimes called junk bonds) are subject to greater levels of credit and liquidity risks. High-yield securities may be considered speculative. Fixed income securities are subject to the risk of the issuer's or a guarantor's inability to meet principal and interest payments on its obligations, price volatility, interest rate risks, credit risks, and market risks. These risks could reduce the yield that an investor receives from his or her portfolio. These risks can occur from fluctuations in interest rates, a change to an issuer's individual condition or industry, or events in financial markets.

Reliance on Management and Other Third Parties - ETF investments will rely on third-party management and advisers, Streetbeat is not expected to have an active role in the day-to-day management of investments. Carried interest and other incentive distributions to fund management may create an incentive towards more speculative investments than would otherwise have been made.

Infrastructure Risks - Infrastructure-related investments are subject to a number of unique risks. These investments may be concentrated into a small number of projects, resulting in a high degree of risk with respect to each project. Further, these investments are often subject to foreign and emerging market risks.

Market Volatility - General fluctuations in the economy may affect the value of one or more investments. In the event of economic volatility, the ability to achieve a favorable return on investments may be severely impeded.

Socially Responsible Investing - Investments may focus on "low carbon" or other areas of socially responsible investing. This investment category represents a relatively new area of investment with a relatively limited performance track-record. Due to the consideration of non-monetary factors in investment decisions, these investments may experience a lower rate of return. There may be a relatively limited number of investments to consider in this investment category, and available investments may be subject to increased competition.

Large Investment Risks - Clients may collectively account for a large portion of the assets in certain investments. A decision by many investors to buy or sell some or all of a particular investment where Clients hold a significant portion of that investment may negatively impact the value of the investment.

Use of Margin and Leverage - While the use of margin borrowing can substantially improve returns, such use may also increase the adverse impact to which a Client's portfolio may be subject. Borrowings will usually be from securities brokers and dealers and will typically be secured by the Client's securities and/or other assets. Under certain circumstances, such a broker-dealer may demand an increase in the collateral that secures the Client's obligations and if the client were unable to provide additional collateral, the broker-dealer could liquidate assets held in the account to satisfy the Client's obligations to the broker-dealer. You are not required to be notified before your securities are liquidated. Liquidation in that manner could have extremely adverse consequences. In addition, the amount of the client's borrowings and the interest rates on those borrowings, which will fluctuate, will have a significant effect on the Client's profitability.

When using margin, you can lose more funds than you deposit into your account. A decline in the value of securities that are purchased on margin may require you to provide additional funds to the firm that has made the loan to avoid the forced sale of those securities or other securities in your account.

Novel Coronavirus Pandemic, Public Health Emergency and Global Economic Impacts - As of the date of this Form ADV Part 2A, there is an ongoing outbreak of a novel and highly contagious form of coronavirus ("COVID-19"), which the World Health Organization declared a pandemic on March 11, 2020. The outbreak of COVID-19 has caused a worldwide public health emergency with a substantial number of hospitalizations and deaths, and has significantly adversely impacted global commercial activity and contributed to both volatility and material declines in equity and debt markets. The global impact of the outbreak is rapidly evolving, and many country, state and local governments have reacted by instituting mandatory or voluntary quarantines, travel prohibitions and restrictions, closure or reduction of offices, businesses, schools, retail stores and other public venues and/or cancellation, suspension or postponement of certain events and activities, including certain non-essential government and regulatory activity. Businesses are also implementing their own precautionary measures, such as voluntary closures, temporary or permanent reductions in workforce, remote working arrangements and emergency contingency plans. Such measures, as well as the general uncertainty surrounding the dangers, duration and impact of COVID-19, are creating significant disruption in supply chains and economic activity, impacting consumer confidence and contributing to significant market losses, including having particularly adverse impacts on transportation, hospitality, tourism, sports, entertainment and other industries dependent upon physical presence. As COVID-19 continues to spread, potential additional adverse impacts, including a global, regional or other economic recession of indeterminate duration, are increasingly likely and difficult to assess.

The extent of the impact of COVID-19 on Streetbeat will depend on many factors, including the duration and scope of the resulting public health emergency, the extent of any related restrictions implemented, the impact of such public health emergency on overall supply and demand, goods and services, investor liquidity, consumer confidence and levels of economic activity, and the extent of its disruption to important global, regional and local supply chains and economic markets, all of which are highly uncertain and cannot be predicted. The effects of the COVID-19 pandemic may materially and adversely impact Streetbeat's ability to source, manage and divest investments and Streetbeat's ability to achieve its investment objectives on behalf of its Clients, all of which could result in significant losses to a Client.

In addition, COVID-19 and the resulting changes to global businesses and economies will, likely, adversely impact the business and operations of Streetbeat, and its respective affiliates. Certain businesses and activities may be temporarily or permanently halted as a result of government or other quarantine measures, voluntary and precautionary restrictions on travel or meetings and other factors, including the potential adverse impact of COVID-19 on the health of key personnel.

Other Catastrophic Risks - In addition to the potential risks associated with COVID-19 as outlined above, Streetbeat may be subject to the risk of loss arising from direct or indirect exposure to a number of types of

other catastrophic events, including without limitation (i) other public health crises, including any outbreak of SARS, H1N1/09 influenza, avian influenza, other coronavirus, Ebola or other existing or new epidemic diseases, or the threat thereof; or (ii) other major events or disruptions, such as hurricanes, earthquakes, tornadoes, fires, flooding and other natural disasters; acts of war or terrorism, including cyberterrorism; or major or prolonged power outages or network interruptions. The extent of the impact of any such catastrophe or other emergency on Streetbeat's operational and financial performance will depend on many factors, including the duration and scope of such emergency, the extent of any related travel advisories and restrictions, the impact on overall supply and demand, goods and services, investor liquidity, consumer confidence and levels of economic activity, and the extent of its disruption to important global, regional and local supply chains and economic markets, all of which are highly uncertain and cannot be predicted. In particular, to the extent that any such event occurs and has a material effect on global financial markets or specific markets in which Streetbeat participates (or has a material effect on any locations in which Streetbeat operates or on any of their respective personnel) the risks of loss could be substantial and could have a material adverse effect the ability of Streetbeat to fulfill its investment objectives.

Government Regulation Risk – Specific to the U.S. Congress Buys and U.S. House Buys Strategy, certain legislation or regulations could be enacted that limits, restricts, or prevents United States Congresspeople and/or their spouses from personal securities trading. Legal, tax, and regulatory changes could occur that may adversely affect the U.S. Congress Buys and U.S. House Buys Strategy's ability to pursue its objectives and/or increase the costs of implementing such strategy. Government regulation may change frequently and may have significant adverse consequences for the Strategy. It is not possible to fully predict the effects of current or future legislation or regulation.

Reporting Delay Risk - Members of Congress are required to report certain securities transactions (purchases, sales or exchanges of assets covered by the STOCK Act) totaling over \$1,000 within 30 days of purchasing those securities. Accordingly, the U.S. Congress Buys and U.S. House Buys Strategy will not purchase securities at the same time as members of Congress. As a result, the U.S. Congress Buys and U.S. House Buys Strategy may purchase a security at a higher price or sell a security at a lower price than it would have if purchased or sold at the same time as the member of Congress, which may negatively affect performance. This reporting delay may cause the Strategy to include companies that have been sold by members of Congress, or not include companies that members of Congress have bought.

C. Limitations of Disclosure

The foregoing list of risks does not purport to be a complete enumeration or explanation of the risks involved in investing in investments. As investment strategies develop and change over time, Clients may be subject to additional and different risk factors. No assurance can be made that profits will be achieved or that substantial losses will not be incurred.

Item 9 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to an evaluation of such adviser or the integrity of such adviser's management. Streetbeat does not have any legal, financial, regulatory, or other "disciplinary" item to report to any Client. This statement applies to Streetbeat and to every employee of Streetbeat.

Item 10 - Other Financial Industry Activities and Affiliations

Streetbeat does not participate in any other financial industry activities. Streetbeat is affiliated with

Streetbeat Digital LLC (“Streetbeat Digital”), a money services business registered with the Financial Crimes Enforcement Network. (Streetbeat Digital, does not act as a money services business with respect to Streetbeat Client’s assets.) Clients of Streetbeat may choose to also become customers of Streetbeat Digital. However, all customers of Streetbeat Digital must first open an Account and become a Client of Streetbeat. If a Client of Streetbeat also becomes a customer of Streetbeat Digital, there is an inherent conflict of interest involving common ownership. Although Streetbeat is not directly compensated by a Client’s engagement with Streetbeat Digital, Streetbeat indirectly benefits due to the common ownership. The more commercially successful Streetbeat Digital is, the better it ultimately is for Streetbeat. Notwithstanding this conflict, Streetbeat believes that this arrangement does not interfere with its provision of advice to Clients because of its separate operating structure, separate personnel, and separate practices and controls. Streetbeat periodically reviews its primary vendors for adherence to their agreements.

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

A. Description of Code of Ethics

Streetbeat has adopted a code of ethics (the “Code of Ethics”) for all supervised persons of Streetbeat, describing its high standard of business conduct and fiduciary duty to its Clients pursuant to SEC rule 204A-1. The Code provides that each employee place the interests of the Adviser’s clients ahead of his/her own. The Code covers the following areas: Prohibited and Restricted Activities, Reporting Requirements, Certification of Compliance, Confidentiality, Recordkeeping Requirements, Insider Trading, and Compliance with Laws and Regulations. The Chief Compliance Officer will provide a copy of the Code to any Client or prospective client upon request. All supervised persons of Streetbeat must acknowledge the terms of the Code of Ethics annually, or as amended.

B. Recommendations Involving Material Financial Interests

Streetbeat anticipates that, in appropriate circumstances, consistent with Clients’ investment objectives, it will cause accounts over which Streetbeat has authority to effect the purchase or sale of securities in which Streetbeat, its management persons and/or Clients, directly or indirectly, have a position of interest. Streetbeat’s employees and persons associated with Streetbeat are required to follow Streetbeat’s Code of Ethics. Subject to satisfying this policy and applicable laws, officers, directors and employees of Streetbeat and its employees may trade for their own accounts in securities that are recommended to and/or purchased for Streetbeat’s Clients. The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of Streetbeat will not interfere with (i) making decisions in the best interest of Clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code of Ethics, certain classes of securities have been designated as exempt transactions, based upon a determination that personal employee transactions in these types of securities would not materially interfere with the best interest of Clients. Employee trading is continually monitored under the Code of Ethics, and to reasonably prevent conflicts of interest between Streetbeat and its Clients.

Employees’ accounts may trade in the same securities with Client accounts on an aggregated basis when consistent with Streetbeat’s obligation of best execution. In such circumstances, employee and Client accounts will share execution-related costs equally and receive securities at a total average price. Streetbeat will retain records of the trade order (specifying each participating account) and its allocation, which will be completed prior to the entry of the aggregated order. Completed orders will be allocated as specified in the initial trade order. Partially filled orders will be allocated on a pro rata basis. Any exceptions will be explained on the order.

Item 12 – Brokerage Practices

When a Client accepts the provision of Advisory Services, the Client grants Streetbeat the authority to select the broker-dealer(s) that will be used to place and execute the transactions in the Investment Accounts. Currently, Streetbeat uses Alpaca Securities to execute all Client transactions.

Best Execution

Best execution has been defined by the SEC as the “execution of securities transactions for clients in such a manner that the client’s total cost or proceeds in each transaction is the most favorable under the circumstances.” The best execution responsibility applies to the circumstances of each particular transaction. In its consideration of best execution, Streetbeat considers the full range and quality of a broker-dealer’s services, including:

- the ability to achieve prompt and reliable executions at favorable prices;
- the competitiveness of commission rates in comparison with other brokers satisfying Streetbeat’s overall selection criteria;
- the overall direct net economic result to Clients’ assets;
- the broker-dealer’s clearance and settlement capabilities;
- the operational efficiency with which transactions are effected;
- the financial strength, integrity, and stability of the broker;
- the ability to effect the transaction where a large block or other complicating factors are involved;
- the availability of the broker to execute possible difficult transactions in the future;
- the quality, comprehensiveness, and frequency of available research and related services considered to be of value, as contemplated by Section 28(e) of the Exchange Act and the regulations and interpretations of the SEC; and the quality, comprehensiveness and frequency of notifications of investment opportunities.

In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer’s services, including among others, the value of research provided, execution capability, commission rates, and responsiveness.

Streetbeat relies on its Custodian and review of its best execution reports to ensure compliance with best execution, as Streetbeat does not execute trades. The best execution report compares the execution price of each trade with the National Best Bid and Offer. The CCO is responsible for continuously monitoring and evaluating the performance and execution capabilities of broker-dealers that transact orders for Clients to ensure consistent quality executions.

The Platform requires the establishment of a brokerage account with the Custodian, Alpaca, which executes trades on behalf of Clients. Trades are cleared and settled by the Custodian, an unaffiliated clearing broker and qualified custodian for Streetbeat Client Investment Accounts. In selecting Alpaca, Streetbeat did not consider any gifts or entertainment; Alpaca's willingness to cover trade errors caused by Streetbeat; or client referrals or capital introduction. If permitted, based on the information provided in the Suitability Questionnaire, Clients may be offered the option to trade with margin through their Customer Account with Alpaca. Clients will be required to opt-in to margin trading through the Platform.

Alpaca executes trades upon receipt of the Client's order. Despite this, there may, depending on the liquidity and demand in the market, be a material change in the market price of the security being bought or sold.

Alpaca is generally responsible for: (i) maintaining and recording transactions in cash and securities in Investment Accounts; (ii) sending orders placed by the Client for execution, clearance, and settlement; and (iii) providing a Client with statements, confirmations, other required documentation, and other information about a Client's Investment Account and transactions therein. Clients authorize Alpaca to execute all trades and transactions a Client makes via the Platform and authorizes the Custodian to establish and carry a Client's Investment Account that holds Client securities and cash and records the transactions a Client has made.

Streetbeat may transmit or help facilitate a Client's requests for withdrawals or transfers to a Client's bank account and/or Alpaca. However, Streetbeat shall have no authority to initiate any withdrawal or otherwise to transfer any securities or money out of an Investment Account. Withdrawals and transfers are the sole responsibility of the Client.

As noted above, Alpaca, a third-party broker-dealer, will provide execution, custody, clearing and settlement services, and will serve as qualified custodian for Client Investment Account.

Brokerage Referrals

Streetbeat does not select broker-dealers based on solely on whether or not it may receive client referrals from a broker-dealer or third party. Streetbeat may seek to receive client referrals from broker-dealers and/or third-party exchanges in the future and will disclose any fees paid for these referrals and other details of the relationship, including potential conflicts of interest, to Clients by updating this Brochure appropriately.

Aggregating Trading for Multiple Accounts

To the extent that the Streetbeat determines to aggregate client orders for the purchase or sale of securities, including securities in which Streetbeat's supervised persons may invest, Streetbeat will generally do so in a fair and equitable manner in accordance with applicable rules promulgated under the Advisers Act and guidance provided by the staff of the SEC and consistent with policies and procedures established by the Streetbeat.

Clients will have the option to submit individual orders for execution, or alternatively, to have Streetbeat submit the Client's order as part of an aggregated order. Aggregated orders will receive securities at a total average price.

Item 13 - Review of Accounts

Streetbeat provides all Clients with continuous access to the Platform regarding information about Investment Account status, portfolio allocations, securities, and Investment Account balances. Streetbeat will contact and remind clients at least biannually via electronic channels to request that Clients update their personal information to account for any material changes that have occurred.

Clients have access to current Investment Account balances and positions through the Platform. The Custodian prepares account statements showing all transactions and account balances during the prior quarter. Clients are urged to compare the account statements they receive from the Custodian with those provided on the Platform. All information relating to Investment Accounts is provided on the Platform. Streetbeat requests that Clients reconfirm their current profile information as needed and will remind clients at least biannually to update their information on the Platform.

Item 14 - Client Referrals and Other Compensation

Streetbeat and its related persons do not receive an economic benefit (such as sales awards or other prizes) from any third party for providing investment advice or other advisory services to Clients. However, Streetbeat may receive from a broker-dealer or a fund company, without cost and/or at a discount, certain services and/or products, to assist in monitoring and servicing Investment Accounts. These may include investment-related research, pricing information and market data, software and other technology that provide access to Investment Account data, compliance and/or practice management-related publications, discounted or free consulting services, discounted or free attendance at conferences, meetings, and other educational or social events, marketing support, computer hardware or software, and other products used by Streetbeat to assist Streetbeat in its investment advisory business operations.

Client Referrals

Streetbeat offers cash payments to Clients for referring prospective clients to Streetbeat, consistent with applicable laws, including Advisers Act Rule 206(4)-1. The compensation arrangements are generally based on a fixed payment paid to the referring Client by Streetbeat and are disclosed to prospective Clients. Streetbeat operates the “Refer-a-Friend” program (“Program”). Under the Refer-a-Friend program, current Clients receive a special designated code and link that they may share with one or more of their friends and family. The link will allow the receiver to claim a fixed dollar amount (“Bonus”) if they choose to apply for and open an Account with Streetbeat. If accepted, the Bonus will be converted from the fixed dollar amount into Streetbeat’s Earnings Calls Strategy. New prospective clients must meet the eligibility requirements and adhere to the terms and conditions of Streetbeat’s Advisory Agreement. Current Client’s must adhere to the terms and conditions of the Refer-a-Friend Program Agreement, and their Accounts must be in and remain in good standing, as determined by Streetbeat in its sole discretion. The Bonus may not be immediately withdrawn from the Account, and any Bonus must remain in the Client’s Account for a minimum of 14 days. Please see the Referral Program Terms and Referral Agreement listed on Streetbeat’s website under the [Important Legal Disclosures](#). Participation in the Refer-a-Friend program is not available to non-U.S. residents or individuals who regularly provide investment advisory services to Clients in any U.S. state, or other ineligible persons. Streetbeat reserves the right to modify, extend or cancel the Refer-a-Friend program at any time without notice, in Streetbeat’s sole discretion.

Item 15 – Custody

Streetbeat does not maintain custody of Client’s funds or securities. All Client Investment Accounts are held with the Custodian.

Participation in the Platform requires that a Client agrees to the Custodian's customer agreement (the "Custodian Agreement"), whereby the Custodian will carry a brokerage account that holds Client securities and cash and will record Client transactions on the Platform as well as act as the clearing broker and qualified custodian for Client Investment Accounts. Neither Streetbeat nor any investment service provider engaged by Streetbeat is responsible for the obligations of the Custodian or any successor custodian.

Clients should receive, on at least a quarterly basis, statements from the broker-dealer, bank or other qualified custodian that holds and maintains the Client's investment assets. We urge you to carefully review such statements and compare such official custodial records to the reports that we may provide to you. Our reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Item 16 – Investment Discretion

Streetbeat provides non-discretionary services to Clients. Streetbeat obtains limited discretionary authority in connection with the allocation of Client funds to Investments making up a Strategy, as well as the limited discretionary authority to rebalance a position in a Strategy, but only after the Client has made the decision to invest. Once a Strategy is selected, Streetbeat is authorized to determine the appropriate amount of funds, based on the Client's Suitability Questionnaire, to be allocated to each of the Investments that make up the Strategy. Streetbeat will also obtain limited authority to rebalance, buy and sell Investments, based on the Strategy a Client chooses to allocate funds towards. Streetbeat may, depending on the assets in a Client's Account, obtain limited authority to sell (liquidate) certain holdings in a Client's Account in order to pay the Fee referenced in Item 5. Please see Items 4 - Advisory Services, and Item 5 - Fees and Other Compensation, for more detail on Streetbeat's limited discretionary authority.

This authorization will be granted by the Client through the execution of the Advisory Agreement, as well as through Alpaca's Customer Agreement. Clients maintain full discretion over their investment decisions and selection of a Strategy at all times. Further, Clients maintain full discretion over their decisions to buy and sell individual Investments outside of their decisions to invest in Strategies.

As described above, we also obtain the authority to designate the broker-dealers or other financial intermediaries through whom transactions in the accounts will be executed, cleared or settled (see Item 12 above).

Item 17 - Voting Client Securities

As a matter of firm policy and practice, Streetbeat does not have any authority to and does not vote proxies on behalf of Clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in such Client's portfolio. Clients will receive proxies and other solicitations directly from the designated custodian.

Streetbeat will neither advise nor act on behalf of the Client in legal proceedings involving companies whose securities are held or previously were held in the Client's account(s), including, but not limited to, the filing of "Proofs of Claim" in class action settlements.

Item 18 - Financial Information

Streetbeat does not require or solicit the prepayment of any fees six or more months in advance and does not have any adverse financial condition that is reasonably likely to impair Streetbeat's ability to

continuously meet its contractual commitments to its Clients. Streetbeat has not been the subject of a bankruptcy proceeding.