



## **Firm Brochure**

(Part 2A of Form ADV)

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**CRD No. 123567**

**March 30, 2023**

This brochure provides information about the qualifications and business practices of WallStreeti.com, LLC ("WSI"). If you have any questions about the contents of this brochure, please contact us at: (855) 888-9255 or by email at: <http://www.wallstreeti.com/contact.php>.

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or by any state securities authority.

Additional information about WSI is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

***References herein to WSI as a "registered investment adviser" or any reference to being "registered" does not imply a certain level of skill or training.***



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## **Item 2 - Material Changes**

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The Firm has been approved as a Mid-Sized Investment Adviser with the U.S. Securities and Exchange Commission ("SEC") and has withdrawn its state registrations with New York & California and will notice-file with these two jurisdictions in accordance with their respective statutes.

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### **Full Brochure Available**

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at: (855) 888-9255 or by email at: [info@wallstreeti.com](mailto:info@wallstreeti.com).



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## **Item 4 - Advisory Business**

WallStreeti.com, LLC ("WSI") is incorporated in the state of New York. WSI has been approved for registration as a mid-sized advisory firm with the SEC. WSI is solely owned by George Antonopoulos and is also WSI's CCO. In addition, WSI has contracted out with LSCG, Inc., and before that with L&S Consulting Group, Inc. to assist the firm with all its regulatory compliance obligations.

As described below, WSI offers to its clients (individuals, pension and profit sharing plans, trusts, and business entities) non-discretionary investment management services.

### **INVESTMENT MANAGEMENT SERVICES**

Clients can engage WSI to design an investment portfolio and provide ongoing corresponding investment management services on a *fee-only* basis. In the event the client determines to implement investment recommendations through WSI on a *fee-only* basis, WSI shall charge an annual investment management fee based upon a percentage of the market value of the assets being managed by WSI. The investment management fee charged shall vary (between 1.50% and 2.00%) depending upon the market value of assets under management and the type of assets under management:

Market Value of Portfolio	% of Assets
Up to \$3,000,000	2.00%
\$3,000,001 +	1.50%

WSI generally requires an account minimum of \$500,000.00 for investment management services. WSI's annual investment management fee shall be pro-rated and paid monthly, in arrears, based upon the market value of the assets on the last business day of the previous month. However, WSI, in its sole discretion, may require a lesser account minimum or charge a lesser investment management fee based upon certain criteria (i.e., anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, negotiations with client, etc.).

Currently, WSI recommends that certain clients allocate investment assets among mutual funds and/or independent manager programs offered by and/or obtained through Interactive Brokers.



Prior to engaging WSI to provide investment management services, the client will be required to enter into a formal *Investment Advisory Agreement* with WSI setting forth the terms and conditions under which WSI shall manage the client's assets. WSI's agreement shall authorize the custodian of the client's account to debit the account for the amount of the WSI's investment management fee and to directly remit that management fee to WSI in accordance with the firm's procedures. To implement that procedure, the client will provide written authorization permitting the advisory fees be deducted from their account held at the custodian. The custodian will send, at least quarterly, to client a statement reflecting the fee paid to WSI.

WSI may allocate investment management assets of its client accounts among various investments on a non-discretionary basis, in accordance with the investment objective of the client. The terms and conditions under which the client shall engage WSI shall be set forth in separate written agreements between the client and WSI. WSI maintains ongoing responsibility to select or make recommendations, based upon the needs of the client, as to the specific securities or other investments the account may purchase or sell.

**Please Note:** It remains the client's responsibility to promptly notify WSI if there is ever any change in his/her/its financial situation or investment objectives for the purpose of reviewing/evaluating/revising WSI's previous recommendations and/or services.

#### **DISCLOSURE STATEMENT**

A copy of WSI's written Brochure as set forth in this Part 2A of Form ADV shall be provided to each client prior to, or contemporaneously with, the execution of the *Investment Management Agreement*. Any client who has not received a copy of WSI's written Brochure at least 48 hours prior to executing the *Investment Management Agreement* shall have five (5) business days subsequent to executing the agreement to terminate WSI's services without penalty.

Neither WSI nor the client may assign the *Investment Advisory Agreement* without the prior consent of the other party. Transactions that do not result in a change of actual control or management of WSI shall not be considered an assignment.

WSI shall provide investment advisory services specific to the needs of each client. Prior to providing investment advisory services, an investment adviser representative will ascertain each client's investment objective(s). Thereafter, WSI shall allocate and/or recommend that the client allocate investment assets consistent with the designated investment objective(s). The client may, at any time, impose reasonable restrictions, in writing, on WSI's services.



WSI does not participate in a wrap fee program.

As of December 31, 2022, WSI had \$53,286,318 in assets under management on a non-discretionary basis.

## **Item 5 - Fees and Compensation**

### **INVESTMENT MANAGEMENT**

In the event the client desires, the client can engage WSI to design an investment portfolio and provide ongoing corresponding investment management services on a *fee-only* basis. In the event the client determines to implement investment recommendations through WSI on a *fee-only* basis, WSI shall charge an annual investment management fee based upon a percentage of the market value of the assets being managed by WSI. The investment management fee charged shall vary (between 1.50% and 2.00%) depending upon the market value of assets under management and the type of assets under management:

<b>Market Value of Portfolio</b>	<b>% of Assets</b>
<b>Up to \$3,000,000</b>	<b>2.00%</b>
<b>\$3,000,001 +</b>	<b>1.50%</b>

WSI will generally require a minimum account size of \$500,000 for investment management services. However, WSI in its sole discretion, will charge a lesser management fee or accept lesser account sizes, based upon certain criteria (i.e. existing financial planning client, anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, etc.).

WSI's annual investment fee shall be pro-rated and payable in arrears based upon the entity with which the assets are custodied and based upon the market value of the assets on the last business day of the month.

A fixed fee arrangement may be selected for certain clients. The amount due for this arrangement will be determined based on several factors: the value of the entire portfolio; the quantity of accounts; the extent to which our comprehensive financial planning services will be used. These include but are not limited to estate, tax and insurance planning. The fee will not change without prior consent by the client. The anticipated range of fixed fees are from \$200 to \$1,000.00



### **Other Fees**

Interactive Brokers charges commission rates which are generally considered discounted from customary retail commission rates. The commissions charged by Interactive Brokers may be higher or lower than those charged by other broker-dealers.

However, WSI will not receive any portion of the brokerage commissions and/or transactions fees charged to the client. In return for effecting securities transactions through Interactive Brokers or other designated broker/dealer custodian, WSI may receive certain investment research products and/or services which assist WSI in its investment decision-making process for the client.

The brokerage commissions and/or transaction fees charged by Interactive Brokers or other designated broker-dealer/custodian are exclusive of, and in addition to, WSI investment management fee. Although the commissions paid by WSI's clients shall comply with WSI's duty to obtain "best execution," a client may pay a commission that is higher than another qualified broker-dealer might charge to affect the same transaction where WSI determines, in good faith, that the commission is reasonable in relation to the value of the brokerage and research services received.

Factors that WSI considers in recommending a particular broker-dealer/custodian to clients include financial strength, reputation, reporting, operations, pricing, research, and service.

At all times clients have the option to purchase investment products recommended by WSI through unaffiliated brokers or agents.

WSI does not charge its advisory clients commissions and/or markups.

Please note lower fees for comparable services may be available from other sources.

### **Item 6 - Performance-Based Fees and Side-By-Side Management**

Neither WSI nor any supervised person of WSI accepts performance-based fees.

### **Item 7 - Types of Clients**

WSI's clients shall generally include individuals, pension and profit-sharing plans, trusts, and business entities. WSI requires an annual minimum account size of \$500,000 for investment advisory services.

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

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### **Methods of Analysis and Investment Strategies**

Security analysis methods involve the following fundamental analysis:

Modern Portfolio Theory – WSI's investment approach is firmly rooted in the belief that markets are “efficient” and that investor’s returns are determined primarily by asset allocation decisions, rather than market timing or security selection. WSI recommends diversified portfolios, principally through the use of passively managed mutual funds.

WSI may utilize the following investment strategies when implementing investment advice given to clients:

- Long Term Purchases (securities held at least a year) WSI’s investment philosophy is designed for investors who desire a buy and hold strategy, with an investment time horizon minimum of five years and preferably ten years or more.
- Short Term Purchases (securities sold within a year)

WSI’s methods of analysis and investment strategies do not present any significant or unusual risks. However, every method of analysis has its own inherent risks. To perform an accurate market analysis, WSI must have access to current/new market information. WSI has no control over the dissemination rate of market information; therefore, unbeknownst to WSI, certain analyses may be compiled with outdated market information, severely limiting the value of the WSI’s analysis. Furthermore, an accurate market analysis can only produce a forecast of the direction of market values. There can be no assurances that a forecasted change in market value will materialize into actionable and/or profitable investment opportunities.

WSI’s primary investment strategies - Long Term Purchases and Short-Term Purchases are fundamental investment strategies.

However, every investment strategy has its own inherent risks and limitations. For example, longer term investment strategies require a longer investment time period to allow for the strategy to potentially develop.

Shorter term investment strategies require a shorter investment time period to potentially develop but, as a result of more frequent trading, may incur higher transactional costs when compared to a longer-term investment strategy.



### **Risk of Loss**

WSI's methods of analysis and investment strategies do not present any significant or unusual risks.

Our investment programs have certain risks that are borne by the client. Our investment approach constantly keeps the risk of loss in mind. Clients face the following investment risks:

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic, global pandemic and social conditions may trigger market events.
- **Inflation Risk:** When inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities during periods of declining interest rates.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy and complex process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.



Currently, WSI primarily allocates client investment assets among various ETFs, mutual funds and/or fixed income securities, on a non-discretionary basis in accordance with the client's designated investment objective(s).

## **Item 9 - Disciplinary Information**

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Neither WSI, nor any of its management persons have been the subject of any disciplinary actions.

## **Item 10 - Other Financial Industry Activities and Affiliations**

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### **Broker-Dealer Registration**

WSI, nor its principals are registered with a broker/dealer.

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

Neither WSI, nor its representatives, are registered or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or a representative of the foregoing.

### **Material Relationships and Conflicts of Interests with Industry Participants**

WSI has no arrangements that are material to its advisory or its clients with a related person.

### **Material Conflicts of Interest Relating to Other Investment Advisers**

WSI does not receive, directly or indirectly, compensation from investment advisors that it recommends or selects for its clients.



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

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WSI maintains an investment policy relative to personal securities transactions. This investment policy is part of WSI's overall Code of Ethics, which serves to establish a standard of business conduct for all of WSI's members that is based upon fundamental principles of openness, integrity, honesty and trust, a copy of which is available upon request.

WSI also maintains and enforces written policies reasonably designed to prevent the misuse of material non-public information by WSI or any person associated with WSI.

Neither WSI nor any related person of WSI recommends, buys, or sells for client accounts, securities in which WSI or any related person of WSI has a material financial interest.

WSI and/or representatives of WSI *may* buy or sell securities that are also recommended to clients. This practice may create a situation where WSI and/or representatives of the firm are in a position to materially benefit from the sale or purchase of those securities. Therefore, this situation creates a potential conflict of interest. Practices such as "scalping" (i.e., a practice whereby the owner of shares of a security recommends that security for investment and then immediately sells it at a profit upon the rise in the market price which follows the recommendation) could take place if WSI did not have adequate policies in place to detect such activities. In addition, this requirement can help detect insider trading, "front-running" (i.e., personal trades executed prior to those of the WSI's clients) and other potentially abusive practices.

WSI has a personal securities transaction policy in place to monitor the personal securities transactions and securities holdings of each of WSI's "Access Persons". WSI's securities transaction policy requires that Access Person of WSI must provide the Chief Compliance Officer or his/her designee with a written report of their current securities holdings within ten (10) days after becoming an Access Person.

Additionally, each Access Person must provide the Chief Compliance Officer or his/her designee with a written report of the Access Person's current securities holdings at least once each twelve (12) month period thereafter on a date WSI selects; provided, however that at any time that WSI has only one Access Person, he or she shall not be required to submit any securities report described above.

WSI and/or representatives of WSI *may* buy or sell securities, at or around the same time as those securities are recommended to clients.



This practice creates a situation where WSI and/or representatives of the firm are in a position to materially benefit from the sale or purchase of those securities. Therefore, this situation creates a potential conflict of interest. As indicated above, WSI has a personal securities transaction policy in place to monitor the personal securities transaction and securities holdings of each of WSI's Access Persons.

WSI has implemented an investment policy relative to personal securities transactions. This investment policy is part of Applicant's overall Code of Ethics which serves to establish a standard of business conduct for all of WSI's members that is based upon fundamental principles of openness, integrity, honesty and trust.

WSI also maintains and enforces written policies reasonably designed to prevent the misuse of material nonpublic information by WSI or any person associated with WSI. Although commissions generated by the purchase of securities and insurance products through WSI or its members may or may not cause its recommendations to be free from self-interest, or a conflict of interest, the client is under no obligation to accept or implement the Applicant's recommendations.

## **Item 12 - Brokerage Practices**

### **RESEARCH AND ADDITIONAL BENEFITS**

Although not a material consideration when determining whether to recommend that a client utilize the services of a particular broker-dealer/custodian, WSI may receive from Interactive Brokers (or another broker-dealer/custodian) without cost (and/or at a discount) support services and/or products, certain of which assist WSI to better monitor and service client accounts maintained at such institutions. Included within the support services that may be obtained by WSI may be investment-related research, pricing information and market data, software and other technology that provide access to client account data, compliance and/or practice management-related publications, discounted or gratis consulting services, discounted and/or gratis attendance at conferences, meetings, and other educational and/or social events, marketing support, computer hardware and/or software and/or other products used by WSI in furtherance of its investment advisory business operations.

As indicated above, certain of the support services and/or products that *may* be received may assist WSI in managing and administering client accounts. Others do not directly provide such assistance, but rather assist WSI to manage and further develop its business enterprise. WSI's clients do not pay more for investment transactions effected and/or assets maintained at Interactive Brokers as a result of this arrangement.



There is no corresponding commitment made by Interactive Brokers or any other any entity to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as result of the above arrangement.

WSI's Chief Compliance Officer, George Antonopoulos remains available to address any questions that a client or prospective client may have regarding the above arrangement and any corresponding perceived conflict of interest such arrangement may create.

WSI does not generally accept directed brokerage arrangements (when a client requires that account transactions be affected through a specific broker-dealer). In such client directed arrangements, the client will negotiate terms and arrangements for their account with that broker-dealer, and WSI will not seek better execution services or prices from other broker-dealers or be able to "batch" the client's transactions for execution through other broker-dealers with orders for other accounts managed by WSI. As a result, client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case.

**Please Note:** In the event that the client directs WSI to effect securities transactions for the client's accounts through a specific broker-dealer, the client correspondingly acknowledges that such direction may cause the accounts to incur higher commissions or transaction costs than the accounts would otherwise incur had the client determined to effect account transactions through alternative clearing arrangements that may be available through WSI.

WSI's Chief Compliance Officer, George Antonopoulos, remains available to address any questions that a client or prospective client may have regarding the above arrangement.

To the extent that WSI provides investment management services to its clients, the transactions for each client account generally will be affected independently, unless WSI decides to purchase or sell the same securities for several clients at approximately the same time. WSI may (but is not obligated to) combine or "bunch" such orders to obtain best execution, to negotiate more favorable commission rates or to allocate equitably among WSI's clients differences in prices and commissions or other transaction costs that might have been obtained had such orders been placed independently. Under this procedure, transactions will be averaged as to price and will be allocated among clients in proportion to the purchase and sale orders placed for each client account on any given day. WSI shall not receive any additional compensation or remuneration as a result of such aggregation.

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## **Item 13 - Review of Accounts**

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For those clients to whom WSI provides investment supervisory services, account reviews are conducted on an ongoing basis by WSI's principal. All investment advisory clients are advised that it remains their responsibility to advise WSI of any changes in their investment objectives and/or financial situation. All clients (in person or via telephone) are encouraged to review financial planning issues (to the extent applicable), investment objectives and account performance with WSI at a minimum on an annual basis.

WSI may conduct account reviews on an other than periodic basis upon the occurrence of a triggering event, such as a change in client investment objectives and/or financial situation, market corrections and client request.

Clients are provided, at least quarterly, with written transaction confirmation notices and regular written summary account statements directly from the custodian. WSI may also provide a written periodic report summarizing account activity and performance.

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

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### **Economic Benefits for Providing Services to Clients**

WSI does not accept an economic benefit from anyone for providing investment advice or other advisory services to its clients.

### **Compensation to Non-Supervised Persons for Client Referrals**

WSI does not accept referrals for compensation for client referrals.



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## **Item 15 - Custody**

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WSI shall have the ability to have its advisory fee for each client debited by the custodian on a monthly basis. Clients are provided, at least quarterly, with written transaction confirmation notices and regular written summary account statements directly from the broker-dealer/custodian and/or program sponsor for the client accounts. WSI may also provide a written periodic report summarizing account activity and performance.

In its efforts to safeguard the firm from being deemed a custodian, WSI ensures the following:

- (a) Copies of the invoice to the custodian or trustee are sent at the same time that WSI sends a copy to the client.
- (b) The custodian sends quarterly statements to its clients showing all disbursements for the custodian account, including the amount of the advisory fees.
- (c) Clients provide written authorization permitting WSI to be paid directly for their accounts held by the custodian.

**Please Note:** To the extent that WSI provides clients with periodic account statements or reports, the client is urged to compare any statement or report provided by WSI with the account statements received from the account custodian.

**Please Also Note:** The account custodian does not verify the accuracy of WSI's advisory fee calculation.

## **Item 16 - Investment Discretion**

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The firm does not offer discretionary investment management services.



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## **Item 17 - Voting Client Securities**

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WSI does not vote client proxies. Therefore, although WSI may provide investment advisory services relative to client investment assets, WSI's clients maintain responsibility for: (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the client's investment assets. WSI and/or the client shall correspondingly instruct each custodian of the assets to forward to the client copies of all proxies and shareholder communications relating to the client's investment assets.

Clients may contact WSI to discuss any questions they may have with a particular solicitation.

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## **Item 18 - Financial Information**

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WSI does not solicit fees of more than \$500.00 per client, six months or more in advance.

WSI has not been the subject of a bankruptcy petition.

**ANY QUESTIONS:** WSI's Chief Compliance Officer, George Antonopoulos, remains available to address any questions that a client may have regarding the above disclosures and arrangements.



## **Item 19 – Requirements for State-Registered Advisers**

**George Antonopoulos, Born 1968**

**A) Formal Education and Background:**

Name of School	Year Graduated	Degree	Major
University of Colorado	1991	BA	Economics
University of Colorado	1994	MBA	Finance

Name of Employer	Type of Business	Period of Employment
WallStreeti.com, LLC	President	10/2002 - Present
UBS Financial Services	Registered Representative	10/1998 to 10/2002

**B) Outside Business Activities:**

**Not Applicable**

**C) Performance-Based Fees:**

**Not Applicable**

**D) Disciplinary Matters:**

Neither WSI or George Antonopoulos has not been involved in any arbitration claim or civil, self-regulatory organization, or administrative proceeding involving an investment or investment-related business or activity, fraud, false statement(s), or omissions, theft, embezzlement, or other wrongful taking of property, bribery, forgery, counterfeiting, or extortion, or dishonest, unfair, or unethical practices. Additionally, he has not been the subject of a bankruptcy petition.



**E) Relationships or arrangements that is material to your advisory business:**

WSI and George Antonopoulos do not have any relationship or arrangement with an issuer of securities not listed on ADV Part 2A.

Please note WSI does not believe there are any material conflicts of interest relating to the firm's representatives and/or employees that could be reasonably expected to impair the rendering of unbiased or objective advice to its clients.