



FORM ADV PART 2A LIME ADVISORY CLIENT BROCHURE

Lime Advisory Corp.
One Pennsylvania Plaza, 16th Floor
New York, NY 10119

646.558.3232

www.limeadvisory.com

December 31, 2022

ITEM 1 - COVER PAGE

This brochure provides information about the qualifications and business practices of Lime Advisory Corp. ("Lime Advisory"), a registered investment adviser. Registration does not imply a certain level of skill or training but only indicates that Lime Advisory has registered its business with state and federal regulatory authorities, including the United States Securities and Exchange Commission ("SEC"). If you have any questions about the contents of this brochure, please contact us at support@limeadvisory.com. The information in this brochure has not been approved or verified by the SEC or by any state securities authority.

Additional information about Lime Advisory Corp. is available on the SEC's website at www.adviserinfo.sec.gov.

ITEM 2 - SUMMARY OF MATERIAL CHANGES

The material changes in the brochure from the last annual updating amendment of Lime Advisory are described below.

Since the last updating amendment to Lime Advisory's Form ADV Part 2A, dated December 31, 2021, there have been no material changes to this brochure.

ITEM 3 - BROCHURE TABLE OF CONTENTS

Item 1 - Cover Page	1
Item 2 - Summary of Material Changes	2
Item 3 - Brochure Table of Contents	3
Item 4 - Advisory Business	4
Item 5 - Fees and Compensation	5
Item 6 - Performance-Based Fees and Side-By-Side Management	6
Item 7 - Types of Clients	6
Item 8 - Methods of Analysis, Investment Strategies and Risk of Loss	6
Item 9 - Disciplinary Information	9
Item 10 - Other Financial Industry Activities and Affiliations	9
Item 11 - Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	9
Item 12 - Brokerage Practices	10
Item 13 - Review of Accounts	11
Item 14 - Client Referrals and Other Compensation	11
Item 15 - Custody	12
Item 16 - Investment Discretion	12
Item 17 - Voting Client Securities	12
Item 18 - Financial Information	12
Form ADV Part 2A – Appendix 1	13
Form ADV Part 2B	25

ITEM 4 - ADVISORY BUSINESS

FIRM DESCRIPTION

Lime Advisory Corp. ("Lime Advisory"), a Delaware corporation, formed in 2018, is an investment adviser, registered with the U.S. Securities and Exchange Commission ("SEC") that maintains its principal office at One Pennsylvania Plaza, 16th Floor, New York, NY 10119. Lime Advisory is a wholly owned subsidiary of FH Global, Inc. ("Holdings"), which is also the parent company of Lime Trading Corp, Lime Digital, LLC, and Lime FinTech, LLC.

TYPES OF ADVISORY SERVICES

Lime Advisory offers investment advisory services to clients primarily over the internet via its interactive online platform and mobile application (collectively, Lime Advisory's "online interface").

This Brochure is meant to help you understand the nature of the advisory services offered by Lime Advisory, whether the advisory services offered by Lime Advisory are right for you, and the potential conflicts of interest associated with Lime Advisory services. You should review it carefully.

Lime Advisory provides investment advice and discretionary asset management services for clients that include portfolios composed of U.S. equities and exchange traded fund ("ETF") investments, as well as a cash management offering. Traditional securities portfolios consist of sets of diversified stock and option allocations, which Lime Advisory constructs, as further described in Item 8 below. Traditional securities portfolios and Lime Advisory's cash management offering are offered through the Wrap Fee Program, as defined and further described in the Wrap Fee Program Brochure Appendix below (traditional securities portfolios and cash management, collectively "wrap accounts").

A wrap fee program has a fee structure that provides clients with advisory and brokerage services for a bundled fee with no additional account activity charges for execution of trades. As such, Lime Advisory charges Wrap Fee Program clients a single bundled fee that covers the investment advisory services it provides, as well as the brokerage and custodial services associated with holding and trading securities provided by its affiliated broker-dealer, Lime Trading Corp.

Retail Client accounts are managed by Lime Advisory pursuant to each client's Advisory Agreement and the client's instructions.

No minimum account size is required to maintain a Lime Advisory Digital wrap account. The minimum initial deposit is \$10.

For information about the types of clients Lime Advisory services, please refer to Item 7 - Types of Clients. For more information about the investment advisory services Lime Advisory provides through its Wrap Fee Program, please see the Wrap Fee Program Brochure Appendix attached below.

Lime Advisory's investment advisory services relating to Wrap Fee Program are not designed to provide clients with a comprehensive financial plan and Wrap Fee Program services are built to advise clients on how to achieve particular financial goals that clients indicate in their account. All of Lime Advisory's services are highly dependent on receiving accurate information from clients. If clients provide Lime Advisory with inaccurate information or fail to update promptly the information provided to Lime Advisory when it changes, the quality and applicability of Lime Advisory's investment advisory services could be materially impacted.

In addition, there are other pieces of information about a client's personal financial situation that are not elicited through Lime Advisory's online interface that could inform Lime Advisory's advice if it were provided to Lime Advisory. Similarly, not every piece of information that Lime Advisory collects is factored into your investment advice. Clients should consider this limitation on Lime Advisory's service, which is a function of Lime Advisory primarily providing an internet-based service.

TAILORED SERVICES AND INVESTMENT RESTRICTIONS

WRAP FEE PROGRAM

With respect to Lime Advisory's Wrap Fee Program, clients can choose among several portfolio strategies described in the Wrap Fee Program Appendix attached below. To use Lime Advisory's services, clients and/or their Advisors must inform Lime Advisory of their financial situation and preferences through Lime Advisory's online interface.

Lime Advisory solicits input on a client's anticipated investment needs in order to recommend an investment strategy to determine which assets a client's account will be invested (the "Allocation"). Lime Advisory's advice framework is described in more detail in the Lime Advisory Wrap Fee Program Appendix.

As described above, Lime Advisory offers its investment advisory services for wrap accounts through the Lime Advisory Wrap Fee Program. For more information about the Wrap Fee Program, please see the Wrap Fee Program Brochure Appendix attached below. Lime Advisory charges a wrap fee that covers the cost of its investment advisory services, as well as custody and trading services provided by its affiliate, Lime Trading Corp.

ASSETS UNDER MANAGEMENT

As of December 31, 2022, Lime Advisory managed \$0.00 in client assets on a discretionary basis. This total is calculated using the closing U.S. market prices from December 31, 2022.

ITEM 5 - FEES AND COMPENSATION

A. *Wrap Fee Program*

Lime Advisory charges an asset-based wrap fee that covers the costs of its investment advisory services as well as associated trading and custody services provided by its affiliated broker-dealer, Lime Trading Corp. Lime Advisory's asset-based wrap fees are calculated based on client's Wrap Account Balance (as defined below) as of the close of each calendar month and charged by the first business day of each month.

Clients pay a \$3.99 per month wrap fee for their wrap accounts (\$47.88 annually). If at any point, a Client's Total Account Balance (as defined below) exceeds \$5,000, that client will pay an annualized wrap fee of 0.45% of their Wrap Account Balance instead of the \$3.99 per month fee. For any day that a Client's Total Account Balance is less than \$5,000 and that client does not otherwise qualify for the asset-based fee, they will be charged the daily equivalent of the \$3.99 monthly fee for that day. For clients with Total Account Balances around \$5,000, the monthly fee may be more than \$3.99 per month if on certain days the Total Account Balance exceeded \$5,000. "Total Account Balance" is the combined account balance of Client's Lime Advisory accounts. "Wrap Account Balance" is the account balance in Client's traditional securities accounts.

Program Appendix. For certain clients, Lime Advisory's annualized wrap fee may be reduced by discounts and other promotions, including those described below. For more information about the fees associated with Lime Advisory's Wrap Fee Program, please refer to the Wrap Fee Program Brochure Appendix attached below.

On the last business day of the relevant period (month or quarter), Lime Advisory instructs Lime Trading Corp. to sell securities in an amount that will generate cash proceeds to satisfy a client's fee obligation, if the client has not established a valid credit card payment authorization for the payment of fees due. If a client's account exclusively consists of mutual funds, due to small price fluctuations in mutual funds that may occur on the transaction date (the last business day of the period), Lime Advisory will accrue any fees over-or under-assessed and apply the difference to adjust the following period's fees. Lime Advisory will automatically debit the prorated amounts of the fees from the assets in a client's account on a monthly or quarterly, as applicable, basis.

B. Discounts

For certain clients, Lime Advisory's wrap fee is reduced by discounts and other promotions, including those described below. All of Lime Advisory's asset-based fees for Retail Clients are subject to a discount (the "Discount") on the portions of their balances above \$2 million.

Lime Advisory reserves the right, at its sole discretion, to waive portions of its fees or offer pricing that differs from its standard fees.

ITEM 6 - PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

Accredited clients may pay an annual fee of 2.00% of assets under management along with a 20.00% performance fee based on capital appreciation. If the client's portfolio rises in value, the client will pay 20.00% on that increase in value, but if the portfolio drops in value, the client will not incur a new performance fee until the portfolio reaches the last highest value, adjusted for withdrawals and deposits, which is generally known as a "high water mark." Such client accounts will be disclosed to the client prior to the establishment of any such fee structure.

The high-water mark will be the highest value of the client's account on the last day of any previous quarter, after accounting for the client's deposits or withdrawals for each billing period.

ITEM 7 - TYPE OF CLIENTS

Lime Advisory's clients include individuals, trusts and other legal entities (subject to Lime Advisory's approval) who are U.S. residents and maintain a checking account with a U.S. bank. Lime Advisory may permit clients from other jurisdictions, however, due to regulatory requirements, additional documentation may be required. There is no minimum account size to maintain a wrap account with the Lime Advisory plan. Retail Client accounts are managed by Lime Advisory pursuant to each client's Advisory Agreement and the client's instructions.

ITEM 8 - METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

INVESTMENT STRATEGIES

Lime Advisory currently offers several traditional securities portfolio strategies composed primarily of stock and bond ETFs to retail clients. Lime Advisory's Executive Investment Committee (the "EIC") is responsible for Lime Advisory's investment strategy, portfolio management, advice, and financial planning models, consistent with its charter and Lime Advisory's policies. The EIC determines which portfolio strategies to make available to clients directly and through Advisors and oversees each portfolio strategy, except to the extent described below.

LIME ADVISORY CONSTRUCTED PORTFOLIOS

Lime Advisory constructs portfolios composed of securities for which Lime Advisory selects the underlying securities and weightings of those securities associated with particular Allocations. The portfolios are composed of equities and publicly traded exchange-traded funds ("ETF") securities. The selection process is intended to satisfy a broad set of potential client financial goals, including but not limited to maximizing returns, minimizing investment costs, limiting volatility, and diversifying investments.

Information concerning the current Lime Advisory Constructed Portfolios is available at www.limeadvisory.co.

In the future, Lime Advisory may construct additional portfolio strategies to provide more investment options to investors.

METHODS OF ANALYSIS

Wrap Fee Program

For information about the methods of analysis utilized in Lime Advisory's Wrap Fee Program, including Lime Advisory's portfolio management tools available in the Wrap Fee Program, please refer to the Wrap Fee Program Brochure Appendix below, specifically in Item 6: Portfolio Selection and Evaluation.

RISK FACTORS

Investing involves risk that clients should be prepared to bear. Lime Advisory does not guarantee the future performance of any client account or portfolio. Clients must understand that investments made pursuant to its investment advisory services involve risk and are subject to various market, currency, economic, security, and business risks. Clients should carefully consider the risks and uncertainties described below before investing with Lime Advisory. These risks are not the only ones Lime Advisory faces, additional risks and uncertainties that Lime Advisory is unaware of or deem immaterial may also become important factors that adversely impact Lime Advisory's business or client investments.

A. *Generally Applicable Risks*

Market Risk: Client investments and Lime Advisory's investment advisory services are directly impacted by market conditions that are outside of Lime Advisory's control, such as economic and political conditions, changes and volatility in financial markets, volatility of particular investments, changes in markets in which such transactions are processed, interest rates, inflation rates, regulatory changes, and other broad political, social, and economic trends. These changes can arise suddenly and the full impact of market changes on investments can remain uncertain. Market risk includes:

- **Market Decline Risk:** Market declines, such as a recession or other prolonged downturns in investment markets, may adversely affect clients' investment performance. Significant downturns in general economic or political conditions may also cause clients to be reluctant to make additional investments.
- **Asset Concentration Risk:** If a client has a high allocation to a particular asset class or classes, to the extent those asset classes underperform relative to other assets in the market, client's overall performance may be adversely affected. Conversely, if a client has a low allocation to a particular asset class or classes that outperform the market over a particular period, client's investments may underperform relative to the overall market.
- **Volatility Risk:** Lime Advisory's advisory services are based in part upon assumptions derived from historical returns, expected returns, and past price volatility. Past performance is no guarantee of future results, and any historical returns, expected returns, or probability projections may not reflect actual future performance.
- **Correlation Risk:** While Lime Advisory strives to construct diversified portfolio strategies, it is possible that different or unrelated asset classes may exhibit similar price changes in similar directions, which may adversely affect a client's account and may become more acute in times of market upheaval or high volatility.
- **Liquidity Risk:** While Lime Advisory strives to ensure client trades are executed at the best prices reasonably available under the circumstances, illiquid markets for an investment may prevent clients from selling their investments at all, or at an advantageous time or price. With respect to traditional securities portfolios, Lime Advisory's use of exchange traded funds in its offered portfolio strategies mitigates liquidity risk because ETFs tend to be very liquid, but this risk cannot be completely eliminated. Additionally, clients who hold fractional shares of ETFs in their portfolios may be unable to transfer fractional shares outside of the Lime Advisory platform because markets for fractional shares do not exist.
- **Inflation, Currency, and Interest Rate Risk:** Asset prices and portfolio returns will likely vary in response to changes in inflation and interest rates. Inflation causes the value of future dollars to decline and may reduce the purchasing power of an investor's future earnings. Inflation also generally leads to higher interest rates, which may cause the value of many types of investments to decline.

Investment Advice Risk: Lime Advisory does not guarantee the results of any investment advice given to clients. All investing involves risk, and Lime Advisory makes no assurances that the investment objectives of any offered portfolio strategy will be achieved. Although Lime Advisory offers diversified portfolio strategies, there is no guarantee that any particular asset allocation or mix of investments will provide a specified return or meet clients' investment objectives. Lime Advisory's services are highly dependent on receiving accurate information from clients, and Lime Advisory does not independently verify the accuracy or completeness of provided information. If clients provide Lime Advisory with inaccurate information or fail to promptly update information provided to Lime Advisory when it changes, the quality and applicability of Lime Advisory's advisory services could be adversely impacted.

Software and Algorithm Risk: Lime Advisory provides investment advisory services primarily over the internet. Clients input information about themselves and their investing goals in Lime Advisory's online interface and its software generates recommendations and constructs and manages portfolios based on information provided. Although Lime Advisory has standards governing the design, development, and testing of software before launching software into production with client assets, there is a risk that software may not perform as intended or as disclosed. For example, Lime Advisory's algorithms may not perform as intended for a variety of reasons, including but not limited to incorrect assumptions, changes in the market, available liquidity, and/or changes to data inputs. Lime Advisory periodically modifies its algorithms, or a computer system's code or underlying assumptions, and these changes may have unintended consequences. Lime Advisory conducts testing designed to ensure that its algorithms continue to function as intended when new code is introduced, and existing code is updated. Although such testing is intended to ensure that code changes do not create unintended consequences, clients should understand that testing, no matter how comprehensive, cannot guarantee the absence of code-related issues with the Lime Advisory algorithms.

Security Risk: As technology has become more common in financial services, client accounts have become potentially more susceptible to operational, information security, and related risks through breaches in cybersecurity. While Lime Advisory strives to maintain reasonable and appropriate safeguards to ensure the security of its systems and software, a cyber incident may result from either intentional attacks or unintentional events and include, but are not limited to, gaining unauthorized access to login credentials or to digital systems, mis-appropriating assets or sensitive information, causing a client account to lose proprietary information, corrupting data, or causing operational disruption, including denial-of-service attacks on websites. Lime Advisory has established policies and procedures reasonably designed to reduce the risks associated with cyber incidents, including the risk that federal securities laws are broken due to a cyber incident. However, there can be no assurance that these policies and procedures will prevent cyber incidents.

Regulatory Risk: Investment 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 US 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.

B. Other Risks

There are additional risks and uncertainties an investor should consider, including but not limited to: credit risk, emerging market risk, operational risk, and brand and reputational risk.

There also may be risks that the Lime Advisory may be unaware of or that it currently sees as immaterial but may impact your investment. Clients should read Lime Advisory's entire Form ADV Brochure, Wrap Program Brochure Appendix, as well as other materials that may be provided by Lime Advisory when deciding whether to use Lime Advisory's services.

ITEM 9 - DISCIPLINARY INFORMATION

Lime Advisory has not been subject to any disciplinary events by regulators nor is it party to any legal events that are material to client evaluation of its advisory business.

ITEM 10 - OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

Lime Advisory is a wholly owned subsidiary of FH Global, Inc., which is also the parent company of Lime Trading Corp., Lime Digital, LLC, Lime FinTech, LLC and Lend Academy Investments, LLC.

Lime Trading Corp., Lime Advisory's affiliate, provides custody and execution services for wrap accounts. Lime Trading Corp. is both a carrying and introducing broker registered with the Financial Industry Regulatory Authority ("FINRA") and a member of the SIPC, whose sole purpose is to service Lime Advisory's clients and carry accounts that Lime Advisory manages pursuant to discretionary authority granted to by Lime Advisory's clients. Lime Trading Corp. exercises no discretion with respect to client accounts. Lime Trading Corp. has entered into agreements with multiple clearing brokers, whereby Lime Trading Corp. instructs these clearing brokers to clear and settle Lime Advisory's clients' transactions on an omnibus basis.

Lime Digital, LLC is a money services business, but is not currently providing any such services.

Lime FinTech, LLC is a financial technology company which provides various technology products related to the securities industry.

Lend Academy Investments, LLC is an SEC registered investment advisor which provides access to certain investors in the peer-to-peer lending area. The financial offerings of Lend Academy Investments, LLC are not available through Lime Advisory, or included in any of its portfolio offerings.

OTHER MATERIAL RELATIONSHIPS

Neither Lime Advisory nor any of its management persons have a relationship or arrangement that is material to its advisory business.

ITEM 11 - CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

Lime Advisory maintains a Code of Ethics designed to ensure Lime Advisory meets its fiduciary obligations to clients and detects and prevents violations of securities laws. Lime Advisory's Code of Ethics establishes standards of conduct for all officers and employees consistent with the code of ethics requirements of Rule 204A-1 under the Investment Advisers Act.

A copy of Lime Advisory's Code of Ethics is available to clients and prospective clients upon request by emailing support@lime.co.

Lime Advisory or individuals associated with Lime Advisory are permitted to buy or sell assets identical to or different from those recommended to clients for their personal accounts. Individuals associated with Lime Advisory are also Lime Advisory clients. In addition, any related person(s) may have an interest or position in certain assets which may also be recommended to a client. In such instances, Lime Advisory or its related persons may have a financial incentive to buy or sell such assets for client accounts, although this incentive is limited because Lime Advisory generally recommends highly liquid securities to its clients and because client activity in such securities is unlikely to materially impact their price. Lime Advisory endeavors to always make decisions in the best interest of its clients and to eliminate, mitigate, and disclose conflicts of interest that arise between Lime Advisory and clients.

It is the express policy of Lime Advisory that no person employed by Lime Advisory may use material, non-public information obtained during the course of his or her work in deciding whether to purchase or sell any asset prior to any pending transaction(s) being executed for an advisory account. This policy is intended to prevent employees from benefiting from transactions placed on behalf of advisory accounts.

ITEM 12 - BROKERAGE PRACTICES

WRAP FEE PROGRAM

In order to open a Wrap Fee Program account with Lime Advisory, clients must establish a brokerage relationship with Lime Trading Corp., an affiliated broker-dealer registered with the SEC and a member of the Financial Industry Regulatory Authority and the Securities Investor Protection Corporation. By entering into an Advisory Agreement with Lime Advisory, clients authorize and direct Lime Advisory to place all securities trades in their accounts through Lime Trading Corp. As such, Lime Trading Corp. will maintain all client Wrap Fee Program accounts and execute all securities transactions in client accounts without separate commission costs or other fees. Lime Trading Corp. exercises no discretion in determining if and when securities trades are placed; it places securities trades only at the direction of Lime Advisory. Lime Advisory's procedures are designed to make every attempt to obtain the best execution reasonably available under the circumstances at that time, although there can be no assurance that it can be obtained. Clients should understand that the appointment of Lime Trading Corp. as the sole broker for their accounts under this Wrap Fee Program may result in disadvantages to the client as a possible result of less favorable executions than may be available through the use of a different broker-dealer. More information related to trading and custody of securities in the Wrap Fee Program can be found in the Wrap Fee Program Appendix in "Trade Execution, Account Maintenance, and Asset Custody" below.

ORDER AGGREGATION

With respect to its Wrap Fee Program, Lime Advisory places aggregated orders involving multiple Lime Advisory accounts trading in the same securities. In conducting these transactions no client is favored over any other client and each client that participates in an aggregated transaction will participate at the average share price for transactions in the aggregated order. Lime Advisory or its affiliates do not charge separate fees for any trade execution or custody service provided to clients.

Orders for the purchase or sale of securities are routed by Lime Trading Corp. to the public markets for execution.

Lime Trading Corp. is entitled to receive payments or rebates on orders from Lime Advisory, but Lime Trading Corp. does not pass on any portion of such payments to Lime Advisory or its clients.

RESEARCH AND SOFT DOLLAR BENEFITS

Lime Advisory does not receive research or other products and services other than execution from its affiliated broker-dealer, Lime Trading Corp., in connection with client Wrap Fee Program transactions.

BROKERAGE FOR CLIENT REFERRALS

Lime Advisory does not work with broker-dealers other than its affiliate, Lime Trading Corp., and Lime Advisory does not receive client referrals from Lime Trading Corp.

DIRECTED BROKERAGE

Lime Advisory clients are required to maintain wrap accounts and execute Wrap Fee Program transactions through Lime Trading Corp. Lime Advisory does not permit clients to direct brokerage.

ITEM 13 - REVIEW OF ACCOUNTS

As part of all its service offerings, Lime Advisory's software monitors client accounts on an ongoing basis. Lime Advisory's algorithms are developed and overseen by its investment advisory personnel and Executive Investment Committee (EIC).

Lime Advisory's algorithms continuously review clients' accounts to confirm their portfolios are within a set range of their Allocation. If a client's portfolio deviates from this range, Lime Advisory will rebalance such portfolio back to its target Allocation in certain circumstances. Lime Advisory personnel further conduct focused reviews of accounts when triggered by certain account activity, although clients should be aware that their individual accounts are generally not actively monitored directly by investment advisory personnel.

Lime Advisory's investment tools are designed to provide clients with continuous access to account information through Lime Advisory's online interface. Clients can utilize various tools on the interface to review their account and better understand their holdings and performance information. Clients also receive periodic emails from Lime Advisory with information about their accounts as well as links to account statements.

Clients are directed on a regular basis to update their financial situation or investment preferences and impose any reasonable restrictions on the management of their accounts. At any time, clients may update their financial profile and settings information in their account through Lime Advisory's online interface.

Clients can log into their account through Lime Advisory's online interface at any time to review their account. Clients receive monthly account statements from Lime Trading Corp., as well as trade confirmations for Wrap Fee Program purchases.

ITEM 14 - CLIENT REFERRALS AND OTHER COMPENSATION

Lime Advisory may offer compensation to current clients, affiliate marketers (including "bloggers"), solicitors, and other strategic partners who recommend Lime Advisory and refer new clients for certain Lime Advisory accounts (collectively, "Promoters"). The compensation received by a Promoter for referring a client will depend on the amount of that client's initial deposit and it is used to purchase securities in a Wrap Fee Program account.

Lime Advisory supervises the referral activities of current clients and any Promoters. Due to compensation from Lime Advisory, Promoters have an incentive to recommend Lime Advisory, which is a conflict of interest. Clients are not charged any fee nor do they incur any additional costs for being referred to Lime Advisory by a current client or other Promoter.

ITEM 15 - CUSTODY

Lime Trading Corp., Lime Advisory's affiliate, provides custody and execution services for Lime Advisory's Wrap Fee Program clients. Lime Trading Corp. is both a carrying and introducing broker registered with FINRA and a member of the SIPC, whose sole purpose is to service Lime Advisory's clients and carry accounts that Lime Advisory manages pursuant to discretionary authority granted to by Lime Advisory's clients. As a condition of participating in Lime Advisory's Wrap Fee Program, clients must open a brokerage account with Lime Trading Corp. Lime Trading Corp. exercises no discretion with respect to client accounts. Lime Trading Corp. has entered into agreements with multiple clearing firms, pursuant to which the clearing firms serve as its clearing brokers. Lime Trading Corp. instructs the clearing firms to clear and settle Lime Advisory's clients' Wrap Fee Program transactions on an omnibus basis.

For purposes of the Advisers Act, Lime Advisory has custody of client assets because Lime Advisory has access to deduct its advisory fees directly from client assets.

ITEM 16 - INVESTMENT DISCRETION

Lime Advisory's Wrap Fee Program is a discretionary account, meaning Lime Advisory can buy and sell investments on clients' behalf when it determines it is appropriate to do so. Lime Advisory provides clients with information about its offered portfolio strategies to inform their decision-making but does not make recommendations to clients that they invest in any particular strategy.

ITEM 17 - VOTING CLIENT SECURITIES

With respect to the Wrap Fee Program, Lime Advisory clients are set up to receive and vote all proxies and related materials for any security held in Lime Advisory accounts. Lime Advisory will not vote on proxies associated with and security for any portfolio in which it is held. Clients may request a copy of Lime Advisory's proxy policies and procedures, which may be updated from time to time, by emailing support@lime.co.

Lime Advisory Securities earns revenue from companies that issue proxies, for facilitating the processing and delivery of the proxies to Lime Advisory's clients.

ITEM 18 - FINANCIAL INFORMATION

Balance Sheet Requirement: Lime Advisory does not require or solicit prepayment of more than \$1,200 in advisory fees per client, six months or more in advance. Therefore, Lime Advisory is not required to include a financial statement.

Discretionary Authority: Lime Advisory has discretionary authority to manage client assets. To the best of Lime Advisory's knowledge, it is not aware of any financial condition that is reasonably likely to impair Lime Advisory's ability to meet its contractual commitments to its clients.

Bankruptcy Petition: Lime Advisory has not been the subject of a bankruptcy petition at any time during the past ten (10) years.

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FORM ADV PART 2A - APPENDIX 1

LIME ADVISORY WRAP FEE BROCHURE

Lime Advisory Corp.
One Pennsylvania Plaza, 16th Floor
New York, NY 10119 646.558.3232
www.lime.co

December 31, 2023

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ITEM 3 - WRAP FEE BROCHURE TABLE OF CONTENTS

Form ADV Part 2A – Appendix 1	13
Item 2: Summary of Material Changes	14
Item 3: Wrap Fee Brochure Table of Contents	15
Item 4: Services, Fees, and Compensation	16
Item 5: Account Requirements and Types of Clients	17
Item 6: Portfolio Manager Selection and Evaluation	18
Item 7: Client Information Provided to Portfolio Managers	21
Item 8: Client Contact with Portfolio Managers	21
Item 9: Additional Information	21
Form ADV Part 2B	25

ITEM 4 - SERVICES, FEES, AND COMENSATION

GENERAL INFORMATION

Lime Advisory offers the Lime Advisory Wrap Fee Program to prospective and current clients. Lime Advisory Corp., a corporation organized under Delaware law, is an SEC-registered investment adviser that maintains its principal office at One Pennsylvania Plaza, 16th Floor, New York, NY 10119. Lime Advisory is a sponsor of the Lime Advisory Wrap Fee Program. If you have questions regarding the material contained herein, please contact Lime Advisory at support@lime.co.

PROGRAM DESCRIPTION AND INVESTMENT STRATEGY

Lime Advisory generally offers investment advisory services over the internet. This Wrap Fee Brochure is meant to help you understand the nature of the advisory services offered by Lime Advisory, whether the advisory services offered by Lime Advisory are right for you, and the potential conflicts of interest associated with your participation in the Lime Advisory Wrap Fee Program. You should review it carefully.

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Lime Advisory's Wrap Fee Program is not designed to provide clients with a comprehensive financial plan and instead is built to advise clients on how to achieve discrete financial goals selected by the client. Lime Advisory's recommendations are highly dependent on receiving accurate information from clients. If clients provide Lime Advisory with inaccurate information or fail to update promptly the information provided to Lime Advisory when it changes, the quality and applicability of Lime Advisory's recommendations could be materially impacted.

In addition, there may be other information about a client's personal financial situation that is not elicited through Lime Advisory's online interface that could inform Lime Advisory's advice if it were provided to Lime Advisory. Similarly, not every piece of information that Lime Advisory collects is factored into your investment advice. Clients should consider this limitation on Lime Advisory's service, which is a function of Lime Advisory primarily providing an automated service.

FEES

A. Clients

Lime Advisory charges an asset-based wrap fee that covers the costs of its investment advisory services as well as associated trading and custody services provided by its affiliated broker-dealer, Lime Trading Corp. Lime Advisory's asset-based wrap fees are calculated based on client's Wrap Account Balance (as defined below) as of the close of each calendar month and charged by the first business day of each month.

Clients pay a \$3.99 per month wrap fee for their wrap accounts (\$47.88 annually). If at any point, a Client's Total Account Balance (as defined below) exceeds \$5,000, that client will pay an annualized wrap fee of 0.45% of their Wrap Account Balance instead of the \$3.99 per month fee. For any day that a Client's Total Account Balance is less than \$5,000 and that client does not otherwise qualify for the asset-based fee, they will be charged the daily equivalent of the \$3.99 monthly fee for that day. For clients with Total Account Balances around \$5,000, the monthly fee may be more than \$3.99 per month if on certain days the Total Account Balance exceeded \$5,000. "Total Account Balance" is the combined account balance of Client's Lime Advisory accounts. "Wrap Account Balance" is the account balance in Client's traditional securities accounts.

B. *Client Fee Considerations*

Clients should consider that, depending on the amount of activity in a client's account and the value of custodial, trade execution, advisory, and other services that are provided under the arrangement, the wrap fee may or may not exceed the aggregate cost of such services if they were to be provided separately or by others. The number of transactions made in clients' accounts, as well as the commissions that would be charged for each transaction at another provider, determines the relative cost of the Program versus paying for execution on a per transaction basis and paying a separate fee for advisory services. Since Lime Advisory pays the transaction charges in clients' accounts, Lime Advisory has a financial incentive to place fewer trades or trade less frequently.

Clients should also consider that Lime Advisory receives different amounts of revenue (and incurs different costs) from clients participating in each Lime Advisory service plan. Lime Advisory reserves the right, at its sole discretion, to waive portions of its fees or offer pricing that differs from its standard fees.

Lime Advisory's wrap fees are calculated based on client's Wrap Account Balance as of the close of each calendar month, and charged as of the first business day of each month.

On the last business day of the relevant period (month or quarter), Lime Advisory instructs Lime Trading Corp. to sell securities in an amount that will generate cash proceeds to satisfy a client's fee obligation. Lime Advisory will automatically debit the prorated amounts of the fees from the assets in a client's account on a monthly or quarterly, as applicable.

ITEM 5 - ACCOUNT REQUIREMENTS AND TYPES OF CLIENTS

Lime Advisory's clients include individuals, trusts, and other legal entities (subject to Lime Advisory's approval) who are U.S. residents and maintain a checking account with a U.S. bank. Lime Advisory may permit clients from other jurisdictions, however, due to regulatory requirements, additional documentation may be required. There is no minimum account size to maintain an account with the Lime Advisory plan. The minimum initial deposit is \$10. All clients execute an Advisory Agreement with Lime Advisory and a Brokerage Agreement with Lime Trading Corp.

SUMMARY

Lime Advisory provides discretionary investment management services as explained in further detail below. Client accounts are managed by Lime Advisory pursuant to each client's Advisory Agreement and the client's instructions.

PORTFOLIO STRATEGIES

Lime Advisory currently offers several investment portfolio strategies to clients, subject to limitations on availability as described below. Lime Advisory's Executive Investment Committee (the "EIC") is responsible for Lime Advisory's investment strategy, portfolio management, advice, and financial planning models, consistent with its charter and Lime Advisory's policies. The EIC determines which portfolio strategies to offer to clients directly and through Advisors and oversees each portfolio strategy, except to the extent described below.

Lime Advisory Constructed Portfolios

Lime Advisory selects the underlying securities and weightings of those securities associated with particular Allocations (as defined below). The selection process for Lime Advisory portfolios is intended to satisfy a broad set of potential client financial goals, including but not limited to maximizing returns, minimizing investment costs, limiting volatility, and diversifying investments.

Information concerning the current Lime Advisory Constructed Portfolios is available at www.limeadvisory.co.

In the future, Lime Advisory may construct additional portfolio strategies to provide more investment options to investors.

ADVICE FRAMEWORK

To use Lime Advisory's services, clients and/or their Advisors must inform Lime Advisory of their financial situation and preferences through Lime Advisory's online applications. Based on this information, Lime Advisory will recommend to clients an asset allocation for each selected portfolio strategy.

Allocation

Lime Advisory solicits input on a client's anticipated financial goals in order to recommend an allocation, which is a specific set of asset classes (i.e. stocks, and if applicable, other asset classes) and the relative distribution among those asset classes in which a client's account will be invested (the "Allocation"), or if the client does not have a financial goals input associated with the advice type (i.e. general investing), Lime Advisory allows clients to adjust an Allocation to their own risk preference. Lime Advisory determines the specific securities that compose an asset class for an Allocation, and Lime Advisory reserves the right to change the specific assets within an asset class without notice to clients as determined in good faith for the benefit of clients.

USE OF ALGORITHMS

Lime Advisory uses algorithms to advise clients and manage their accounts. These algorithms are developed, overseen, and monitored by Lime Advisory's investment advisory personnel. When a client creates a Lime Advisory account, identifies an investing goals, and selects a Lime Advisory portfolio strategy, an algorithm, developed by Lime Advisory's investment advisory personnel, determines Lime Advisory's recommended Allocation based on these inputs from the Client.

Algorithms may not perform as intended for a variety of reasons, including but not limited to incorrect assumptions, changes in the market, and/or changes to data inputs. Lime Advisory periodically modifies its algorithms, or a computer system's code or underlying assumptions, and these changes may have unintended consequences. Lime Advisory conducts testing designed to ensure that our algorithms continue to function as intended when new code is introduced, and existing code is updated. Although such testing is intended to ensure that code changes do not create unintended consequences, Clients should understand that testing, no matter how comprehensive, cannot guarantee the absence of code-related issues with our algorithms.

The algorithms described above will generate recommendations only from information that is input into the algorithm. Lime Advisory does not provide a comprehensive financial plan and although Lime Advisory collects a variety of information from clients, individualized information about every aspect of a client's personal financial situation is not elicited through Lime Advisory's online interface, and therefore, not considered by Lime Advisory's algorithms. Clients should be aware of this limitation when considering Lime Advisory's service.

TRADE EXECUTION, ACCOUNT MAINTENANCE, AND ASSET CUSTODY

In order to open a Wrap Fee Program account with Lime Advisory, clients must establish a brokerage relationship with Lime Trading Corp., an affiliated broker-dealer registered with the SEC and a member of the Financial Industry Regulatory Authority and the Securities Investor Protection Corporation. By entering into an Advisory Agreement with Lime Advisory, clients authorize and direct Lime Advisory to place all trades in their accounts through Lime Trading Corp. As such, Lime Trading Corp. will maintain all client accounts and execute all securities transactions in client accounts without separate commission costs or other fees. Lime Trading Corp. exercises no discretion in determining if and when trades are placed; it places trades only at the direction of Lime Advisory. Lime Advisory's procedures are designed to make every attempt to obtain the best execution reasonably available under the circumstances at that time, although there can be no assurance that it can be obtained. Clients should understand that the appointment of Lime Trading Corp. as the sole broker for their accounts under this Wrap Fee Program may result in disadvantages to the client as a possible result of less favorable executions than may be available through the use of a different broker-dealer.

Clients should understand the Lime Advisory Wrap Fee Program is a discretionary investment advisory program, and not a self-directed brokerage service. Unlike self-directed brokerage accounts, Lime Advisory clients do not enter individual buy and sell orders for specific securities to be executed at particular times. Rather, Lime Advisory places orders to buy and/or sell securities with Lime Trading Corp. consistent with the discretionary authority granted to it by clients, which includes, among other things, the authority to select which securities to buy and sell and when to place orders for the execution of securities. If you want to control the specific time during the day that securities are bought and sold in your account (e.g., you want the ability to "time the market"), you should not use Lime Advisory's service.

Lime Advisory trades in client accounts for any number of reasons, including in response to client actions such as asset Allocation changes, deposits, or withdrawals. Lime Advisory also trades in order to rebalance client accounts, to change investment options, or otherwise to further the investment objectives that clients specify via Lime Advisory's online interface.

Subject to Lime Advisory's trading policies, described in this section, Lime Advisory generally trades on the same business day. However, transactions will be subject to processing delays in certain circumstances. For example, orders initiated on non-business days and after markets close generally will not transact until the next business day, and halted securities will generally not transact until the exchange resumes trading in those securities.

In addition, Lime Advisory reserves the right, at any time and without notice, to delay or manage trading in response to market instability. Lime Advisory delays or manages trading when it determines it is appropriate to respond to extraordinary circumstances of market instability, as evidenced by extreme instances of elevated localized volatility (i.e., minute-to-minute spikes in implied volatility), insufficient or unstable market depth, price dislocation, incomplete execution, fast markets, rapidly widening bid-ask spreads, and halted securities (as determined by the exchange).

Lime Advisory places aggregated orders involving multiple Lime Advisory accounts trading in the same securities. In conducting these transactions no client is favored over any other client and each client that participates in an aggregated transaction will participate at the average share price for transactions in the aggregated order. Lime Advisory or its affiliates do not charge separate fees for any trade execution or custody service provided to clients.

Lime Advisory maintains a policy for addressing trade errors, through which Lime Advisory seeks to mitigate any associated harm from a trade error reasonably ascertainable at the time of mitigation to an affected client, consistent with Lime Advisory's fiduciary duty. Lime Advisory does not retain profits from correcting trade errors.

ITEM 7 - CLIENT INFORMATION PROVIDED TO PORTFOLIO MANAGERS

Because Lime Advisory manages all client portfolios directly, there are no portfolio managers with whom Lime Advisory could share client information.

ITEM 8 - CLIENT CONTACT WITH PORTFOLIO MANAGERS

Clients should consider that Lime Advisory primarily uses electronic rather than telephonic means to provide customer support. To receive customer support, clients contact Lime Advisory via email or through the online interface, and prospective clients should be comfortable communicating through those channels. Clients should be aware that Lime Advisory prioritizes requests from new clients when responding to inquiries in the customer support queue. Clients should consider that such customer support is educational in nature only, and that although the algorithms that manage client accounts are overseen, monitored, and updated by investment advisory personnel, clients participating in the Lime Advisory Digital plan will generally not interact directly with such investment advisory personnel, except as described elsewhere in this document.

ITEM 9 - ADDITIONAL INFORMATION

LIME ADVISORY'S DISCIPLINARY HISTORY

Lime Advisory has not been subject to any disciplinary events by regulators nor is it party to any legal events that are material to client evaluation of our advisory business.

LIME ADVISORY'S FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

Lime Advisory is a wholly owned subsidiary of FH Global, Inc., which is also the parent company of Lime Trading Corp., Lime Digital, LLC, Lime FinTech, LLC and Lend Academy Investments, LLC.

Lime Trading Corp., Lime Advisory's affiliate, provides custody and execution services for wrap accounts. Lime Trading Corp. is both a carrying and introducing broker registered with the Financial Industry Regulatory Authority ("FINRA") and a member of the SIPC, whose sole purpose is to service Lime Advisory's clients and carry accounts that Lime Advisory manages pursuant to discretionary authority granted to by Lime Advisory's clients. Lime Trading Corp. exercises no discretion with respect to client accounts. Lime Trading Corp. has entered into agreements with multiple clearing brokers, whereby Lime Trading Corp. instructs these clearing brokers to clear and settle Lime Advisory's clients' transactions on an omnibus basis.

Lime Digital, LLC is a money services business, but is not currently providing any such services.

Lime FinTech, LLC is a financial technology company which provides various technology products related to the securities industry.

Lend Academy Investments, LLC is an SEC registered investment advisor which provides access to certain investors in the peer-to-peer lending area. The financial offerings of Lend Academy Investments, LLC are not available through Lime Advisory, or included in any of its portfolio offerings.

LIME ADVISORY'S CODE OF ETHICS

Lime Advisory maintains a Code of Ethics designed to ensure we meet its fiduciary obligations to clients and detect and prevent violations of securities laws. Lime Advisory's Code of Ethics establishes standards of conduct for all officers and employees consistent with the code of ethics requirements of Rule 204A-1 under the Investment Advisers Act. A copy of Lime Advisory's Code of Ethics is available to clients and prospective clients upon request.

PARTICIPATION IN CLIENT TRANSACTIONS AND POTENTIAL CONFLICTS OF INTEREST

Lime Advisory or individuals associated with Lime Advisory are permitted to buy or sell securities identical to or different than those recommended to clients for their personal accounts. Individuals associated with Lime Advisory may also be Lime Advisory clients. In addition, any related person(s) may have an interest or position in certain securities which may also be recommended to a client. In such instances, Lime Advisory or its related persons may have a financial incentive to buy or sell such securities for client accounts, although this incentive is limited because Lime Advisory generally recommends highly liquid index funds to its clients and because client activity in such funds is unlikely to materially impact their price.

It is the express policy of Lime Advisory that no person employed by Lime Advisory may use material, non-public information obtained during the course of his or her work in deciding whether to purchase or sell any security prior to any pending transaction(s) being executed for an advisory account. This policy is intended to prevent employees from benefiting from transactions placed on behalf of advisory accounts.

EMPLOYEE COMPENSATION AND POTENTIAL CONFLICTS OF INTEREST

All employees are paid a base salary and certain employees are also eligible for a discretionary bonus. Discretionary bonuses are based on firm-wide targets, individual targets, or both. No compensation is based on the performance or selection of specific securities.

REVIEW OF ACCOUNTS

Lime Advisory's investment tools are designed to provide clients with continuous access to account information through Lime Advisory's online interface. Clients can utilize various tools on the interface to review their account and better understand their holdings and performance information. Clients also receive periodic emails from Lime Advisory with information about their accounts as well as links to account statements.

As described above in Item 6, Lime Advisory's algorithms continuously review clients' accounts to confirm their portfolios are within a set range of their Allocation. If a client's portfolio deviates from this range, Lime Advisory will rebalance such portfolio back to its target Allocation in certain circumstances. Lime Advisory personnel further conduct focused reviews of accounts when triggered by certain account activity, although clients should be aware that their individual accounts are generally not actively monitored directly by investment advisory personnel.

Clients are directed on a regular basis to update their information via the online interface.

CLIENT REFERRALS

Lime Advisory may offer compensation to current clients, affiliate marketers (including “bloggers”), solicitors, and other strategic partners who recommend Lime Advisory and refer new clients (collectively, “Promoters”). The compensation received by a Promoter for referring a client will depend on the amount of that client’s initial deposit and whether it is used to purchase securities or held as cash. New clients are advised of such compensation prior to opening an account. Lime Advisory supervises the referral activities of current clients and Promoters. Due to compensation from Lime Advisory, Promoters have an incentive to recommend Lime Advisory, which is a conflict of interest. Clients are not charged any fee nor do they incur any additional costs for being referred to Lime Advisory by a current client or Promoter.

TRAINING EVENTS

Periodically Lime Advisory participates in Lime Advisory hosted or third-party hosted training and educational conferences, seminars, trade shows, booth events or similar events (“Training Events”). Third parties may share in the cost of the Training Event. Additionally, third parties participate in Training Events that provide Lime Advisory and its personnel with information about their products and services. The participation and cost-sharing by third parties in Training Events could create incentives for Lime Advisory to recommend their products and services over others. Lime Advisory’s participation in Training Events is subject to its Code of Ethics and Lime Advisory does not recommend products or services of third parties based on their involvement in Training Events.

TERMINATION OF ADVISORY RELATIONSHIP

Client agreements may be canceled at any time, by either party, for any reason upon notice in accordance with the applicable Advisory Agreement. Upon termination of any account any earned, unpaid fees will be due and payable.

VOTING CLIENT SECURITIES

With respect to the Wrap Fee Program, Lime Advisory clients are set up to receive and vote all proxies and related materials for any security held in Lime Advisory accounts. Lime Advisory will not vote on proxies associated with and security for any portfolio in which it is held. Clients may request a copy of Lime Advisory’s proxy policies and procedures, which may be updated from time to time, by emailing support@lime.co.

Lime Advisory Securities earns revenue from companies that issue proxies, for facilitating the processing and delivery of the proxies to Lime Advisory’s clients.

BUSINESS DISRUPTION

There is a risk that a disaster outside of Lime Advisory’s control leads to a business disruption. Lime Advisory maintains a business continuity plan designed to allow it to maintain or resume operations as quickly as possible after a business disruption, given its scope and severity.

PRIVACY POLICY

Lime Advisory is committed to protecting its clients’ private information. Lime Advisory has instituted policies and procedures to reasonably ensure that customer information is kept private and secure. Lime Advisory does not disclose any non-public personal information about its customers or former customers to any non-affiliated third parties except as required by or permitted by law or agreed to by the client or as otherwise disclosed in Lime Advisory’s Privacy Policy. In the course of servicing a client account, Lime Advisory may share some information with its service providers, such as transfer agents, custodians, broker-dealers, accountants, and attorneys. Lime Advisory restricts internal access to non-public personal information to those employees who need access to such information in order to provide products or services to a particular client. Lime Advisory also maintains physical, electronic, and procedural safeguards to protect client information.

FINANCIAL INFORMATION

To the best of Lime Advisory's knowledge, it is not aware of any financial condition that is reasonably likely to impair Lime Advisory's ability to meet its contractual commitments to its clients.

ONLINE INTERFACE

Clients should be aware that, when Lime Advisory makes changes to its online interface, not all clients see such changes at the same time. There will typically be different services and tools available to Clients depending on the means by which they are interacting with Lime Advisory over the internet. For example, the services available on a mobile phone (or a particular mobile phone operating system) will look different or be different than the services and tools available via a web-based interface.

SUBJECT TO CHANGE

From time-to-time Lime Advisory may adjust its wrap fee program and policies. In the event of such adjustments this brochure will be modified as needed and an updated copy will be made available on the Lime Advisory website and clients will be notified via email.

FORM ADV PART 2AB

LIME ADVISORY BROCHURE SUPPLEMENT

Lime Advisory Corp.
One Pennsylvania Plaza, 16th Floor
New York, NY 10119 646.558.3232
www.lime.co
December 31, 2023

This Brochure Supplement provides information about certain Lime Advisory employees listed below that supplements the Wrap Fee Brochure you received above. If you have any questions about the contents of this brochure, please contact us at support@lime.co. Additional information about Lime Advisory is available on the SEC's website at www.adviserinfo.sec.gov.

Michael Earlywine
President and Chief Compliance Officer
Born 1964

Educational Background

Education:

MBA International Finance, Fordham University - 1996
BS Business Marketing, University of Dayton - 1987

Professional Designations

Business Background:

Dates: 01/2021 - Present
Title: President and Chief Compliance Officer
Company: Lime Advisory Corp.

Dates: 01/2021 – Present
Title: Investment Adviser Representative
Company: Lend Academy Investments, LLC

Dates: 01/2021 – Present
Title: Chief Executive Officer
Company: Lend Core, Inc. (parent company of Lend Academy Investments, LLC)

Dates: 11/2020 - Present
Title: Managing Director
Retail Strategy
Company: Lime FinTech, LLC

Dates: 09/2017 - 11/2020
Title: Senior Vice President – Channel Sales
Company: Able Noser Solution

Dates: 01/2017 - 11/2017
Title: Managing Director - Strategic Sales
Company: Riskalyze

Dates: 06/2016 - 11/2016
Title: Business Development Consultant
Company: National Stock Exchange

Dates: 11/2015 – 07/2016
Title: Equity Trading
Company: Bonwick Capital Partners, LLC

Dates: 02/2015 - 01/2016
Title: Director Capital Markets
Company: Burnham Securities

Dates: 09/2006 - 11/2014
Title: Head Trader
Company: Ecofin

Disciplinary Information

In 2017 Michael Earlywine filed for bankruptcy. The matter is currently pending.

Other Business Activities

- Michael Earlywine is a registered representative, registered with Lime Trading Corp. From time to time, he will offer clients advice or products from this activity. Clients should be aware that they may pay a commission for these services, and this may involve a possible conflict of interest, as commissionable products can conflict with the fiduciary duties of a registered investment adviser. Lime Advisory Corp. acts in the best interest of the client; including in the sale of commissionable products to advisory clients. Clients are in no way required to utilize the services any representative of Lime Advisory Corp. in such individuals outside capacity.
- Michael Earlywine is the Chief Executive Officer of Lend Core, Inc., parent company of Lend Academy Investments, LLC, a registered investment adviser doing business as “NSR Invest” and “Lending Robot,” located at One Pennsylvania Plaza, NY, NY, where he devotes approximately 60 hours per month, with 20 during regular business hours.
- Michael Earlywine is the President and Chief Compliance Officer of Lime Advisory Corp., located at One Pennsylvania Plaza, NY, NY, where he devotes approximately 160 hours per month, with all during regular business hours.
- Michael Earlywine is the Managing Director Retail Strategy for Lime FinTech, LLC, located at One Pennsylvania Plaza, NY, NY, where he devotes approximately ten hours per month, with five during regular business hours.
- Michael Earlywine maintains a capital introduction arrangement with Manitoga Investment Advisors LLC., 35 Garrison's Landing, Garrison, NY, the manager of the Manitoga Energy Income Fund. He devotes approximately two hours a month. none during regular business hours.

ITEM 5 - ADDITIONAL COMPENSATION

Michael Earlywine does not receive any economic benefit from any person, company, or organization, other than Lime Advisory Corp. in exchange for providing clients advisory services through Lime Advisory.

ITEM 6 - SUPERVISION

As the President and Chief Compliance Officer of Lime Advisory, Michael Earlywine supervises all activities of the firm. Michael Earlywine's contact information is on the cover page of this disclosure document. Michael Earlywine adheres to applicable regulatory requirements, together with all policies and procedures outlined in the firm's code of ethics and compliance manual.