

# **Return on Investment, LLC**

## **Form ADV Part 2A – Disclosure Brochure**

**Effective: March 16, 2023**

This Form ADV 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of Return on Investment, LLC (“ROI” or the “Advisor”). If you have any questions about the content of this Disclosure Brochure, please contact the Advisor at (307) 314 - 3211.

ROI is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). The information in this Disclosure Brochure has not been approved or verified by the SEC or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information about ROI to assist you in determining whether to retain the Advisor.

Additional information about ROI and its Advisory Persons is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor’s firm name or CRD# 299979.

**Return on Investment, LLC  
Afton, WY 83110  
Phone: (307) 314-3211**

## Item 2 – Material Changes

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Form ADV 2 is divided into two parts: *Part 2A (the "Disclosure Brochure")* and *Part 2B (the "Brochure Supplement")*. The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about Advisory Persons of ROI.

ROI believes that communication and transparency are the foundation of its relationship with clients and will continually strive to provide you with complete and accurate information at all times. ROI encourages all current and prospective clients to read this Disclosure Brochure and discuss any questions you may have with the Advisor.

### Material Changes

The following material changes have been made to this Disclosure Brochure since the last annual amendment filing:

- The Advisor no longer offers financial planning services.
- The Advisor has amended its fees for investment management services. Please see Item 5 for additional information.
- The Advisor's primary phone number is (307) 314-3211.

### Future Changes

From time to time, the Advisor may amend this Disclosure Brochure to reflect changes in business practices, changes in regulations or routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to you annually and if a material change occurs in the business practices of ROI.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor's firm name or CRD #299979. You may also request a copy of this Disclosure Brochure at any time, by contacting the Advisor at (307) 314-3211.

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## **Item 4 – Advisory Services**

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### **A. Firm Information**

Return on Investment, LLC (“ROI” or the “Advisor”) is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). The Advisor is organized as a limited liability company under the laws of the State of Wyoming, effective April 2021. Previously, the Advisor was organized as a limited liability company under the laws of the State of California. ROI was a registered investment advisor from August 2009 through November 2014. ROI became registered again as an investment advisor in February 2019. ROI is owned and operated by William R. DuBois (Managing Member and Chief Compliance Officer). This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by ROI.

### **B. Advisory Services Offered**

ROI offers investment advisory services to institutional clients such as trusts, and investment holding companies (each referred to as a “Client”).

The Advisor serves as a fiduciary to Clients, as defined under the applicable laws and regulations. As a fiduciary, the Advisor upholds a duty of loyalty, fairness and good faith towards each Client and seeks to mitigate potential conflicts of interest. ROI’s fiduciary commitment is further described in the Advisor’s Code of Ethics. For more information regarding our Code of Ethics, please see Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.

#### Investment Management Services

ROI provides customized investment advisory solutions for its Clients. This is achieved through continuous personal Client contact and interaction while providing non-discretionary investment management and related advisory services. ROI works with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to create an investment strategy. ROI will then construct an investment portfolio, consisting of low-cost, diversified mutual funds, exchange-traded funds (“ETFs”), unit investment trusts and alternative investments to achieve the Client’s investment goals. The Advisor may also utilize individual stocks and bonds to meet the needs of its Clients. The Advisor may retain certain types of investments based on a Client’s legacy investments based on portfolio fit and/or tax considerations.

ROI’s investment approach is primarily long-term focused, but the Advisor may buy, sell or re-allocate investments that have been held for less than one year to meet the objectives of the Client or due to market conditions. ROI will construct, implement and monitor the portfolio to ensure it meets the goals, objectives, circumstances, and risk tolerance agreed to by the Client. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to acceptance by the Advisor.

ROI evaluates and selects investments for inclusion in Client portfolios only after applying its internal due diligence process. ROI may recommend, on occasion, redistributing investment allocations to diversify the portfolio. ROI may recommend specific positions to increase sector or asset class weightings. ROI may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position[s] in the portfolio, change in risk tolerance of the Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client’s risk tolerance.

At no time will ROI accept or maintain custody of a Client’s funds or securities, except for the limited authority as outlined in Item 15 – Custody. All Client assets will be managed within the designated account[s] at the Custodian, pursuant to the terms of the advisory agreement. Please see Item 12 – Brokerage Practices.

### **C. Client Account Management**

Prior to engaging ROI to provide investment advisory services, each Client is required to enter into one or more advisory agreements with the Advisor that define the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

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- Establishing an Investment Strategy – ROI, in connection with the Client, will develop a strategy targeted to achieve the Client's goals and objectives.
- Asset Allocation – ROI will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation and tolerance for risk for each Client.
- Portfolio Construction – ROI will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – ROI will provide investment management and ongoing oversight of the Client's portfolio.

#### **D. Wrap Fee Programs**

ROI does not manage or place Client assets into a wrap fee program. Investment management services are provided directly by ROI.

#### **E. Assets Under Management**

As of December 31, 2022, ROI manages approximately \$747,000,000 in Client assets, all of which are on a non-discretionary basis. Clients may request more current information at any time by contacting the Advisor.

### **Item 5 – Fees and Compensation**

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The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client shall sign one or more agreements that detail the responsibilities of ROI and the Client.

#### **A. Fees for Advisory Services**

##### Investment Management Services

Investment advisory fees are paid quarterly, at the end of each calendar quarter, pursuant to the terms of the investment advisory agreement. The Advisor charges a fixed annual fee for investment management services that will not exceed 0.50% and is determined on a case-by-case basis. The minimum annual fee per client is \$12,000 for investment management services.

Due to the detailed nature of the work the Advisor does for Clients, fees for investment management services will vary depending on the scope and complexity of the services to be provided. As such, fees may be lower or higher than those charged by other investment advisors for similar investment management services. Fees may be negotiable at the sole discretion of the Advisor. Material changes in a Client's situation may result in a change in the Advisor's fee. Throughout the relationship, it is anticipated that the Advisor will periodically review the fixed-fee for each Client and update it to remain commensurate with factors such as, the Client's financial situation, level of investable assets, and estimated time involved. The Client will be notified of any fee changes in writing, and if the result is a fee increase it must be acknowledged by the Client in writing before taking effect.

The investment advisory fee in the first quarter of service is prorated from the inception date of the account[s] to the end of the first quarter. All securities held in accounts managed by ROI will be independently valued by the Custodian. ROI will conduct periodic reviews of the Custodian's valuations.

The Advisor's fee is exclusive of, and in addition to any applicable securities transaction and custody fees, and other related costs and expenses described in Item 5.C below, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs.

#### **B. Fee Billing**

##### Investment Management Services

The Advisor shall send an invoice to the Client at the respective quarter-end date indicating the amount of the fees that are owed.

### **C. Other Fees and Expenses**

Clients may incur certain fees or charges imposed by third parties, other than ROI, in connection with investments made on behalf of the Client's account[s]. The Client is responsible for all custody and applicable securities execution fees charged by the Custodian. The investment advisory fee charged by ROI is separate and distinct from these custody and execution fees.

In addition, all fees paid to ROI for investment advisory services are separate and distinct from the expenses charged by mutual funds and ETFs to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client may be able to invest in these products directly, without the services of ROI, but would not receive the services provided by ROI which are designed, among other things, to assist the Client in determining which products or services are most appropriate for each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by ROI to fully understand the total fees to be paid. Please refer to Item 12 – Brokerage Practices for additional information.

### **D. Advance Payment of Fees and Termination**

#### Investment Management Services

ROI is compensated for its services at the end of the quarter after investment advisory services are rendered. Either party may terminate the investment advisory agreement, at any time, by providing advance written notice to the other party. The Client may also terminate the investment advisory agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. The Client's investment advisory agreement with the Advisor is non-transferable without the Client's prior consent.

### **E. Compensation for Sales of Securities**

ROI does not buy or sell securities to earn commissions and does not receive any compensation for securities transactions in any Client account, other than the investment advisory fees noted above.

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

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ROI does not charge performance-based fees for its investment advisory services. The fees charged by ROI are as described in Item 5 above. and are not based upon the capital appreciation of the funds or securities held by any Client.

ROI does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

### **Item 7 – Types of Clients**

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ROI offers investment advisory services to institutional clients such as trusts, and investment holding companies. ROI does not impose a minimum account or relationship size.

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

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#### **A. Methods of Analysis**

ROI generally works with clients who have long-term growth objectives over multi-generational time horizons. ROI works with its clients to construct investment strategies that match their profiles. These strategies will have meaningful allocations to equities, often through mutual funds, ETFs, unit trusts, limited partnerships and other pooled investment vehicles. ROI performs research and due diligence on the asset class, investment strategy, policies, processes, controls, governance, leadership and team members of the funds.

ROI continuously monitors these investments and evaluates them on their own merits and compares them to peers and other alternatives. Research and analysis from ROI is derived from numerous sources, including financial media companies, third-party research materials, Internet sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others.

ROI utilizes economic indicators, business indicators and other performance metrics to analyze ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are an attractive and appropriate investment. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

## **B. Risk of Loss**

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. ROI will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

While the methods of analysis help the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in these methods of analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process.

The following are some of the risks associated the Advisor's approach:

### Market Risks

The value of a Client's holdings may fluctuate in response to events specific to companies or markets, as well as economic, political, or social events in the U.S. and abroad. This risk is linked to the performance of the overall financial markets.

### ETF Risks

The performance of ETFs is subject to market risk, including the possible loss of principal. The price of the ETFs will fluctuate with the price of the underlying securities that make up the funds. In addition, ETFs have a trading risk based on the loss of cost efficiency if the ETFs are traded actively and a liquidity risk if the ETFs has a large bid-ask spread and low trading volume. The price of an ETF fluctuates based upon the market movements and may dissociate from the index being tracked by the ETF or the price of the underlying investments. An ETF purchased or sold at one point in the day may have a different price than the same ETF purchased or sold a short time later.

### Mutual Fund Risks

The performance of mutual funds is subject to market risk, including the possible loss of principal. The price of the mutual funds will fluctuate with the value of the underlying securities that make up the funds. The price of a mutual fund is typically set daily therefore a mutual fund purchased at one point in the day will typically have the same price as a mutual fund purchased later that same day.

### Alternative Investments (Limited Partnerships)

The performance of alternative investments (limited partnerships) can be volatile and may have limited liquidity. An investor could lose all or a portion of their investment. Such investments often have concentrated positions and investments that may carry higher risks. Client should only have a portion of their assets in these investments.

### Minority Equity Stakes in Private Companies

The performance of minority equity stakes in private companies can be volatile and may have limited liquidity. An investor could lose all or a portion of their investment. Such investments are concentrated positions and may carry higher risks. Clients should only invest in businesses and industries within their sphere of competence and experience and they should only invest a portion of their assets in these investments.

**Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.**

## **Item 9 – Disciplinary Information**

**There are no legal, regulatory or disciplinary events involving ROI or Mr. DuBois.** ROI values the trust Clients place in the Advisor. The Advisor encourages Clients to perform the requisite due diligence on any advisor or service provider that the Client engages. The backgrounds of the Advisor and its Advisory Persons are available on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor's firm name or CRD# 299979.

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

The sole business of ROI and Mr. DuBois is to provide investment advisory services to its Clients. ROI does not maintain any affiliations with other firms, other than contracted service providers to assist with the servicing of its Client's accounts.

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

### **A. Code of Ethics**

ROI has implemented a Code of Ethics (the "Code") that defines the Advisor's fiduciary commitment to each Client. This Code applies to all persons associated with ROI ("Supervised Persons"). The Code was developed to provide general ethical guidelines and specific instructions regarding the Advisor's duties to each Client. ROI and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of ROI's Supervised Persons to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code covers a range of topics that address employee ethics and conflicts of interest. To request a copy of our Code, please contact the Advisor at (307) 314-3211.

### **B. Personal Trading with Material Interest**

ROI's Supervised Persons do not purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. ROI does not act as principal in any transactions. In addition, the Advisor does not act as the general partner of a fund, or advise an investment company. ROI does not have a material interest in any securities traded in Client accounts.

### **C. Personal Trading in Same Securities as Clients**

ROI's Supervised Persons do not purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. As noted above, the Advisor has adopted the Code to address insider trading

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(material non-public information controls); gifts and entertainment; outside business activities and personal securities reporting. ROI conducts a coordinated review of personal accounts and the accounts of the Clients to ensure there is no transaction to the detriment of any Client. The Advisor has also adopted written policies and procedures to detect the misuse of material, non-public information.

#### **D. Personal Trading at Same Time as Client**

ROI's Supervised Persons do not purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. **At no time will ROI, or any Supervised Person of ROI, transact in any security to the detriment of any Client.**

### **Item 12 – Brokerage Practices**

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#### **A. Recommendation of Custodian[s]**

ROI does not have discretionary authority to select the broker-dealer/custodian for custody and execution services. The Client will engage the broker-dealer/custodian (herein the "Custodian") to safeguard Client assets and authorize ROI to direct trades to the Custodian as agreed upon in the investment advisory agreement. Further, ROI does not have the discretionary authority to negotiate commissions on behalf of Clients on a trade-by-trade basis.

Where ROI does not exercise discretion over the selection of the Custodian, it may recommend the Custodian to Clients for custody and execution services. Clients are not obligated to use the Custodian recommended by the Advisor and will not incur any extra fee or cost associated with using a custodian not recommended by ROI. However, the Advisor may be limited in the services it can provide if the recommended Custodian is not engaged. ROI may recommend the Custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, and its reputation and/or the location of the Custodian's offices.

Following are additional details regarding the brokerage practices of the Advisor:

**1. Soft Dollars** - Soft dollars are revenue programs offered by broker-dealers/custodians whereby an advisor enters into an agreement to place security trades with the broker in exchange for research and other services. **ROI does not participate in soft dollar programs sponsored or offered by any broker-dealer/custodian.**

**2. Brokerage Referrals** - ROI does not receive any compensation from any third party in connection with the recommendation for establishing an account.

**3. Directed Brokerage** - All Clients are serviced on a "directed brokerage basis", where ROI will place trades within the established account[s] at the Custodian designated by the Client. Further, all Client accounts are traded within their respective account[s]. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor's own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client's account[s]). ROI will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the Custodian.

#### **B. Aggregating and Allocating Trades**

Although ROI does not aggregate or "batch" trades, the primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of the order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the Custodian. ROI will execute each transaction through the Custodian designated by the Client. ROI will seek to execute securities transactions by the close of each business day and will be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage any particular Client accounts.

## **Item 13 – Review of Accounts**

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### **A. Frequency of Reviews**

Securities in Client accounts are monitored on a regular and continuous basis by Mr. DuBois. Formal reviews are generally conducted at least annually or more or less frequently depending on the needs of the Client.

### **B. Causes for Reviews**

In addition to the investment monitoring noted in Item 13.A., each Client account shall be reviewed at least annually. Reviews may be conducted more or less frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account. The Client is encouraged to notify ROI if changes occur in the Client's personal financial situation that might adversely affect the Client's investment plan. Additional reviews may be triggered by material market, economic or political events.

### **C. Review Reports**

The Client will receive account statements no less than quarterly from the Custodian. These account statements are sent directly from the Custodian to the Client. The Client may also establish electronic access to the Custodian's website so that the Client may view these reports and their account activity. Client account statements will include all positions, transactions and fees relating to the Client's account[s]. The Advisor may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

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

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### **A. Compensation Received by ROI**

ROI is a fee-based advisory firm, that is compensated solely by its Clients and not from any investment product. ROI does not receive commissions or other compensation from product sponsors, broker-dealers or any un-related third party. ROI may refer Clients to various unaffiliated, non-advisory professionals (e.g. attorneys, accountants, estate planners) to provide certain financial services necessary to meet the goals of its Clients. Likewise, ROI may receive non-compensated referrals of new Clients from various third-parties.

### **B. Compensation from Client Referrals**

The Advisor does not compensate, either directly or indirectly, any persons who are not supervised persons, for Client referrals.

## **Item 15 – Custody**

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ROI does not accept or maintain custody of any Client accounts. All Clients must place their assets with a "qualified custodian". Clients are required to engage the Custodian to retain their funds and securities and direct ROI to utilize that Custodian for the Client's security transactions. ROI encourages Clients to review statements provided by the account Custodian to ensure accuracy, as the Custodian does not perform this review. For more information about custodians and brokerage practices, see Item 12 – Brokerage Practices.

## **Item 16 – Investment Discretion**

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ROI does not have discretion over the selection and amount of securities to be bought or sold in Client accounts.

## **Item 17 – Voting Client Securities**

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Although ROI does not receive Client proxy ballots, ROI does provide proxy voting recommendations to Clients in accordance with ROI's proxy voting policies and procedures. Clients retain the responsibility to submit their proxy voting ballots and reserve the right to override ROI's recommendations and direct their voting as they determine. Clients may obtain a copy of ROI's proxy voting policies and procedures upon request.

## Item 18 – Financial Information

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Neither ROI, nor Mr. DuBois, have any adverse financial situations that would reasonably impair the ability of ROI to meet all obligations to its Clients. Neither ROI, nor Mr. DuBois have been subject to a bankruptcy or financial compromise. ROI is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect fees of \$1,200 or more for services to be performed six months or more in advance.

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## Privacy Policy

Effective Date: March 16, 2023

### Our Commitment to You

Return on Investment, LLC ("ROI" or the "Advisor") is committed to safeguarding the use of personal information of our Clients (also referred to as "you" and "your") that we obtain as your Investment Advisor, as described here in our Privacy Policy ("Policy").

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. ROI (also referred to as "we", "our" and "us") protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

ROI does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Policy.

### Why you need to know?

Registered Investment Advisors ("RIAs") must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

### What information do we collect from you?

Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number[s]	Income and expenses
E-mail address[es]	Investment activity
Account information (including other institutions)	Investment experience and goals

### What Information do we collect from other sources?

Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

### How do we protect your information?

To safeguard your personal information from unauthorized access and use we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client's personal information.

We require third parties that assist in providing our services to you to protect the personal information they receive from us.

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### How do we share your information?

An RIA shares Client personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Do we share?	Can you limit?
<b>Servicing our Clients</b> We may share non-public personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting.	Yes	No
<b>Marketing Purposes</b> ROI does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where ROI or the client has a formal agreement with the financial institution. <b>We will only share information for purposes of servicing your accounts, not for marketing purposes.</b>	No	Not Shared
<b>Authorized Users</b> Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent[s] or representative[s].	Yes	Yes
<b>Information About Former Clients</b> ROI does not disclose and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our Clients.	No	Not Shared

### Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise this Policy, and will provide you with a revised policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

### Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (307) 314-3211.