



209 Shaw St  
Mechanicsburg, Pennsylvania 17050

<https://www.ando-arashi.com/>

## **Form ADV Part 2A Ando Arashi Client Brochure**

**August 6, 2023**

### **Item 1 Cover Page**

This brochure (“Brochure”) provides information about the qualifications and business practices of Ando Arashi LLC (“Ando Arashi”), an investment adviser registered with the Pennsylvania Department of Banking and Securities (PA DOBS). Registration does not imply a certain level of skill or training but only indicates that Ando Arashi has registered its business with state authorities. The information in this Brochure has not been approved or verified by the SEC or by any state securities authority.

If you have any questions about the contents of this Brochure, please contact us at 717-280-8008 or [hello@ando-arashi.com](mailto:hello@ando-arashi.com). Additional information about Ando Arashi is also available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) and on Ando Arashi’s website, <https://www.ando-arashi.com/> (the “Site”).

## **Item 2 Material Changes**

This brochure was initially published in April 2023.

The brochure was updated in July and August 2023 after consultation with PA DOBs regulators.

Specifically,

### Item 4: Advisory Business

Advisory services were clarified and explained in better detail

### Item 5: Fees and Compensation

Advisory fees were clarified and explained in better detail

### Item 15: Custody

Custody policy was clarified and explained in better detail

### Item 16: Investment Discretion

Discretion policy was clarified and explained in better detail

### Item 19: Requirements for State-Registered Advisers

Section Added

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## **Item 4 Advisory Business**

### **Description of Advisory Firm**

Ando Arashi LLC (hereinafter referred to as “Ando Arashi”, “we”, “firm”, “Advisor”, and “us”) is registered as an Investment Adviser with PA DOBS. We are a limited liability company founded in March of 2022. Andrew and Ai Haley are the principal owners of Ando Arashi.

### **Types of Advisory Services**

#### One Time Financial Health Checkup

This is a one-time, one-hour Zoom call, with no future advisory service obligations.

Given the limited time available, we will only be able to cover a limited number of topics, such as

- Saving for Retirement
- Saving for a Child’s Education
- Starting a business
- Other Miscellaneous Client requests

#### Ongoing Comprehensive Financial Planning

Financial planning involves an evaluation of a Client’s current and future financial state by using currently known variables to predict future cash flows, asset values, and withdrawal plans. The key defining aspect of financial planning is that through the financial planning process, all questions, information, and analysis will be considered as they affect and are affected by the entire financial and life situation of the Client. The Client will receive a detailed financial plan designed to achieve his or her stated financial goals and objectives. The Client and advisor will work together to select specific areas to cover. These areas may include, but are not limited to, the following:

- **Business Planning:** We provide consulting services for Clients who currently operate their own business, are considering starting a business, or are planning for an exit from their current business. Under this type of engagement, we work with you to assess your current situation, identify your objectives, and develop a plan aimed at achieving your goals.
- **Cash Flow and Debt Management:** We will conduct a review of your income and expenses to determine your current surplus or deficit along with advice on

prioritizing how any surplus should be used or how to reduce expenses if they exceed your income. Advice may also be provided on which debts to pay off first based on factors such as the interest rate of the debt and any income tax ramifications. We may also recommend what we believe to be an appropriate cash reserve that should be considered for emergencies and other financial goals, along with a review of accounts (such as money market funds) for such reserves, plus strategies to save desired amounts.

- College Savings: Includes projecting the amount that will be needed to achieve college or other post-secondary education funding goals, along with advice on ways for you to save the desired amount. Recommendations as to savings strategies are included, and, if needed, we will review your financial picture as it relates to eligibility for financial aid or the best way to contribute to grandchildren (if appropriate).
- Employee Benefits Optimization: We will provide review and analysis as to whether you, as an employee, are taking the maximum advantage possible of your employee benefits. If you are a business owner, we will consider and/or recommend the various benefit programs that can be structured to meet both business and personal retirement goals.
- Estate Planning: This usually includes an analysis of your exposure to estate taxes and your current estate plan, which may include whether you have a will, powers of attorney, trusts, and other related documents. Our advice also typically includes ways for you to minimize or avoid future estate taxes by implementing appropriate estate planning strategies such as the use of applicable trusts. We always recommend that you consult with a qualified attorney when you initiate, update, or complete estate planning activities. We may provide you with contact information for attorneys who specialize in estate planning when you wish to hire an attorney for such purposes. From time to time, we will participate in meetings or phone calls between you and your attorney with your approval or request.
- Financial Goals: We will help Clients identify financial goals and develop a plan to reach them. We will identify what you plan to accomplish, what resources you will need to make it happen, how much time you will need to reach the goal, and how much you should budget for your goal.
- Insurance: Review of existing policies to ensure proper coverage for life, health, disability, long term care, liability, home, and automobile.
- Investment Analysis: This may involve developing an asset allocation strategy to meet Clients' financial goals and risk tolerance, providing information on investment vehicles and strategies, and reviewing employee stock options. The strategies and types of investments we may recommend are further discussed in Item 8 of this brochure.
- Retirement Planning: Our retirement planning services typically include projections of your likelihood of achieving your financial goals, typically focusing on financial independence as the primary objective. For situations where

projections show less than the desired results, we may make recommendations, including those that may impact the original projections by adjusting certain variables (e.g., working longer, saving more, spending less, taking more risk with investments). If you are near retirement or already retired, advice may be given on appropriate distribution strategies to minimize the likelihood of running out of money or having to adversely alter spending during your retirement years.

- **Risk Management:** A risk management review includes an analysis of your exposure to major risks that could have a significant adverse impact on your financial picture, such as premature death, disability, property and casualty losses, or the need for long-term care planning. Advice may be provided on ways to minimize such risks and about weighing the costs of purchasing insurance versus the benefits of doing so and, likewise, the potential cost of not purchasing insurance (“self-insuring”).
- **Tax Planning Strategies:** Advice may include ways to minimize current and future income taxes as a part of your overall financial planning picture. For example, we may make recommendations on which type of account(s) or specific investments should be owned based in part on their “tax efficiency,” with the consideration that there is always a possibility of future changes to federal, state or local tax laws and rates that may impact your situation. We recommend that you consult with a qualified tax professional before initiating any tax planning strategy, and we may provide you with contact information for accountants or attorneys who specialize in this area if you wish to hire someone for such purposes. We will participate in meetings or phone calls between you and your tax professional with your approval.

### **Client Tailored Services and Client Imposed Restrictions**

We offer the same suite of services to all our Clients. However, specific Client financial plans and their implementation are dependent upon the Client Investment Policy Statement which outlines each Client’s current situation (income, tax levels, and risk tolerance levels) and is used to construct a Client specific plan to aid in the selection of a portfolio that matches restrictions, needs, and targets.

**Wrap Fee Programs**

We do not participate in wrap fee programs.

**Assets under Management**

Ando Arashi has \$0 in discretionary and \$0 in non-discretionary assets under management as of December 31, 2022.

## Item 5 Fees and Compensation

Please note, unless a Client has received this Brochure at least 48 hours prior to signing a financial planning agreement (“Client Agreement”), the Client Agreement may be terminated by the Client within five (5) business days of signing the Client Agreement without penalty and without incurring any fees. How we are paid depends on the type of advisory service we are performing. Please review the fee and compensation information below.

### One Time Financial Checkup

Clients pay for our financial checkup as a one-time fee, paid in advance via our website. In the event of non-performance of the checkup call, clients may obtain a full refund of the fee via email request to [hello@ando-arashi.com](mailto:hello@ando-arashi.com)

The One Time Financial Checkup Agreement will terminate automatically upon completion by Ando Arashi LLC of the One Time Financial Health Checkup Zoom Call

Service	Upfront Fee	Ongoing Fees (Annual)	
		Financial Planning	Investment Management
<b>One Time Financial Checkup</b>	\$99	N/A	N/A

### Ongoing Comprehensive Financial Planning

Clients pay for our comprehensive financial planning fees on a fixed annual fee, billed monthly in arrears. Ongoing Comprehensive Financial Planning includes financial planning services as described in Item 4 of this Brochure.

Service	Upfront Fee	Ongoing Fees (Annual)	
		Financial Planning	Investment Management
<b>Ongoing Financial Planning</b>	\$0-750	\$5,400	N/A



Fees are based on complexity and needs of the Client, and may be negotiable in certain cases. Accounts initiated or terminated during a billing period will be charged a prorated fee based on the amount of time remaining in the billing period. Ongoing Advisory fees are paid via electronic invoice with debit/credit card/PayPal. An Ongoing Comprehensive Financial Planning Client Agreement may be terminated with written notice at least 30 calendar days in advance. Since fees are paid in arrears, no refund will be required upon termination of the Client Agreement.

When an upfront fee is charged, the upfront fee is for Client onboarding, data gathering, and setting the basis for the financial plan. This work will commence immediately after the fee is paid and will be completed within the first 30 days of the date the fee is paid, provided all relevant information is provided to us in a timely manner. In the event of non-performance of the upfront fee, clients may obtain a full refund of the fee via email request to [hello@ando-arashi.com](mailto:hello@ando-arashi.com)

At no time will Ando Arashi bill an amount above \$500 more than 6 months in advance.

### **Other Types of Fees and Expenses**

Our fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which may be incurred by the Client. Clients may incur certain charges imposed by custodians, brokers, and other third parties such as custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer, and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual fund and exchange-traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees, and commissions are exclusive of and in addition to our fee, and we shall not receive any portion of these commissions, fees, and costs.

We do not accept compensation for the sale of securities or other investment products including asset-based sales charges or service fees from the sale of mutual funds.

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

Ando Arashi does not charge performance-based fees. Clients are only charged an annual advisory fee as disclosed in Item 5 above.

## **Item 7 Types of Clients**

We provide financial planning to individuals and high net-worth individuals.

There is no minimum account size requirement when engaging us for Financial Planning Services.

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

Our primary methods of investment analysis are Fundamental, Technical, Charting, and Cyclical analysis.

Fundamental analysis involves analyzing individual companies and their industry groups, such as a company's financial statements, details regarding the company's product line, the experience, and expertise of the company's management, and the outlook for the company's industry. The resulting data is used to measure the true value of the company's stock compared to the current market value. The risk of fundamental analysis is that the information obtained may be incorrect and the analysis may not provide an accurate estimate of earnings, which may be the basis for a stock's value. If securities prices adjust rapidly to new information, utilizing fundamental analysis may not result in favorable performance.

Technical analysis involves using chart patterns, momentum, volume, and relative strength to pick sectors that may outperform market indices. However, there is no assurance of accurate forecasts or that trends will develop in the markets we follow. In the past, there have been periods without discernible trends and similar periods will presumably occur in the future. Even where major trends develop, outside factors like government intervention could potentially shorten them.

Furthermore, one limitation of technical analysis is that it requires price movement data, which can translate into price trends sufficient to dictate a market entry or exit decision. In a trendless or erratic market, a technical method may fail to identify trends requiring action. In addition, technical methods may overreact to minor price movements, establishing positions contrary to overall price trends, which may result in losses. Finally, a technical trading method may underperform other trading methods when fundamental factors dominate price moves within a given market.

Cyclical analysis is a type of technical analysis that involves evaluating recurring price patterns and trends based upon business cycles. Economic/business cycles may not be predictable and may have many fluctuations between long-term expansions and contractions. The lengths of economic cycles may be difficult to predict with accuracy and therefore the risk of cyclical analysis is the difficulty in predicting economic trends and consequently the changing value of securities that would be affected by these changing trends.

Charting analysis involves the gathering and processing of price and volume information for a particular security. This price and volume information is analyzed using mathematical equations. The resulting data is then applied to graphing charts, which is used to predict future price movements based on price patterns and trends. Charts may not

accurately predict future price movements. Current prices of securities may not reflect all information about the security and day-to-day changes in market prices of securities may follow random patterns and may not be predictable with any reliable degree of accuracy.

## **Modern Portfolio Theory**

The underlying principles of MPT are:

- Investors are risk averse. The only acceptable risk is that which is adequately compensated by an expected return. Risk and investment return are related and an increase in risk requires an increased expected return.
- Markets are efficient. The same market information is available to all investors at the same time. The market prices every security fairly based upon this equal availability of information.

The complete design of the portfolio is more important than the selection of any particular security. The appropriate allocation of capital among asset classes will have far more influence on long-term portfolio performance than the selection of individual securities.

Investing for the long-term (preferably longer than ten years) becomes critical to investment success because it allows the long-term characteristics of the asset classes to surface.

Increasing diversification of the portfolio with lower correlated asset class positions can decrease portfolio risk. Correlation is the statistical term for the extent to which two asset classes move in tandem or opposition to one another.

## **Passive Investment Management**

When appropriate, we practice passive investment management. Passive investing involves building portfolios that are composed of various distinct asset classes. The asset classes are weighted in a manner to achieve the desired relationship between correlation, risk, and return. Funds that passively capture the returns of the desired asset classes are placed in the portfolio. The funds that are used to build passive portfolios are typically index mutual funds or exchange-traded funds.

Passive investment management is characterized by low portfolio expenses (i.e. the funds inside the portfolio have low internal costs), minimal trading costs (due to infrequent trading activity), and relative tax efficiency (because the funds inside the portfolio are tax efficient and turnover inside the portfolio is minimal).

In contrast, active management involves a single manager or managers who employ some method, strategy, or technique to construct a portfolio that is intended to generate returns that are greater than the broader market or a designated benchmark.

## **Material Risks Involved**

All investing strategies we offer involve risk and may result in a loss of your original investment which you should be prepared to bear. Many of these risks apply equally to stocks, bonds, commodities, and any other investment or security. Material risks associated with our investment strategies are listed below.

- **Market Risk:** Market risk involves the possibility that an investment's current market value will fall because of a general market decline, reducing the value of the investment regardless of the operational success of the issuer's operations or its financial condition.
- **Strategy Risk:** The Adviser's investment strategies and/or investment techniques may not work as intended.
- **Small and Medium Cap Company Risk:** Securities of companies with small and medium market capitalizations are often more volatile and less liquid than investments in larger companies. Small and medium cap companies may face a greater risk of business failure, which could increase the volatility of the Client's portfolio.
- **Turnover Risk:** At times, the strategy may have a portfolio turnover rate that is higher than other strategies. A high portfolio turnover would result in correspondingly greater brokerage commission expenses and may result in the distribution of additional capital gains for tax purposes. These factors may negatively affect the account's performance.
- **Limited markets:** Certain securities may be less liquid (harder to sell or buy) and their prices may at times be more volatile than at other times. Under certain market conditions, we may be unable to sell or liquidate investments at prices we consider reasonable or favorable or find buyers at any price.
- **Concentration Risk:** Certain investment strategies focus on particular asset-classes, industries, sectors or types of investment. From time to time these strategies may be subject to greater risks of adverse developments in such areas of focus than a strategy that is more broadly diversified across a wider variety of investments.
- **Interest Rate Risk:** Bond (fixed income) prices generally fall when interest rates rise, and the value may fall below par value or the principal investment. The opposite is also generally true: bond prices generally rise when interest rates fall. In general, fixed income securities with longer maturities are more sensitive to these price changes. Most other investments are also sensitive to the level and direction of interest rates.

- Legal or Legislative Risk: Legislative changes or Court rulings may impact the value of investments, or the securities' claim on the issuer's assets and finances.
- Inflation: Inflation may erode the buying power of your investment portfolio, even if the dollar value of your investments remains the same.

## **Risks Associated with Securities**

Apart from the general risks outlined above which apply to all types of investments, specific securities may have other risks.

- Commercial Paper is, in most cases, an unsecured promissory note that is issued with a maturity of 270 days or less. Being unsecured the risk to the investor is that the issuer may default.
- Common stocks may go up and down in price quite dramatically, and in the event of an issuer's bankruptcy or restructuring could lose all value. A slower-growth or recessionary economic environment could have an adverse effect on the price of all stocks.
- Corporate Bonds are debt securities to borrow money. Generally, issuers pay investors periodic interest and repay the amount borrowed either periodically during the life of the security and/or at maturity. Alternatively, investors can purchase other debt securities, such as zero coupon bonds, which do not pay current interest, but rather are priced at a discount from their face values and their values accrete over time to face value at maturity. The market prices of debt securities fluctuate depending on factors such as interest rates, credit quality, and maturity. In general, market prices of debt securities decline when interest rates rise and increase when interest rates fall. The longer the time to a bond's maturity, the greater its interest rate risk.
- Bank Obligations including bonds and certificates of deposit may be vulnerable to setbacks or panics in the banking industry. Banks and other financial institutions are greatly affected by interest rates and may be adversely affected by downturns in the U.S. and foreign economies or changes in banking regulations.
- Municipal Bonds are debt obligations generally issued to obtain funds for various public purposes, including the construction of public facilities. Municipal bonds pay a lower rate of return than most other types of bonds. However, because of a municipal bond's tax-favored status, investors should compare the relative after-tax return to the after-tax return of other bonds, depending on the investor's tax bracket. Investing in municipal bonds carries the same general risks as investing in bonds in general. Those risks include interest rate risk, reinvestment risk, inflation risk, market risk, call or redemption risk, credit risk, and liquidity and valuation risk.
- Options and other derivatives carry many unique risks, including time-sensitivity, and can result in the complete loss of principal. While covered call writing does

provide a partial hedge to the stock against which the call is written, the hedge is limited to the amount of cash flow received when writing the option. When selling covered calls, there is a risk the underlying position may be called away at a price lower than the current market price.

- Exchange Traded Funds prices may vary significantly from the Net Asset Value due to market conditions. Certain Exchange Traded Funds may not track underlying benchmarks as expected. ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net asset value; (ii) the ETF may employ an investment strategy that utilizes high leverage ratios; or (iii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are de-listed from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. The Adviser has no control over the risks taken by the underlying funds in which the Clients invest.
- Mutual Funds: When a Client invests in open-end mutual funds or ETFs, the Client indirectly bears its proportionate share of any fees and expenses payable directly by those funds. Therefore, the Client will incur higher expenses, many of which may be duplicative. In addition, the Client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives).

## **Item 9 Disciplinary Information**

Ando Arashi and its management do not have disciplinary information to disclose.

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

Ando Arashi and its management do not have any other financial industry activities or affiliations to disclose.



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

As a fiduciary, our firm and its associates have a duty of utmost good faith to act solely in the best interests of each Client. Our Clients entrust us with their funds and personal information, which in turn places a high standard on our conduct and integrity. Our fiduciary duty is a core aspect of our Code of Ethics and represents the expected basis of all our dealings. The firm also accepts the obligation not only to comply with the mandates and requirements of all applicable laws and regulations but also to take responsibility to act in an ethical and professionally responsible manner in all professional services and activities.

### **Code of Ethics Description**

This code does not attempt to identify all possible conflicts of interest, and literal compliance with each of its specific provisions will not shield associated persons from liability for personal trading or other conduct that violates a fiduciary duty to advisory Clients. A summary of the Code of Ethics' Principles is outlined below.

- Integrity - Associated persons shall offer and provide professional services with integrity.
- Objectivity - Associated persons shall be objective in providing professional services to Clients.
- Competence - Associated persons shall provide services to Clients competently and maintain the necessary knowledge and skill to continue to do so in those areas in which they are engaged.
- Fairness - Associated persons shall perform professional services in a manner that is fair and reasonable to Clients, principals, partners, and employers, and shall disclose conflict(s) of interest in providing such services.
- Confidentiality - Associated persons shall not disclose confidential Client information without the specific consent of the Client unless in response to proper legal process, or as required by law.
- Professionalism - Associated persons' conduct in all matters shall reflect the credit of the profession.
- Diligence - Associated persons shall act diligently in providing professional services.

We periodically review and amend our Code of Ethics to ensure that it remains current, and we require all firm access persons to attest to their understanding of and adherence to the Code of Ethics at least annually. Our firm will provide a copy of its Code of Ethics to any Client or prospective Client upon request.

### **Investment Recommendations Involving a Material Financial Interest and Conflicts of Interest**

Neither our firm, its associates or any related person is authorized to recommend to a Client or effect a transaction for a Client, involving any security in which our firm or a related person has a material financial interest, such as in the capacity as an underwriter, adviser to the issuer, etc.

### **Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest**

Our firm and its “related persons” do invest in the same securities, or related securities, e.g., warrants, options or futures, which we recommend to Clients, as long as full disclosure is given.

### **Trading Securities At/Around the Same Time as Client’s Securities**

We reserve the right to trade in securities at or around the same time as Clients, as long as full disclosure is given.

## **Item 12 Brokerage Practices**

### **Brokerage for Client Referrals**

We receive no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

### **Clients Directing Which Broker-Dealer/Custodian to Use**

We do not recommend specific broker-dealers to our clients, and clients are free to use the broker-dealer of their choice.

Clients custody their assets at a custodian of their choice. Ando Arashi does not provide custody services currently.

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

Andrew Haley, Manager of Ando Arashi, will work with Clients to obtain current information regarding their assets and investment holdings and will review this information as part of our financial planning services. Ando Arashi does not provide specific reports to financial planning Clients, other than financial plans.

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

We do not receive any economic benefit, directly or indirectly, from any third party for advice rendered to our Clients. Nor do we, directly or indirectly, compensate any person who is not advisory personnel for Client referrals.

### **Item 15 Custody**

Ando Arashi does not take custody of client funds.

Clients should receive at least quarterly statements from the broker-dealer, bank or other qualified custodian that holds and maintains Client's investment assets. We urge you to carefully review such statements and compare such official custodial records to reports that we may provide to you.

## **Item 16 Investment Discretion**

Currently, our firm does not provide investment discretionary services to our clients. All clients will retain full control over the exact timing and quantity of securities purchased.

## **Item 17 Voting Client Securities**

We do not vote Client proxies. Therefore, Clients maintain exclusive responsibility for: (1) voting proxies, and (2) acting on corporate actions pertaining to the Client's investment assets. The Client shall instruct the Client's qualified custodian to forward to the Client copies of all proxies and shareholder communications relating to the Client's investment assets. If the Client would like our opinion on a particular proxy vote, they may contact us at the number listed on the cover of this brochure.

In most cases, you will receive proxy materials directly from the account custodian. However, in the event we were to receive any written or electronic proxy materials, we would forward them directly to you by mail, unless you have authorized our firm to contact you by electronic mail, in which case, we would forward you any electronic solicitation to vote proxies.

## **Item 18 Financial Information**

Registered Investment Advisers are required in this Item to provide you with certain financial information or disclosures about our financial condition. We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to Clients, and we have not been the subject of a bankruptcy proceeding.

We do not have custody of Client funds or securities or require or solicit prepayment of more than \$500 in fees per Client six months in advance.

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

Please see Form ADV Part 2B for information on our principal executive officers and management persons.

Ando Arashi is wholly focused on providing the services described in Item 4 and does not engage in other businesses.

Ando Arashi are not compensated for advisory services with performance-based fees.

Ando Arashi or its employees have not been involved in one of the events listed below:

- An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
  - an investment or an investment-related business or activity;
  - fraud, false statement(s), or omissions;
  - theft, embezzlement, or other wrongful taking of property;
  - bribery, forgery, counterfeiting, or extortion; or
  - dishonest, unfair, or unethical practices.
- An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
  - an investment or an investment-related business or activity;
  - fraud, false statement(s), or omissions;
  - theft, embezzlement, or other wrongful taking of property;
  - bribery, forgery, counterfeiting, or extortion; or
  - dishonest, unfair, or unethical practices.

Ando Arashi or its employees have no relationship or arrangement with any issuer of securities that is not listed in Item 10.C. of Part 2A.

The logo for Ando Arashi is centered within a light gray square. It consists of the word "ANDO" in a black, sans-serif font, followed by the word "ARASHI" in a white, sans-serif font inside a black rectangular box.

ANDO ARASHI

209 Shaw St  
Mechanicsburg, Pennsylvania 17050

717-280-8008

<https://www.ando-arashi.com/>

## **Form ADV Part 2B Client Brochure Supplement**

**August 6, 2023**

***For***  
**Andrew Haley - Individual CRD #7727474**

Manager

This brochure supplement provides information about Andrew Haley that supplements the Ando Arashi LLC Brochure. A copy of that brochure precedes this supplement. Please contact Andrew Haley if the Ando Arashi LLC brochure is not included with this supplement or if you have any questions about the contents of this supplement. Additional information about Andrew Haley is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) which can be found using the identification number 7727474.

## **Item 2: Educational Background and Business Experience**

### **Andrew Haley**

- Born 1979

### **Education**

- BS, University of Wisconsin-Madison, 1979
- MS, Naval Postgraduate School, 2016

### **Business Experience**

- Research Associate, International Monetary Fund, 2001-2003
- Supply Officer, United States Navy, 2004-Present

## **Item 3: Disciplinary Information**

Andrew Haley has never been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

## **Item 4: Other Business Activities**

None

## **Item 5: Additional Compensation**

Andrew Haley does not receive any economic benefit from any person, company, or organization, in exchange for providing Clients advisory services through Ando Arashi LLC.

## **Item 6: Supervision**

Andrew Haley, as Manager of Ando Arashi LLC, is responsible for supervision. He may be contacted at the phone number on this brochure supplement.

## **Item 7: Requirements for State Registered Advisers**

Andrew Haley has NOT been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.



***For***  
**Ai Haley - Individual CRD #7727475**

Chief Compliance Officer and Administrative Officer

This brochure supplement provides information about Ai Haley that supplements the Ando Arashi LLC Brochure. A copy of that brochure precedes this supplement. Please contact Ai Haley if the Ando Arashi LLC brochure is not included with this supplement or if you have any questions about the contents of this supplement.

Additional information about Ai Haley is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) which can be found using the identification number 7727475.

## **Item 2: Educational Background and Business Experience**

### **Ai Haley**

- Born 1975

### **Education**

- AA Mesa College, 2009

### **Business Experience**

- Supply Manager, US Navy Fleet Logistics Center Yokosuka, 2009-2012
- Customer Service Agent, American Airlines, 2014

## **Item 3: Disciplinary Information**

Ai Haley has never been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

## **Item 4: Other Business Activities**

None

## **Item 5: Additional Compensation**

Ai Haley does not receive any economic benefit from any person, company, or organization, in exchange for providing Clients advisory services through Ando Arashi LLC.

**Item 6: Supervision**

Andrew Haley, as Manager of Ando Arashi LLC, is responsible for supervision. He may be contacted at the phone number on this brochure supplement.

**Item 7: Requirements for State Registered Advisers**

Not Applicable.