

## Item: 1 Cover Page

Roi Advisory LLC  
639 Clayton St  
San Francisco CA 94117  
November 6, 2023

This brochure provides information about the qualifications and business practices of Roi Advisory LLC. If you have any questions about the contents of this brochure, please contact us at [chip@getroi.app](mailto:chip@getroi.app) or (415) 294-0545. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority.

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

Roi Advisory LLC's registration as an investment adviser does not imply a certain level of skill or training, but only indicates that Roi Advisory LLC has registered its business with federal regulatory authorities, including the SEC.

## Item 2: Material Changes

This is the Advisers initial application brochure. As such, there are no material changes to be reported at this time.

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## Item 4: Advisory Business

### Firm Description

Roi Advisory LLC (hereinafter referred to as “Roi Advisory”, the “Firm”, “we”, “us”, “our”) is a Delaware corporation with its principal office located in San Francisco, CA and is registered with the Securities and Exchange Commission (the “SEC”) as an investment advisor. The Firm is owned by Sujith Vishwajith and Chip Davis.

As of July 31, 2023, Roi Advisory had no non-discretionary assets under management.

### Services

Roi Advisory seeks to provide individual investors (each a “Client,” and collectively, “Clients”) with portfolio insights, financial planning, and advisory services within the Roi app. This includes portfolio allocation (breakdowns across asset classes, sectors, etc.), trading analysis (including trade losses, volume and frequency of transactions, trade performance, etc.), dividend projections, and interest earnings summary. Roi Advisory does not open accounts or custody assets; portfolio insights are derived from existing brokerage accounts and asset schedules. Roi Advisory interacts with its Clients predominantly through a software application that is available through mobile platforms (the “App” or “App Platform”). Roi Advisory interacts with investment advisory clients, as well as prospective clients, solely through the App Platform. Roi Advisory services are tailored to individual clients through recommendations based off of an algorithmic analysis of each individuals portfolio. Clients to not have the ability to impose restrictions. Roi Advisory does not provide investment advice in person or over the phone or in any manner other than through the App. Roi Advisory does not offer tax, accounting, or legal advice.

## Item 5: Fees and Compensation

1. The fees applicable to Clients are set forth in detail in each membership agreement. Roi Advisory's clients pay a fixed fee ("Fixed Fee") to Roi Advisory. The Fixed Fees generally range from \$5 - \$50 monthly, depending upon services elected, with a discount for quarterly packages. The Fixed Fee provides access to the App Platform and is collected by Roi Advisory. Roi Advisory may from time to time, in its sole discretion, offer lower fees through promotions, referrals and other discounts to some accounts that differ from the fees stated above.

Fees must be paid in advance. If a customer terminates services after the billing period, services will remain in effect through the close of the billing cycle in which services were terminated. Refunds will not be given on a pro rata basis.

A customer may incur certain charges imposed by other third parties (e.g., transfer fees, administrative fees, and other fees). A client may also incur certain separate charges imposed by the custodian such as: wire transfer and electronic fund fees, retirement account custodial or account termination fees, in addition to certain taxes on non-retirement brokerage accounts.

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.

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

Roi Advisory does not accept performance-based fees and does not engage in side-by-side management.

## Item 7: Types of Clients

Roi Advisory provides investment advice to individuals. There is no account size minimum.

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

### INVESTMENT STRATEGIES

Roi Advisory utilizes the App Platform to collect information with respect to each client and prospective clients and to deliver account notifications and content, and to provide Roi Advisory's investment recommendations.

Upon account opening ("Client Onboarding"), the client will be prompted to complete a series of questions that will be used, in combination with other available client information collected through the App Platform prior to and/or after account opening including banking information. These questions are important to the development of any investment recommendations.

Client Onboarding is only complete once a client (i) has linked the client's supported brokerage account ("Funding Account") to the Firm's custodian via the App Platform. No staff at the Firm will have access to a client's bank account information nor will staff at the Firm have access to a client's login credentials; and (ii) has accepted and countersigned Roi Advisory's investment advisory agreement electronically. Only when Client Onboarding is complete will a client have the availability to purchase stocks via the App Platform via their existing accounts.

Clients will be provided with an investing strategy recommendation that they either accept or reject. Clients can also choose to search for other companies within the App Platform to invest in. Client accounts are self-directed. Roi Advisory's investment advisory services are only offered through electronic means, e.g., via the App Platform. Roi Advisory does not interact with clients in person, over the phone, in live chat or in any other manner.

In order to meet its objective of providing clients a user-friendly access to investing, Roi Advisory's recommendations will be based on information collected by Roi Advisory through the App Platform such as a client's answers to the Roi Advisory personal financial summary questionnaire which is part of the sign-up process.

Clients are requested to provide information, which in combination with other available client information collected through the App Platform, guides Roi Advisory in making a recommendation for that particular investor. Roi Advisory makes use of an algorithm to process a client's answers to a series of questions and to make an investment recommendation. The accuracy of the data provided by the client is important to their investment recommendation. Roi Advisory does not verify the information received from the client. Roi Advisory is expressly authorized to rely on information provided by the client when making investment recommendations.

Investment recommendation(s) is/are limited to account(s) of clients maintained on the Roi App Platform and do not take into consideration client accounts held outside of Roi Advisory. Roi Advisory does not consider a client's personal tax situation when making investing recommendations. Clients should consult with their own tax advisor when considering investing for their own account.

We currently offer non-discretionary investment management services. Clients retain full investment discretion over the implementation of investment decisions of each investing recommendation. Clients are also free to purchase other stock offered by Roi Advisory that have not been recommended or offered based on a client's interests. Clients are free to accept or reject any recommendation from Roi Advisory.

Clients should consider that Roi Advisory primarily uses electronic (not telephonic) means to provide customer support. To receive customer support, clients may contact us using email or through the App Platform. Clients and prospective clients should be comfortable communicating through those channels. Further, clients should understand that clients will not interact directly with investment advisory personnel.

Roi Advisory reserves the right to deny any prospective clients access to the Roi App Platform and to terminate client accounts for reasons related, but not limited, to unsuitability and/or if clients fail to timely maintain financial and other information previously provided by the client on the App Platform or update this information on at least an annual basis. A client's failure to timely update their information in the App Platform could materially impact the quality and applicability of Roi Advisory's investment recommendations.

A client may terminate an account or subscription at any time.

#### RISK OF LOSS

We cannot guarantee our analysis methods will yield a return. In fact, a loss of principal is always a risk.

Recommendations made for Client accounts are subject to various market, currency, economic, political, and business risks. Despite our best efforts, the investment recommendations we make will not always be profitable nor can we guarantee any level of performance. Roi Advisory does not represent, warrant, or imply that the services or methods of analysis used can or will predict future results, successfully identify market tops or bottoms, or insulate clients from major losses due to market corrections or crashes. No

guarantees are offered that clients' goals or objectives will be achieved. Further, no promises or assumptions can be made that the advisory services offered by Roi Advisory will provide a better return than other investment strategies.

Investments in securities and other financial instruments involve risk of loss that investors must be prepared to bear. Below are certain risks associated with the strategies discussed above. This is a summary only. The specific risks applicable to a client will depend upon a range of factors.

#### Market Volatility Risk

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. Changing external economic conditions in the U.S. and global economics could have a significant impact on the success of the App Platform and Clients' investments. The stability and sustainability of growth in global economies may be impacted by terrorism or acts of war. There can be no assurance that such markets and economic systems will be available for issuers of securities and crypto assets available via the App Platform to operate. Changing economic conditions, thus, could potentially adversely impact the valuation of Clients' investments in securities and crypto assets via the App Platform.

#### Equity-Related Risk

Investing in individual companies involves investments in common stocks and is subject to the volatility and individual risks associated with those stocks. These price movements may result from factors affecting individual companies, industries, or the securities market as a whole. Individual companies may report poor results or be negatively affected by industry and/or economic trends and developments. The prices of securities issued by such companies may suffer a decline in response. In addition, the equity market tends to move in cycles, which may cause stock prices to fall over short or extended periods of time.

Fixed Income-Related Risk: Investing in fixed income instruments is subject to the interest rate risk and individual risks associated with those securities. These price movements may result from factors affecting interest rates, corporate debt, inflation, or the securities market as a whole. Holdings may be negatively affected by macroeconomic trends and developments. In addition, the fixed income markets tend to move in cycles, which may cause fixed income security prices to fall over short or extended periods of time.

#### Domestic Equity Market Risks

Under strategies utilizing equity securities, clients are subject to the risk that stock prices may fall over short or extended periods of time. Individual companies may report poor results or be negatively affected by industry and/or economic trends and developments. The prices of securities issued by such companies may suffer a decline in response. These factors contribute to price volatility, which is the principal risk of investing in equity securities.

#### Crypto Asset Risk

Among other risks associated with crypto assets, the prices of crypto assets can be and have been extremely volatile, and crypto asset exchanges have been closed due to fraud, failure, or security breaches. Crypto assets are created, issued, transmitted, and stored according to protocols run by computers in crypto asset networks. It is possible that these protocols have undiscovered flaws which could result in the loss of some or all crypto assets held by the Client. There may also be network attacks against these protocols which may result in the loss of some, or all crypto assets held by the Client. Some crypto assets held by the Client may be created, issued, or transmitted using experimental cryptography which could have underlying flaws. Advancements in quantum computing could break the cryptographic rules of protocols which support the crypto assets offered by Roi Advisory. Roi Advisory makes no guarantees about

the reliability of the cryptography used to create, issue, or transmit the crypto assets held by the Client.

- *Crypto assets do not have stable values.* Crypto assets represent a speculative investment and involve a high degree of risk. As relatively new products and technologies, crypto assets have not been widely adopted as a means of payment for goods and services by major retail and commercial outlets. Conversely, a significant portion of the demand for crypto assets is generated by speculators and investors seeking to profit from the short- or long-term holding of crypto assets. The relative lack of acceptance of crypto assets in the retail and commercial marketplace limits the ability of end clients to pay for goods and services with crypto assets. A lack of expansion by crypto assets into retail and commercial markets, or a contraction of such use, may result in increased volatility.

Prices of crypto assets have fluctuated widely for a variety of reasons and may continue to experience significant price fluctuations. Several factors may affect the price of the crypto assets, including, without limitation: (i) total crypto assets in existence; (ii) global crypto asset supply and demand; (iii) Clients' expectations with respect to the rate of inflation of fiat currencies; (iv) currency- and crypto asset-exchange rates; (v) interest rates; (vi) fiat currency withdrawal and deposit policies of the crypto asset exchanges; (vii) trade volume and liquidity on crypto asset exchanges; (viii) interruptions, suspensions, or terminations of major crypto asset exchanges; (ix) cyber theft of crypto assets from online crypto asset wallet providers, or news of such theft from such providers, or theft from individual crypto asset wallets; (x) investment and trading activities of hedge funds and other large crypto asset investors; (xi) sovereign monetary policies, trade restrictions, and inflation controls; (xii) regulatory measures that affect the usability of crypto assets as a form of legal tender and/or otherwise restrict or facilitate crypto asset purchases, sales, or holdings; (xiii) availability and popularity of businesses that provide crypto asset-related services; (xiv) development and maintenance of opensource software protocols for crypto asset networks, applications or platforms; (xv) increased competition from other payment services; and (xvi) domestic and foreign political, economic, and financial events and/or uncertainty. If crypto asset markets continue to be subject to high volatility, Clients may experience losses based on their investments. Even if Clients are able to hold their crypto assets for long, potentially indefinite periods, their crypto assets may never generate a profit. Additionally, Clients should be aware that there is no assurance that the crypto assets will maintain their long-term value in terms of future purchasing power.

- *Prior performance of a crypto asset is not necessarily indicative of future results.* Many crypto assets have experienced high levels of performance and rapid increases in price, followed by significant downturns in performance and similarly rapid decreases in price.
- *Crypto assets may not have long-term viability.* Crypto assets are a new and relatively untested product. There is considerable uncertainty about their long- term viability, which could be affected by a variety of factors, including many market-based factors such as economic growth, inflation, and others. In addition, the success of crypto assets will depend on the long-term utility and economic viability of blockchain, and other new technologies related to crypto assets. Due in part to these uncertainties, the price of crypto assets is volatile and may be hard to sell. Roi Advisory does not control any of these factors, and therefore may not be able to control the ability of any crypto asset to maintain its value over time.
- Regulatory changes may affect the value of crypto assets. Regulation of crypto assets in the U.S. and in foreign jurisdictions is in its early stages of development and is subject to unpredictable changes which may have an adverse impact on the crypto assets offered via the App Platform. The regulatory status of crypto assets remains unclear or unsettled in many jurisdictions. Legislative and regulatory changes or actions at the local, state, federal, foreign, or international level may adversely affect the use, transfer, exchange, and value of crypto assets. These legislative and regulatory changes or



actions are difficult to predict and may adversely impact the crypto assets offered via the App Platform.

As crypto assets have grown in popularity and market size, U.S. legislators and regulators have begun to develop laws and regulations and have, at times, released interpretive guidance governing the crypto asset industry. Both legislators and regulators have expressed concerns that crypto assets can be used by criminals to evade taxes and launder money. To the extent that future actions by legislators and/or regulators impose restrictions or limitations on the crypto asset market, the demand for crypto assets is likely to be reduced. In addition, such actions may limit the ability of Clients to convert crypto assets into fiat currency or use crypto assets to pay for goods and services, which, in each case, is likely to result in a reduction of demand and, in turn, a decline in the value of crypto assets.

Additional or changing regulations could also limit the use of crypto assets on various crypto asset platforms. Such reductions in use could decrease or remove the value of the functionality achieved on those platforms and cause a substantial decrease in the value of the crypto assets.

Various foreign jurisdictions may adopt laws, regulations, or directives that address the crypto asset market and participants in such market. Any such laws, regulations, or directives may (i) conflict with those of the U.S., (ii) negatively impact the acceptance of crypto assets inside and outside the U.S., (iii) impede the growth or sustainability of the crypto asset market in foreign jurisdictions, and/or (iv) otherwise negatively affect the value of crypto assets. These laws, regulations or directives, if any, are impossible to predict, but any such change could be substantial and adverse to the value of investments made by Clients in crypto assets.

#### Investment Strategy and Method of Analysis Material Risks

We cannot guarantee that an investment objective or planning goal will be achieved. As an investor, each client must be able to bear the risk of loss that is associated with their account, which may include the loss of some, or all principal invested.

#### Company Risk

When investing in securities, there is always a certain level of company or industry specific risk that is inherent in each company or issuer. For example, there is the risk that a company will perform poorly or have its value reduced based on factors specific to the company or its industry. This is also referred to as unsystematic risk and can be reduced or mitigated through diversification.

#### Inflation Risk

When any type of inflation is present, a dollar today will not buy as much as a dollar next year because purchasing power is eroding at the rate of inflation.

#### Use of Algorithms

Roi Advisory incorporates computer-based technology to make investment recommendations primarily through the use of algorithms. Changes to the algorithmic code could have material effects on a client's stock recommendations. Roi Advisory's 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. Roi Advisory may modify periodically these algorithms, or a computer system's code or underlying

assumptions, and these changes may have unintended consequences. Additional information regarding relevant considerations for clients considering an automated digital investment advisory program (sometimes referred to as a “robo adviser”) is contained in the Investor Bulletin from the Securities and Exchange Commission available at [https://www.sec.gov/oiea/investor-alertsbulletins/ib\\_robo-advisers.html](https://www.sec.gov/oiea/investor-alertsbulletins/ib_robo-advisers.html).

#### Cybersecurity Risk

The information and technology systems of Roi Advisory, as well as of key service providers, including third-party vendors, central agents, exchanges, clearing houses, and other financial institutions (including the custodian), are vulnerable to potential damage or interruption from computer viruses, network failures, computer and telecommunication failures, infiltration by unauthorized persons and security breaches, usage errors by their respective professionals, power outages and catastrophic events such as fires, tornadoes, floods, hurricanes and earthquakes. Roi Advisory and client accounts could be adversely impacted if any of the aforementioned parties is the subject of a cyber-attack or other information security event. Although Roi Advisory has implemented various measures designed to seek to manage risks relating to these types of events, if these systems are compromised, become inoperable for extended periods of time or cease to function properly, it may be necessary for Roi Advisory or a service provider to make a significant investment to fix or replace them and to seek to remedy the effect of such issues. The failure of these systems and/or of disaster recovery plans for any reason could cause significant interruptions in Roi Advisory’s ability to transact business on behalf of its clients and could result in a failure to maintain the security, confidentiality, or privacy of sensitive data, including personal information. While many investment advisers are subject to the same or similar risks in respect of their operations, these risks are particularly acute with respect to Roi Advisory due to Roi Advisory’s fundamental dependence on technology.

#### Limited Nature of the Recommendations

The use of algorithms carries the risk that changes to the algorithm’s code may not have the desired effect with respect to a client’s account. While this risk increases if changes to an algorithm are insufficiently tested prior to implementation, even extensively tested changes may not produce the desired effect over time. The App Platform relies on a limited universe of inputs to generate a stock recommendation for each client from a limited universe of possible outputs. In particular, the App Platform currently generates suggested stock purchases based on a client’s response to questions provided by the client through the App Platform. Roi Advisory does not verify the completeness or accuracy of such information or consider any information regarding outside assets, concentration, debt, or other accounts a client may have with any third party. The functionality of the App Platform is partly dependent upon information provided by the third-party custodian, and other external sources, meaning that performance of the App Platform could be impacted by issues with the delivery, or the accuracy of the information provided.

#### Limited Nature and Scope of the Service

We do not provide comprehensive financial or tax planning or legal advice. Clients should seek the advice and counsel of their own tax, financial, and legal advisers. Roi Advisory only provides stock recommendations to individual investors. We do not provide investment advice to IRA or tax-exempt investors. We are not responsible for withholding any tax penalties that may apply to our clients or for any state or federal income tax withholding, except as may otherwise be required by applicable law. Roi Advisory’s recommendations are limited based on the information clients provide through the App Platform, the limitations of which are further discussed above. Clients should take into consideration the

limited nature of the service in evaluating the recommendations provided through the App Platform. Furthermore, the service: (a) is not a complete investment service; (b) does not account for multiple investment goals; (c) does not consider outside assets, concentration, debt, or other accounts a client may have with any third party; (d) offers a limited number of investments; (e) may not be suitable for all investors; and (f) relies on the information provided by clients in providing investment advice and does not verify the completeness or accuracy of such information.

There could be one or more products available in the investment community that are more appropriate than the investment products made available through the App Platform. Given the inherent limitations of the service, clients should carefully consider whether our service is the right investment solution for their savings and investing needs.

#### Regulatory Changes

It is possible that changes in applicable laws and regulations may affect Roi Advisory's operations. The consequences of additional regulation on the liquidity of markets and the functioning of the service (and, possibly, on Roi Advisory itself) cannot be predicted and may materially affect the investment advisory services offered by Roi Advisory.

### **Item 9: Disciplinary Information**

There are no criminal or civil actions to report. There are no administrative proceedings to report. There are no self-regulatory organization proceedings to report.

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

Roi Advisory is not registered as a: broker/ dealer, representatives of a broker/dealer, a Futures Commission Merchant, Commodity Pool Operator, Commodity Trading Advisor. Roi Advisory does not have any material relationships to its advisory business that would present a possible conflict of interest. We do not utilize nor select other advisers or third-party managers.

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

Roi Advisory's ethical and legal duty is to act at all times as a fiduciary to its clients. This means that Roi Advisory puts the interests of its clients ahead of its own and seeks to manage any perceived or actual conflict of interest that may arise in relation to our advisory services. Roi Advisory has adopted a Code of Ethics ("COE"), which is designed to ensure that it meets its fiduciary obligation to clients, enhances its culture of compliance within the firm, and detects and prevents any violations of securities laws.

Roi Advisory's COE establishes standards of conduct for Roi Advisory's officers and employees ("Supervised Persons") and is consistent with the Code of Ethics requirements of Rule 204A-1 under the Investment Advisers Act of 1940, as amended. The COE includes general requirements that all Supervised Persons comply with their fiduciary obligations to clients and applicable securities laws, and also contains specific requirements relating to, among other things, personal trading, insider trading, conflicts of interest, and confidentiality of client information. Roi Advisory's COE will be provided to any client or prospective client upon request.

Roi Advisory and its employees may purchase, sell, or otherwise enter into transactions for their own accounts in securities and other instruments. Prior to, or simultaneously with, or after such transactions,

Roi Advisory may, for its Clients, via the App Platform, provide suggestions for purchasing stock involving any of these same securities or other instruments, and any related securities or instruments (including securities issued by the same issuer, options on such securities or instruments, and instruments convertible into such securities or instruments). Roi Advisory has adopted the Code of Ethics discussed above to address potential conflicts. Subject to certain restrictions, Roi Advisory and each of their employees personally may at any time hold, acquire, increase, decrease, dispose of, or otherwise deal with positions in investments in which a Client may have an interest from time to time. Roi Advisory has no obligation to recommend or acquire for a Client account a position in any security which it acquires or recommends on behalf of another Client, or which an employee acquires for his or her own account.

## Item 12: Brokerage Practices

Users are able to select their own brokerage at their discretion, provided that they have an existing account (as Roi Advisory will not open accounts). Should the user wish to trade, such brokerage selection must also be a trade-supported brokerage on the Roi App, as indicated within the App itself.

Roi Advisory does not receive any research, products, or services from its custodian or another third-party (known as soft dollars) in connection with client securities transactions. Roi Advisory does not receive referrals from a broker-dealer or third party in exchange for using that broker dealer or third party.

## Item 13: Review of Accounts

Roi Advisory provides its clients with access to their account information via the App Platform. The App Platform will use clients input to assess their risk appetite and investment objectives. All App Platform recommendations are reviewed annually to ensure they align with the indicated risk appetite. On an annual basis, Roi Advisory will contact each client to request that the profile information previously provided be updated, if appropriate due to changes in circumstance. Roi Advisory will confirm the indicated risk appetite based off of client input with each client on an annual basis. Clients must promptly update the financial and other information they previously input through the App Platform if any financial or other information changes. A client's failure to timely update this information could materially impact the quality and applicability of Roi Advisory's advice and recommendations.

## Item 14: Client Referrals and Other Compensation

Roi Advisory does participate in revenue sharing with our parent company, Vega Corp. We do not currently receive compensation from other third-parties when we recommend certain products.

Roi Advisory offers compensation to current Clients and promoters for referring new Clients. Roi Advisory has certain arrangements in which it pays third party affiliates (e.g., bloggers and others) who refer clients to Roi Advisory a flat fee for such services. In addition, Roi Advisory's "refer a friend" or similar program offers small cash or non-cash rewards, more favorable fee arrangements and/or reduced or waived advisory fees for both the referring Client and the referred Client for each referral.

New Clients are advised of compensation before opening the account. Referring Clients and promoters must adhere to terms and conditions established by Roi Advisory and set forth in an agreement with Roi Advisory in accordance with Securities and Exchange Commission New Marketing Rule. Referrals can only be made within the Roi Advisory App Platform. Clients are not charged any fee or other costs for being referred to Roi Advisory by a current Client, marketer or promoter. These arrangements may create an

incentive for a third party or other existing Client to refer prospective Clients to Roi Advisory, even if the third party would otherwise not make the referral. These arrangements may also create a conflict of interest for a Client to maintain a certain level of assets managed through Roi Advisory if doing so would result in eligibility to receive an incentive, bonus or additional compensation.

## Item 15: Custody

Roi Advisory does not have actual custody of client funds or securities and does not provide custodial services to its clients. Client funds and securities are maintained at an independent qualified custodian as described in Item 4. Clients will receive statements directly from the qualified custodian at least quarterly. We urge clients to carefully review those statements and compare the custodial records to the reports that we provide them. The information in our reports may vary from custodial statements due to accounting procedures, reporting dates or valuation methodologies of certain securities.

Clients will receive account statements from the custodian and are urged to compare their statements to the account information provided by Roi Advisory.

## Item 16: Investment Discretion

Roi Advisory does not accept investment discretion of its client's accounts.

## Item 17: Voting Client Securities

Roi Advisory does not have, and will not accept, authority to vote client securities. Generally, clients receive their proxies or other solicitations directly from their custodial broker dealer or a transfer agent, as applicable, and should direct any inquiries regarding such proxies or other solicitations directly to the sender.

## Item 18: Financial Information

Roi Advisory does not require or solicit prepayment of fees by clients six or more months in advance and is therefore not required to include a balance sheet for its most recent fiscal year.

Roi Advisory is not aware of any financial condition reasonably likely to impair its ability to meet contractual commitments to clients and has not been the subject of a bankruptcy petition at any time during the past ten years.