## Item 1. Cover Page

# AdvisiFi LLC

a Registered Investment Adviser

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This brochure (the "Brochure") provides information about the qualifications and business practices of AdvisiFi LLC ("AdvisiFi" or the "Firm"). Registration does not imply a certain level of skill or training. If you have any questions about the contents of the Brochure, please contact the Firm at (917) 553-3553 or rbrewster@advisifi.co. The information in the 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 AdvisiFi also is available on the SEC's website at www.adviserinfo.sec.gov.

## Item 2. Material Changes

This Item discusses material changes to the Brochure since its last annual update. AdvisiFi has no changes to disclose in relation to this Item.

# Item 3. Table of Contents

## Item 4. Advisory Business

AdvisiFi is an SEC registered investment adviser that was formed in June 2024. The Firm is wholly owned by InvestiFi Inc. ("InvestiFi"). The Firm does not have assets under management to report in response to this Item.

AdvisiFi provides discretionary and non-discretionary investment advisory services to clients ("Clients") who are members of third-party credit unions and customers of third-party banks (collectively, "Financial Institutions") that enable access to AdvisiFi's web-based platform (the "Platform"). Clients access the Platform through such Financial Institutions' respective websites. AdvisiFi interacts with Clients predominantly through a software application that is available through the Platform and its advisory services are delivered solely through the Platform. AdvisiFi does not provide investment advice in person, over the phone, or in any manner other than through the Platform. AdvisiFi maintains an online presence through www.AdvisiFi.co for informational purposes.

Through a questionnaire available through the Platform, Clients provide personal information about themselves, including employment status, income, investment goals and reasons to invest, time horizon and net assets (collectively, their "Investment Profile") AdvisiFi evaluates each Client's responses and makes recommendations aligning with his or her Investment Profile. The investment recommendations made by AdvisiFi for each Client are based solely upon the information provided by Clients to the Firm via their Investment Profile or elsewhere through the Platform. As such, the suitability of the Firm's investment recommendations is limited by and relies on the accuracy and completeness of the information provided by the Client. AdvisiFi does not capture any additional information not covered in the questionnaire and/or the Platform in making its risk assessment and providing its investment advice. Clients are obligated to update their information through the Platform promptly if there are changes to their financial situation, goals, objectives, personal circumstances or if other relevant information changes or becomes available.

AdvisiFi's investment advisory services include non-discretionary investment recommendations through the Platform. Such recommendations consist of curated buckets of equity securities, American Depositary Receipts ("ADRs"), and exchange traded funds ("ETFs"), sorted according to risk. Clients are then responsible for determining securities to purchase from among the securities recommended by AdvisiFi, and the timing of any sales therein. To facilitate this, Clients grant AdvisiFi authority to effect securities transactions on their behalf. Such non-discretionary trading authority permits AdvisiFi to effect transactions to buy or sell securities with the prior consent of the Client. Such prior consent is required for each transaction recommended by AdvisiFi.

AdvisiFi's investment advisory services also include discretionary management of Client portfolios, which include equity securities, ADRs, ETFs, and cash equivalents. The Firm actively manages each portfolio, whereby it has the authority to buy, sell, and otherwise effect investment transactions for a Client's funds and securities without the Client's prior consent or approval. The Firm monitors each portfolio on an ongoing basis, and implements changes, as appropriate.

To enter into an advisory relationship, a Client is required to agree to an investment advisory agreement with AdvisiFi ("Investment Advisory Agreement"), which discusses the services the Client will receive, the fees charged to the Client (as applicable), and the conditions of the Client's relationship with AdvisiFi. The Firm's advisory relationship with a Client begins upon the effective date of the Investment Advisory Agreement with a Client. A customer of a Financial Institution is not a Client of AdvisiFi unless and until he or she enters into an Investment Advisory Agreement with the Firm. Any preliminary information provided to a Client before the Firm accepts the Investment Advisory Agreement does not constitute investment advice under the Investment Advisers Act of 1940, as amended (the "Advisers Act"), and should not be relied on as such.

To receive advisory securities, Clients are required to open a brokerage account with CDS1 Securities LLC ("CDS"), which is introduced to a third-party, RQD* Clearing LLC ("RQD*"), which provides custody, clearing, and settlement services for AdvisiFi's Clients. InvestiFi indirectly owns a non-controlling interest in CDS and certain of our management persons are registered representatives of CDS, which presents certain conflicts of interest, as further discussed in Item 5 and Item 10, below. Both CDS and RQD are SEC-registered broker-dealers and Financial Industry Regulatory Authority ("FINRA") members. RQD* buys and sells supported securities assets, stores securities assets acquired by Clients, and tracks securities transactions via the Platform. The investments in each Client's account are held in a separate account in their name at RQD*, and not with AdvisiFi.

AdvisiFi offers services with respect to individual taxable accounts and individual retirement accounts ("IRA"), specifically Roth IRA and traditional IRA accounts. Neither the Firm nor any of its affiliates are responsible for establishing or maintaining any Client's compliance with the requirements of the Internal Revenue Code for a traditional IRA or Roth IRA, or any other type of account serviced by the Firm, or determining any Client's individual tax treatment regarding such account. Furthermore, neither the Firm nor any of its affiliates are responsible for withholding any tax penalties that may apply to accounts serviced by the Firm or for any state or federal income tax withholding, except as may otherwise be required by applicable law.

AdvisiFi does not provide comprehensive financial or tax planning or legal advice, and Clients are advised and afforded the opportunity to seek the advice and counsel of the Client's own tax, financial, and legal advisers. The Firm's services are not a complete investment program, and Clients should not use it as the sole component of their investment plan.

## Item 5. Fees and Compensation

AdvisiFi does not charge a fee for its advisory services, however, Clients will incur certain charges, fees, and commissions earned by third-parties, including its affiliate, CDS. Specifically, Clients will incur charges including (but are not limited to) brokerage fees and commissions charged by RQD* or other broker-dealers through which AdvisiFi executes securities transactions for Clients, odd-lot differentials, charges imposed directly by an ETF in a Client's account, as disclosed in the fund's prospectus (e.g., fund management fees and other fund expenses), transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. CDS receives compensation in connection with transactions placed by AdvisiFi through RQD* and based upon the amount of assets held at RQD*. A conflict of interest exists because AdvisiFi has an indirect incentive to use CDS as the introducing broker for its clients' accounts because any compensation paid by RQD* to CDS for servicing these accounts will be provided to an affiliate of AdvisiFi (which benefits InvestiFi), rather than an unaffiliated broker-dealer and because AdvisiFi has an incentive to recommend additional transactions to increase compensation to CDS.

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

Performance-based fees are those based on a share of capital gains on or capital appreciation of the assets of a Client. AdvisiFi does not provide any services to Clients for performance-based fees.

## Item 7. Types of Clients

AdvisiFi provides services to individuals.

The Firm does not maintain requirements for opening or maintaining an account, such as a minimum account size, however, Clients must have a balance in their account with the Financial Institution through which they access the Firm's services in order to establish and maintain an advisory relationship with the Firm.

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

**Methods of Analysis and Investment Strategies**

As set forth above, AdvisiFi's investment advisory services include non-discretionary investment recommendations through the Platform, as well as discretionary management of Client portfolios.

### Non-Discretionary Services

The Firm's non-discretionary recommendations consist of curated buckets of equity securities, ADRs, and ETFs, sorted according to risk (Low Volatility, Moderate Volatility, High Volatility). Clients are then responsible for determining securities to purchase from among the recommended securities, and the timing of any sales therein.

AdvisiFi selects equity securities, ADRs, and ETFs and assigns them to risk-based buckets based on the Firm's qualitative and quantitative due diligence. The Firm chooses stocks because of their exposure to specific industries, liquidity, transparency, risk profile, and diversification. In the Firm's due diligence and analysis process, the Firm utilizes a form of quantitative analysis in which it analyzes historical market data (including volatility) and other benchmarks. The Firm uses the data inputs collected from the Client to recommend stocks that it believes will meet the Client's Investment Profile. The Firm periodically reviews the equity securities, ADRs, and ETFs and their assignment among the Firm's risk-based buckets.

Client portfolios constructed based on the Firm's non-discretionary recommendations may hold a relatively small number of security positions, which will expose the portfolio to the particular industry or market sector the security represents and the value of the specific company. Losses in one or more positions, or a downturn in an industry or market sector in which the company participates, could adversely affect the portfolio's performance in a particular period. Such limited diversification may heighten the concentration of risk, which, in turn, could expose the Client to losses disproportionate to market movements in general if there are disproportionately greater adverse price movements with respect to investments.

### Discretionary Services

Client portfolios managed on a discretionary basis include equity securities, ADRs, and ETFs. The Firm monitors each portfolio on an ongoing basis, and implements changes, as appropriate.

AdvisiFi manages Client accounts through the use of similarly managed "model" portfolios, whereby AdvisiFi allocates all or a portion of its Clients' assets among equity securities, ADRs, ETFs, and cash equivalents on a discretionary basis. The strategies selected are personalized to each Client based on his or her Investment Profile. AdvisiFi manages Client portfolios, including but not limited to security asset selection, rebalancing, and other investment considerations. Model output may be manually overridden by AdvisiFi, if in the best interests of Clients, based on the principals' previous experience, such as during historically unique market environments.

The strategies used to manage model portfolios may involve above average portfolio turnover that could negatively impact Clients' net after tax gains. While the Firm seeks to ensure that Clients' assets are managed in a manner consistent with his or her Investment Profile, securities transactions effected pursuant to a model investment strategy are usually done without consideration to a Client's individual tax ramifications.

## Risk of Loss

AdvisiFi cannot guarantee any level of performance or that any Client will avoid a loss of account assets. Any investment in securities involves the possibility of financial loss that Clients should be prepared to bear.

Subject to the Advisers Act, AdvisiFi shall have no liability for any losses in a Client's account. The price of any security can decline for a variety of reasons outside of AdvisiFi's control, including, but not limited to, changes in the macroeconomic environment, unpredictable market sentiment, forecasted or unforeseen economic developments, interest rates, regulatory changes, and domestic or foreign political, demographic, or social events. There is no guarantee that AdvisiFi's judgment or investment decisions about particular securities will necessarily produce the intended results. AdvisiFi's judgment may prove to be incorrect, and a Client might not achieve his or her investment objectives.

When evaluating risk, financial loss may be viewed differently by each Client and may depend on many different risk items, each of which may affect the probability of adverse consequences and the magnitude of any potential losses. The following risks may not be all-inclusive but should be considered carefully by a prospective Client before entering the Platform. These risks should be considered as possibilities, with additional regard to their actual probability of occurring and the effect on a Client if there is, in fact, an occurrence.

- **Market Risk:** The price of a security, mutual fund, exchange-traded fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, macroeconomic environment, unpredictable market sentiment, forecasted or unforeseen economic developments, interest rates, regulatory changes, and domestic or foreign political, demographic, or social events. If a Client has a high allocation in a particular asset/class, it may negatively affect overall performance to the extent that the asset/class underperforms relative to other market assets. Conversely, a low allocation to a particular asset class that outperforms other asset/classes in a particular period may cause that Client account to underperform relative to the overall market.

- **Investment Risk:** There is no guarantee that AdvisiFi's judgment or investment decisions about particular securities and asset classes will necessarily produce the intended results. AdvisiFi's judgment may prove to be incorrect, and a Client might not achieve his or her investment objectives. AdvisiFi may also make future changes to the investing algorithms and services that it provides. In addition, it is possible that Clients or AdvisiFi itself may experience computer equipment failure, loss of internet access, viruses, or other events that may impair access to AdvisiFi's software based financial service.

- **Volatility and Correlation Risk:** Clients should be aware that AdvisiFi's asset selection process is based in part on an evaluation of past price performance and volatility in order to evaluate future probabilities. However, it is possible that different or unrelated asset/classes may exhibit similar price changes in similar directions which may adversely affect a Client and may become more acute in times of market upheaval or high volatility. Past performance is no guarantee of future results, and any historical returns, expected returns, or probability projections may not reflect actual future performance.

- **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.

- **ADR Risk:** ADRs are typically issued by a U.S. bank or trust company and represent ownership of underlying foreign securities. In addition to the risks presented in any investment (e.g., changes in value, changes in demand, etc.), there are several risks unique to ADRs that must be considered. For instance, while they will react to normal market fluctuations like regular stocks, ADRs also are still vulnerable to currency risks. If the value of the company's home currency falls too much relative to the U.S. Dollar, the effect will trickle down to the ADR eventually. The same can be said for changes in the home country's government.

- **ETF Risk:** ETF performance may not exactly match the performance of the index or market benchmark that the ETF is designed to track because (1) the ETF will incur expenses and transaction costs not incurred by any applicable index or market benchmark; (2) certain securities comprising the index or market benchmark tracked by the ETF may, from time to time, temporarily be unavailable; and (3) supply and demand in the market for either the ETF and/or for the securities held by the ETF may cause the ETF shares to trade at a premium or discount to the actual net asset value of the securities owned by the ETF. Certain ETF strategies may from time to time include the purchase of fixed income, commodities, foreign securities, ADRs, or other securities for which expenses and commission rates could be higher than normally charged for exchange-traded equity securities, and for which market quotations or valuation may be limited or inaccurate. ETFs typically include embedded expenses that may reduce the fund's net asset value, and therefore directly affect the fund's performance and indirectly affect a Client's portfolio performance or an index benchmark comparison. Expenses of the fund may include investment adviser management fees, custodian fees, brokerage commissions, and legal and accounting fees. ETF expenses may change from time to time at the sole discretion of the ETF issuer. ETF tracking error and expenses may vary. Investors are also liable for taxes on any fund-level capital gains, as ETFs are required by law to distribute capital gains in the event they sell securities for a profit that cannot be offset by a corresponding loss.

- **Reliance on Management and Other Third-Parties:** ETF investments will rely on third-party management and advisers. AdvisiFi will not have an active role in the day-to-day management of fund investments. Carried interest and other incentive distributions to fund management may create an incentive towards more speculative investments than would otherwise have been made.

- **Liquidity and Valuation Risk:** High volatility and/or the lack of deep and active liquid markets for a security may prevent the sale of a Client's securities at an advantageous time or price because AdvisiFi and RQD* may have difficulty finding a buyer and may be forced to sell at a significant discount to market value. Some securities (including ETFs) that hold or trade financial instruments may be adversely affected by liquidity issues as they manage their portfolios. While AdvisiFi values the securities held in Client accounts based on reasonably available exchange-traded security data, AdvisiFi may from time to time receive or use inaccurate data, which could adversely affect security valuations, transaction size for purchases or sales, and/or the resulting fees paid to AdvisiFi.

- **Credit Risk:** AdvisiFi cannot control, and Clients are exposed to the risk that financial intermediaries or issuers may experience adverse economic consequences that may include impaired credit ratings, default, bankruptcy or insolvency, any of which may affect portfolio values or advice given by AdvisiFi. This risk applies to assets on deposit with any broker utilized by a Client, notwithstanding asset segregation and insurance requirements that are beneficial to Clients generally. In addition, exchange trading venues or trade settlement and clearing intermediaries could experience adverse events that may temporarily or permanently limit trading or adversely affect the value of securities held by Clients. Finally, any issuer of securities may experience a credit event that could impair or erase the value of the issuer's securities held by a Client.

- **Legislative and Tax Risk:** Performance may directly or indirectly be affected by government legislation or regulation, which may include, but is not limited to changes in investment adviser or securities trading regulation; change in the U.S. government's guarantee of ultimate payment of principal and interest on certain government securities and changes in the tax code that could affect interest income, income characterization, and/or tax reporting obligations.

- **Inflation, Currency, and Interest Rate Risk:** Security prices and portfolio returns will likely vary in response to changes in inflation and interest rates. Inflation causes the value of future dollars to be worth less and may reduce the purchasing power of an investor's future interest payments and principal. Inflation also generally leads to higher interest rates, which in turn may cause the value of many types of fixed income investments to decline.

The liquidity and trading value of foreign currencies could be affected by global economic factors, such as inflation, interest rate levels, and trade balances among countries, as well as the actions of sovereign governments and central banks.

- **Automated Investing:** AdvisiFi relies on static questionnaires consisting of a limited number of questions that form the sole basis for its investment recommendations. Such questionnaires are very limited in nature. The questions may not, or may not accurately, capture an individual Client's needs. Although Clients may change and update their responses, AdvisiFi does not, at this time, make investment advisory personnel available to Clients to highlight and explain important concepts or clarify the details of a specific Client's financial goals and needs. Online and electronic interactions are limited compared to face-to-face individual advice.

- **Operational Risk:** Operational risk is the exposure to the chance of loss arising from shortcomings or failures in internal processes or systems of AdvisiFi or RQD*, external events impacting those systems, and human error. A Client account may suffer a loss arising from shortcomings or failures in internal processes, people or systems, or from external events. Operational risk can arise from many factors ranging from routine processing errors to potentially costly incidents related to, for example, major systems failures.

  Trade errors and other operational mistakes ("Operating Events") occasionally may occur in connection with AdvisiFi's implantation of securities transactions for Client accounts. AdvisiFi has policies and procedures that address identification and correction of Operating Events. An Operating Event generally is compensable by AdvisiFi to a Client when it is a mistake (whether an action or inaction) in which AdvisiFi has, in AdvisiFi's reasonable view, deviated from the applicable investment guidelines or the applicable standard of care in servicing a Client account, subject to the considerations set forth below.

  Operating Events may include, but are not limited to, the following: (1) the placement of orders (either purchases or sales) in excess of the amount intended to trade for a Client account; (2) the purchase (or sale) of when it should have been sold (or purchased); (3) a purchase or sale not intended for the Client account; and (4) incorrect allocations of trades. Operating Events can also occur in connection with other activities that are undertaken by AdvisiFi, such as fee calculations, and other matters that are non-advisory in nature.

  AdvisiFi makes its determinations regarding Operating Events pursuant to its policies on a case-by-case basis, in its discretion, based on factors it considers reasonable, including regulatory requirements, contractual obligations, and business practices. Not all Operating Events will be considered compensable mistakes.

  Relevant factors AdvisiFi considers when evaluating whether an Operating Event is compensable include, among others, the nature of the service being provided at the time of the event, specific applicable contractual and legal requirements and standards of care, whether an applicable investment guideline was contravened, and the nature of the relevant circumstances.

Operating Events may result in gains or losses or could have no financial impact. Clients are entitled to retain any gain resulting from an Operating Event. Operating Events, involving erroneous transactions in Client accounts generally are corrected in accordance with the procedures established by AdvisiFi and/or RQD*.

When AdvisiFi determines that reimbursement by AdvisiFi is appropriate, the Client will be compensated as determined in good faith by AdvisiFi. AdvisiFi will determine the amount to be reimbursed, if any, based on what it considers reasonable guidelines regarding these matters in light of all of the facts and circumstances related to the Operating Event. In general, compensation is expected to be limited to direct and actual losses, which may be calculated relative to comparable conforming investments, market factors and benchmarks and with reference to related transactions, and/or other factors AdvisiFi considers relevant. Compensation generally will not include any amounts or measures that AdvisiFi determines are speculative or uncertain.

- **Cybersecurity Risk:** AdvisiFi and its service providers are subject to risks associated with a breach in cybersecurity. Cybersecurity is a generic term used to describe the technology, processes and practices designed to protect networks, systems, computers, programs and data from cyber-attacks and hacking by other computer users, and to avoid the resulting damage and disruption of hardware and software systems, loss or corruption of data, and/or misappropriation of confidential information. In general, cyber-attacks are deliberate, but unintentional events may have similar effects. Cyber-attacks may cause losses to AdvisiFi's Clients by interfering with the processing of transactions, affecting AdvisiFi's ability to calculate net asset value or impeding or sabotaging trading. Clients may also incur substantial costs as the result of a cybersecurity breach, including those associated with forensic analysis of the origin and scope of the breach, increased and upgraded cybersecurity, identity theft, unauthorized use of proprietary information, litigation, and the dissemination of confidential and proprietary information. Any such breach could expose AdvisiFi to civil liability as well as regulatory inquiry and/or action. In addition, Clients could be exposed to additional losses as a result of unauthorized use of their personal information. While the Firm has established business continuity plans, incident responses plans and systems designed to prevent cyber-attacks, there are inherent limitations in such plans and systems, including the possibility that certain risks have not been identified. Similar types of cybersecurity risks also are present for issuers of securities that the Firm recommends, which could result in material adverse consequences for such issuers and may cause a Client's investment in such securities to lose value.

- **Catastrophic Event Risk:** Clients, AdvisiFi, and their respective affiliates, may be subject to the risk of loss arising from direct or indirect exposure to a number of types of catastrophic events, including without limitation (1) the highly contagious form of coronavirus ("COVID-19") that resulted in the World Health Organization declared a pandemic on March 11, 2020; (2) other public health crises, including any outbreak of SARS, H1N1/09 influenza, avian influenza, other coronavirus, Ebola or other existing or new epidemic diseases, or the threat thereof; or (3) other major events or disruptions, such as hurricanes, earthquakes, tornadoes, fires, flooding and other natural disasters; acts of war or terrorism, including cyberterrorism; or major or prolonged power outages or network interruptions. The extent of the impact of any such catastrophe or other emergency on AdvisiFi's and/or a Client's operational and financial performance and each Client's investments will depend on many factors, including the duration and scope of such emergency, the extent of any related travel advisories and restrictions, the impact on overall supply and demand, goods and services, investor liquidity, consumer confidence and levels of economic activity, and the extent of its disruption to important global, regional and local supply chains and economic markets, all of which are highly uncertain and cannot be predicted. In particular, to the extent that any such event occurs and has a material effect on global financial markets or specific markets in which a Client participates (or has a material effect on any locations in which AdvisiFi operates or on any of its personnel) the risks of loss could be substantial and could have a material adverse effect on Clients or the ability of AdvisiFi to fulfill its investment objectives on behalf of its Clients.

- **Limitations of Disclosure:** The foregoing list of risks does not purport to be a complete enumeration or explanation of the risks involved in investing in investments. As investment strategies develop and change over time, Clients may be subject to additional and different risk factors. No assurance can be made that profits will be achieved, or that substantial losses will not be incurred.

## Item 9. Disciplinary Information

Neither AdvisiFi nor its management persons have been involved in any legal or disciplinary events that are material to a Client's evaluation of its advisory business or the integrity of its management.

## Item 10. Other Financial Industry Activities and Affiliations

AdvisiFi's parent company, InvestiFi, offers technology services to Financial Institutions, certain of which engage the Firm to offer the investment advisory services to their respective members. Neither AdvisiFi's nor InvestFi charge Financial Institutions fees for AdvisiFi's investment advisory services to such Financial Institutions' members, however, to access AdvisiFi's services for their members, Financial Institutions must be customers of InvestFi, which increases the value of

InvestFi's services.  Accordingly, AdvisiFi's receives an indirect economic benefit in connection with its provision of investment advisory services to Clients.  Further, as set forth in Item 7, above, Clients must have a balance in their account with the Financial Institution through which they access the Firm's services in order to establish and maintain an advisory relationship with the Firm, which presents a conflict of interest.

InvestiFi is an indirect owner of CDS and certain of our management persons are registered representatives of CDS. CDS receives compensation in connection with transactions placed by AdvisiFi through RQD*. A conflict of interest exists because AdvisiFi has an indirect incentive to use CDS as the introducing broker for its clients' accounts because any compensation paid by RQD* to CDS for servicing these accounts will be provided to an affiliate of AdvisiFi (which benefits InvestiFi), rather than an unaffiliated broker-dealer and because AdvisiFi has an incentive to recommend additional transactions to increase compensation to CDS.

Neither the Firm not any of its management persons (as such term is defined in the Glossary to Form ADV) have other financial industry affiliations requiring disclosure pursuant to this Item.

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

AdvisiFi has adopted a Code of Ethics ("Code") as required by the applicable securities laws.  The Code establishes and reinforces a standard of business conduct expected of its supervised persons and provides specific guidance related to managing conflicts of interests and AdvisiFi's fiduciary duty to its Clients.  This includes procedures relating to: (1) the confidentiality of Client information; (2) a prohibition on insider trading; (3) a prohibition of rumormongering; (4) restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items; (5) personal securities trading procedures; and (6) reporting of internal violations of the Code, among other things.  All supervised persons at AdvisiFi must acknowledge the terms of the Code annually, or as amended.  AdvisiFi will provide a copy of its Code to Clients and prospective Clients upon request.

AdvisiFi anticipates that, in appropriate circumstances, consistent with Clients' investment objectives, it will recommend to accounts advised by AdvisiFi to effect the purchase or sale of securities in which AdvisiFi, its management persons and/or Clients, directly or indirectly, have a position or interest.  These activities are expected to create conflicts of interest between AdvisiFi and its Clients with regard to such matters as allocation of opportunities to participate in, or refrain from participation in, particular investments or to dispose of certain investments.  The Firm addresses these conflicts in various ways, including (1) through disclosure in this Brochure; (2) the Firm is required to recommend securities that are suitable for each Client based upon the Client's Investment Profile; and (3) the Firm has established a variety of restrictions, procedures and disclosures designed to address potential conflicts of interest—both those arising between and among Client accounts as well as between Client accounts and the Firm's business.

AdvisiFi's employees and persons associated with AdvisiFi are required to follow AdvisiFi's Code. Subject to satisfying the policies therein, and applicable laws, officers, directors, and employees of AdvisiFi may trade for their own accounts in securities which are recommended to and/or purchased for AdvisiFi's Clients. The Code is designed to assure that the personal securities transactions, activities, and interests of the Firm's employees will not interfere with (1) making decisions in the best interest of Clients; and (2) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code, certain classes of securities have been designated as exempt transactions, based upon a determination that personal employee transactions in these types of securities would not materially interfere with the best interest of AdvisiFi's Clients. Employee trading is monitored under the Code, and to reasonably prevent conflicts of interest between AdvisiFi and its Clients.

To request a copy of the Code, please contact AdvisiFi at (917) 553-3553 or rbrewster@advisifi.co.

## Item 12. Brokerage Practices

AdvisiFI's use of CDS and RQD* will comply with its duty to obtain "best execution." In seeking best execution, the determinative factor is not just cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of the broker's services described above. AdvisiFi requires CDS and RQD* as broker-dealers for Clients. Clients cannot designate or select a different broker for trade execution. AdvisiFI may use other brokers to execute trades for Client accounts other than RQD*. As part of its best execution responsibilities, AdvisiFI reviews and monitors, among other things, (a) data and/or reports regarding execution costs of transactions executed by RQD*. AdvisiFI seeks to ensure that Clients' transactions are conducted in the best interest of Clients, including by continuing to seek to obtain best execution for Clients through AdvisiFI's review and adoption of CDS' best execution policies and procedures, and any material updates thereto with regard to trades placed by or through CDS. In addition, AdvisiFI's trade allocation policy seeks to (i) provide a fair allocation of purchases and sales of investments among Clients, (ii) not systematically advantage one Client over another, and (iii) ensure compliance with appropriate regulatory requirements. As discussed further above, from time to time, RQD* receives compensation in the form of rebates, monetary compensation, or inter-company transfer of funds for routing customer orders, including orders for Clients, to a designated exchange, market maker, dealer, or market center for execution. CDS receives payments from RQD* in connection with such order flow, and, in all cases, AdvisiFI and CDS, seek the best execution possible for Clients' orders

Orders placed by AdvisiFi for Clients are expected to be placed with CDS and RQD*and effected by AdvisiFi manually and/or through electronic trading systems maintained CDS and RQD*, which will then execute such transactions. When AdvisiFi considers it to be in Clients' best interest, the Firm may, but is not required to, aggregate a Client's orders for the sale or purchase of securities for the Client's account with orders for other Clients' accounts. Under this approach, the transactions may be averaged as to the price and will be allocated among Clients in proportion to the purchase and sale orders placed for each Client account.

## Item 13. Review of Accounts

AdvisiFi will contact or remind Clients on a no less than annual basis to ask if there have been any changes to their Investment Profile, and to update their Investment Profile. The Firm's algorithm updates and confirms the Firm's recommendations whenever Clients update their Investment Profile through the Platform. In addition, the Firm's Chief Compliance Officer reviews its recommendations to Clients no less than quarterly. Such reviews may be conducted on a sampling basis.

All information relating to Client accounts, including account performance and account balance, are provided on the Platform in real-time. In addition, RQD* prepares statements showing all transactions and account balances on at least a quarterly basis. AdvisiFi urges Clients to compare RQD* account statements with the information available on the Platform.

## Item 14. Client Referrals and Other Compensation

AdvisiFi does not currently provide compensation to Clients for testimonials or third-parties for endorsements.

As set forth in Item 10, above, AdvisiFi's parent company, InvestiFi, offers technology services to Financial Institutions, certain of which engage the Firm to offer the investment advisory services described in this Brochure to their respective members. The Firm does not charge Financial Institutions a fee in connection with its investment advisory services to their members, however, to access AdvisiFi's services for their members, a Financial Institution must be a customer of InvestFi, which increases the value of InvestFi's services. Accordingly, AdvisiFi receives an indirect economic benefit in connection with its provision of investment advisory services to Clients.

## Item 15. Custody

AdvisiFi does not maintain custody of Client assets that it advises through the Platform. Client assets are maintained in an account at a "qualified custodian," RQD*. Clients receive account statements from RQD* on at least a quarterly basis. All Clients are advised to review their account statements promptly to confirm the accuracy of the information contained. Should discrepancies or errors be found, Clients should contact AdvisiFi directly at (917) 553-3553 or rbrewster@advisifi.co.

## Item 16. Investment Discretion

AdvisiFi accepts non-discretionary and discretionary authority on behalf of Clients, as described above. Non-discretionary trading authority permits AdvisiFi to effect transactions to buy or sell securities with the prior consent of the Client. Such prior consent is required for each transaction recommended by AdvisiFi. Discretionary trading authority permits AdvisiFi to effect transactions to buy or sell securities without the prior consent of the Client.

## Item 17. Voting Client Securities

AdvisiFi does not exercise voting authority over proxies for Clients' securities. Clients receive proxies directly from the RQD*. The Firm does not provide advice on such issuer solicitations. Clients shall maintain exclusive responsibility for all legal proceedings or other type events pertaining to the account assets, including, but not limited to, class action lawsuits.

## Item 18. Financial Information

AdvisiFi does not require or solicit the prepayment of any fees and does not have any financial condition that is reasonably likely to impair it from meeting its contractual commitments to Clients. AdvisiFi has not been the subject of any bankruptcy proceedings.