

SR99 Advisors

Firm Brochure (Form ADV Part 2A)

Dated: November 7, 2025

ITEM 1: COVER PAGE

Matthew Fee dba SR99 Advisors
Firm Brochure (Form ADV Part 2A)
Dated: November 7, 2025

Contact Information:

Principal Office: 4969 Westwood St, Simi Valley, Ca. 93063
Phone: 8184706870
Email: SR99Advisors@gmail.com

This brochure provides information about the qualifications and business practices of SR99 Advisors. If you have any questions about the contents of this brochure, please contact us at the number above. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any State securities authority.

SR99 Advisors may use terms like ‘Registered Investment Adviser’ (RIA) or ‘Registered Adviser’ (RA). Registration with the SEC or State authorities does not guarantee any specific expertise or training.

Additional information about SR99 Advisors is also available on the SEC’s website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number known as the CRD number. Our firm’s CRD number is 338890. If you have questions about this brochure, please contact SR99 Advisors at 8184706870 or at SR99advisors@gmail.com

ITEM 2: MATERIAL CHANGES

This brochure, dated November 7, 2025, provides you with a summary of SR99 Advisors’ advisory services, fees, professionals, business practices, policies, and any conflicts of interest.

We must update specific information every year, and this needs to be done within 90 days after our fiscal year ends on December 31. We will provide clients with a summary of material changes or a full updated brochure within 120 days of our fiscal year end.

This is the first update and initial brochure as we are applying for State Registration in the State of California.

A newly established, family-managed boutique advisory firm.

- The firm's name is SR99 Advisors "aka" SR99.
- Ownership updated to include Matt Fee as principal member.

It should be noted that Matt Fee holds two professional licenses: one as a Financial Advisor and another as a Licensed Real Estate Broker in the State of California.

If a client requests specific California Real Estate services, including property purchases or residential sales, a **separate contract** will be needed to engage with Matt C. Fee Realty.

ITEM 3: TABLE OF CONTENTS

Item 1: Cover Page

Item 2: Material Changes

Item 3: Table of Contents

Item 4: Advisory Business

Item 5: Fees and Compensation

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

Item 7: Types of Clients

Item 8: Methods of Analysis, Investment Strategies, and risk of Loss

Item 9: Disciplinary Information

Item 10: Other Financial Industry Activities and Affiliations

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

Item 12: Brokerage Practices

Item 13: Review of Accounts

Item 14: Client Referrals and other compensation

Item 15: Custody

Item 16: Investment Discretion

Item 17: Voting Client Securities

Item 18: Financial Information

Item 19: Requirements for State- Registered Advisers

ITEM 4: ADVISORY BUSINESS

SR99 Advisors is a private family-owned boutique State registered investment adviser based in California. Established in 2025, SR99 Advisors is owned and operated by **Matt Fee who serves as the firm's CEO/CCO/CIO.**

Our firm provides personalized, trusted, high-quality advisory services that combine deep industry expertise with innovative technology. We leverage proprietary financial models and advanced artificial intelligence (AI) tools to optimize portfolio management and maximize client returns.

Advisory Services Offered:

Investment Management Services & Individual Portfolio Management with Discretion:

SR99 Advisors offers continuous, customized investment advice tailored to each client's unique financial situation. Through detailed discussions, we develop an investment policy guideline reflecting the client's objectives, risk tolerance, time horizon, and liquidity needs. Many client portfolios are managed with discretion, but non-discretionary clients also receive some level of support. SR99 engages prominent broker-dealers, including Vanguard and Charles Schwab, to securely manage custody of clients' assets. Simply put, SR99 uses major broker-dealer custodians such as Charles Schwab, Vanguard, or Fidelity, to hold your funds. Implementation of discretionary services will be executed via a retainer agreement along with a (LPOA) limited power of attorney specific to financial advisement. Clients can impose reasonable restrictions on investments in certain securities or sectors.

SR99 Advisors advises individuals small businesses regarding pensions, 401(k)s, and IRAs—with clarity and simplicity. The firm advises on investment selection and choice of investment vehicles such as, for example, a ROTH IRA. Consulting fees are based on a sliding scale of assets-under-management (AUM) noted below in the fees and compensation section.

Our recommendations can be broad and flexible, encompassing a variety of securities and investment vehicles, potentially including but not limited to:

- Exchange-listed securities
- Over-the-counter securities
- Corporate debt securities
- Commercial paper
- Certificates of deposit
- Municipal securities
- Closed-end funds
- ETF's
- Foreign securities
- ADR's
- Variable life insurance and annuities
- Mutual funds
- U.S. government securities
- Private equity Investments
- Real Estate
- Real Estate funds
- Private mortgages
- Asset Backed Cryptocurrencies
- Foreign Currencies
- Foreign Stock Markets
- Arbitrage Strategies
- Shorting Strategies
- Market Timing Strategies
- Zero Coupon Bonds
- Real Estate Investment
- Ipo's
- Art
- Rare Cars
- Rare Coins
- Rare Stamps
- Rate Clothing
- Rare sports memorabilia
- Bullion (Gold, Silver, Platinum)

We recommend investments consistent with each client's stated objectives and risk profile. Our proprietary financial models and AI-driven tools enhance our ability to identify investment opportunities, manage risk, and respond dynamically to evolving market conditions.

General Financial Planning:

We provide general comprehensive financial planning services that will evaluate a client's current and future financial circumstances, utilizing all known disclosed financial assets and income streams and liabilities (A comprehensive financial planning questionnaire must be filled out) The financial plan SR99 generates serves as a strategic guide to help clients achieve their long-term financial goals.

SR99 Advisors currently recommends exceptionally large Broker Dealers that are global in scope, trusted, financially stable and innovative such as: Charles Schwab, Vanguard, etc. to hold client's assets while SR99Advisors provides its discretionary and non-discretionary advisement services to its clients.

Areas addressed in a financial plan may include:

- Personal financial matters, including budgeting, family records, and estate planning.
- Tax and cash flow analysis (within the scope of Financial Advisory) with projections for current and future tax liabilities.
- Investment alternatives and portfolio impact
- Insurance coverage reviews, including life, health, disability, long-term care, liability, home, and automobile insurance.
- Retirement planning strategies.
- Mortgage Strategies
- Reverse Mortgage Strategies
- Estate planning review
- **SR99 Advisors will defer specific Legal Advice to a licensed Lawyer, as well as Advanced Tax Strategy to a licensed CPA or EA.**

Clients receive a detailed written report with recommendations. Implementation remains at the client's discretion, and collaboration with the client's other professional advisors is encouraged. A signed engagement document will be required before any services are provided, a signed engagement letter with limited power of attorney may or may not be needed depending on our client's needs.

Consulting Services & Financial Planning:

SR99 Advisors also offers specialized consulting services tailored to specific client concerns including but not limited to: Financial advisory services, estate planning, retirement planning, wholistic wealth management inclusive and exclusive of Real Estate ownership, mortgage advisement, and long-term goal setting. Our recommendations are independent and not limited to

any specific product or service provider. Financial planning and consulting services are available on an hourly fee basis. However, SR99 believes that managing accounts with limited power of attorney (LPOA) will provide clients with the most favorable long-term outcomes.

SR99 Advisors does not sell insurance or securities or Real Estate. Clients are under no obligation to act on the investment adviser's recommendation. Clients are free to choose whichever pathway they feel is best for them.

SR99 Advisors does not participate in wrap fee programs.

Assets Under Management:

As of September 28, 2025, the firm's assets under management total zero dollars.

ITEM 5: FEES AND COMPENSATION

SR99 Advisors charges fees for their advisory services as outlined below. Our fees are designed to be competitive and aligned with clients' interests.

Investment Management Services and Individual Portfolio Management Fees

We charge a tiered percentage of assets under management (AUM), billed quarterly in arrears, based on the value of the account. The exact fee schedule is negotiated and specified in the client agreement but typically ranges between 0.45% to 1.25% annually. Fees may be negotiable depending on account size, complexity, or other factors. Services are charged based on the following schedule:

Assets Under Management	Annual Fee
\$100,000- \$249,000	1.25%
\$249,001- \$500,000	1.0%
\$500,001 - \$749,000	.8%
\$749,001- \$1,500,000	.6%

\$1,500,001 - \$2,350,000	.5%
Over \$2,350,000	.45%

For Example, fees are calculated as follows:

If a client had \$1,500,000 under management, the annual charge would be: $\$1,500,000 \times .006$ equals \$9000 dollars. Billed Quarterly would be: $\$1,500,000 \times .006$ equals \$9000 divided by 4 (4 quarters in one year) equals \$2250.

Let it be known that lower fees for comparable services may be available from other sources.

Financial Planning Services:

Financial planning services are charged on a fixed fee or hourly basis, as agreed upon with the client. Fees for a one-time POM (Peace of Mind) review of financial assets including real estate holdings usually range from \$350 to \$1150 per financial plan.

Consulting Services:

SR99 Advisors offers the first 15 minutes free to initial clients to assess suitability and overall necessity. SR99 Advisors is a fiduciary financial advisory firm that reserves the right to reduce the fee listed above or offer Pro-Bono services to clients in the community, based on specific circumstances.

Our consulting services are available either at an hourly rate—starting at \$295 per hour and billed in 15-minute increments—or for a fixed fee, depending on the specific type of engagement.

Fee Payment and Withdrawal:

Our firm does **not require or accept the prepayment of advisory fees**. Clients are billed in arrears for services rendered; therefore, no refunds of prepaid fees are necessary.

Clients may authorize SR99 Advisors to deduct fees directly from their custodial accounts. (i.e., Vanguard/Schwab) Clients receive detailed fee statements and account statements from their custodian at least quarterly. Other arrangements for payment of fees may be available on a case-by-case basis and can include but is not limited to: Square, personal check, or in unique situations Bullion or Art will be accepted in lieu of U.S. Dollars. We are not accepting Bitcoin currently. You may cancel our services at any time.

Other Fees and Expenses:

Neither our firm nor any of our supervised persons **accepts compensation for the sale of securities or other investment products**, including **asset-based sales charges or service fees from the sale of mutual funds**.

Our only compensation comes from the **advisory fees and/or financial planning fees** paid directly by our clients.

Clients may incur additional fees such as custodial fees, brokerage commissions, mutual fund expenses, or third-party fees. These are not fees charged by SR99. Broker-Dealers or Banks sometimes charge these types of fees. It is always advised to check and review your Broker-Dealer/Bank statements on a regular basis.

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

SR99 Advisors does not charge performance-based fees (fees based on a share of capital gains or capital appreciation of a client's account). We believe this fee structure may create conflicts of interest and therefore avoid it to maintain our fiduciary integrity.

ITEM 7: TYPES OF CLIENTS

SR99 Advisors will provide advisory services primarily to the following types of clients:

- Individuals and high-net-worth individuals
- Families and family offices
- Trusts and Estates
- Corporations and business entities
- Retirement plans and other institutional clients.
- Dual citizens

The minimum account size for non-custodial full discretionary account management is approximately \$100,000 dollars, however SR99 Advisors reserves the right to lower this amount or raise this amount depending on the circumstances.

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

SR99 Advisors employs a blend of fundamental and quantitative methods for investment analysis, including:

- Proprietary financial models developed in-house.
- Artificial intelligence and machine learning tools for data analysis and portfolio optimization
- Traditional fundamental analysis including economic, industry, and company research.
- Technical Analysis

We utilize diversified investment strategies including but not exclusive of or limited to equity, fixed income, alternative investments (such as private equity, real estate funds, and private mortgages, currencies, derivatives, arbitrage), etc.

METHODS OF ANALYSIS

SR99 Advisors uses the following methods of analysis when providing investment advice and/or managing client assets:

ASSET ALLOCATION:

Our approach emphasizes determining an appropriate balance among equities, fixed income, and cash equivalents, based on each client's financial objectives, time horizon, and risk tolerance.

The primary risk of this approach is that the client may not fully participate in gains experienced by a specific security, industry, or market segment. Additionally, changes in market values over time may alter the portfolio's allocation and, if not periodically rebalanced, the portfolio may no longer align with the client's investment objectives.

MUTUAL FUND AND/OR ETF ANALYSIS:

When evaluating mutual funds and exchange-traded funds (ETFs), we consider factors such as the manager's experience, consistency of investment process, and long-term performance record across varying market conditions. We also assess the underlying holdings to identify potential overlap among funds in a client's portfolio and monitor whether each fund continues to follow its stated investment mandate. The primary risks of this analysis include the fact that past performance does not guarantee future results, and that fund managers may deviate from their investment strategies. Additionally, overlapping holdings among funds may increase exposure to specific securities or sectors, potentially heightening the client's overall risk.

THIRD-PARTY MONEY MANAGER AND ASSET MANAGER ANALYSIS:

SR99 Advisors may recommend or utilize third-party investment managers and institutional asset management firms, such as PIMCO, BlackRock, Charles Schwab Asset Management, or similar organizations, to manage a portion of client portfolios. When doing so, we review each manager's experience, investment philosophy, performance history, and operational practices. As part of our due diligence process, we assess the manager's investment process, risk controls, and compliance environment. Ongoing monitoring includes periodic reviews of portfolio holdings, performance, and adherence to stated strategies.

Risks associated with this method include the possibility that a manager's past success may not continue, that the manager may deviate from his stated investment approach, or that its internal controls and compliance systems may prove inadequate. Because SR99 Advisors does not control the daily operations or trading decisions of these third-party or institutional managers, clients are subject to these additional risks.

RISKS FOR ALL FORMS OF ANALYSIS:

Our analyses rely on publicly available information, including financial statements, third-party data sources, and ratings agencies. Although we make reasonable efforts to verify the accuracy of this information, we cannot guarantee its completeness or reliability. Inaccurate or misleading information could affect our analysis and investment decisions.

INVESTMENT STRATEGIES

SR99 Advisors uses the following investment strategies, as appropriate to each client's individual goals, financial circumstances, investment objectives, and risk tolerance and IPS statement.

LONG-TERM PURCHASES:

This strategy involves purchasing securities with the intent of holding them for one year or longer. It is typically used when we believe securities are undervalued or when long-term exposure to a specific asset class is desired. The primary risk of this strategy is that the client may miss opportunities for short-term gains, and if our expectations prove incorrect, the value of the investment may decline before we decide to sell.

SHORT-TERM PURCHASES:

This strategy involves buying and selling securities within a shorter period (generally less than one year) to take advantage of anticipated market movements. The main risks include the potential for market timing errors, higher trading costs, and short-term volatility that may negatively impact returns.

RISK OF LOSS

Investing in securities involves risk of loss, including the potential loss of principal and clients should prepare for this risk. SR99 Advisors cannot guarantee that investment objectives will be achieved. Past performance does not guarantee future results.

All clients are required to discuss their risk tolerance and investment objectives with SR99 Advisors and to complete an Investment Policy Statement (IPS) prior to the implementation of any investment strategy and to assess suitability. The IPS documents each client's goals, time horizon, liquidity needs, and risk tolerance and serves as the foundation for portfolio construction, planning, and ongoing monitoring.

The IPS and corresponding investment allocations are **reviewed at least quarterly**, and more frequently when warranted by:

- Significant market volatility or economic disruptions,
- Material changes in a client's financial situation, objectives, or risk tolerance,
- Portfolio drift or deviation from target allocations that require rebalancing, or
- Extraordinary market or geopolitical shocks that may materially affect portfolio risk exposure.

This review process ensures that the client's portfolio remains aligned with both their stated objectives and current market conditions.

ITEM 9: DISCIPLINARY INFORMATION

SR99 Advisors and its principals have no reportable legal or disciplinary events. We uphold high ethical standards and comply fully with regulatory requirements.

ITEM 10: OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

Matt Fee, CEO and CIO of SR99 Advisors, is also the sole Broker-owner of Matt C. Fee Realty, a California based Real Estate Brokerage firm. Matt Fee is associated with SR99 Advisors and Matt C. Fee Realty. Matt Fee allocates his time as needed for each entity. Matt Fee has also been asked to serve on outside C-Suite Boards and may engage in these fiduciary opportunities as warranted.

Registration as a Broker-Dealer or Registered Representative of a Broker-Dealer:

Neither SR99 Advisers nor any of its management persons are registered as a broker-dealer, or as a registered representative of a broker-dealer. Additionally, no such registrations are pending.

Registration as a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor:

Neither SR 99 Advisers nor any of its management persons are registered, or have an application pending to register, as a futures commission merchant, commodity pool operator, or commodity

trading advisor. The firm and its personnel are not members of the National Futures Association (NFA).

Other Material Relationships or Arrangements:

SR 99 Advisers and its management persons do not have any material relationships or arrangements with related persons that are material to the firm's advisory business or its clients.

However, clients should be aware that **Matthew Clarke Fee**, a Managing Member of SR99 Advisers, has been a **California-licensed Real Estate Broker since 1992**. In his separate capacity as a Real Estate Broker, Mr. Fee may engage in Real Estate transactions for which he could earn commissions or other compensation that is **separate and distinct** from his advisory compensation with SR99 Advisers.

This activity presents a **potential conflict of interest**, as Mr. Fee could have an incentive to recommend Real Estate transactions or services that generate additional income for him. SR99 Adviser's addresses this potential conflict by fully disclosing it to clients and by requiring that any such recommendations be made solely in the client's best interest.

Clients are under no obligation to use Mr. Fee's Real Estate services in connection with any advisory relationship with SR99 Advisers. If a client chooses to engage Mr. Fee for Real Estate services, such services will be governed by a **separate written agreement** directly between the client and Mr. Fee in his capacity as a California Real Estate Broker.

ITEM 11: CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING Code of Ethics

Our Code of Ethics is based on our fiduciary duty to act in the **best interests of our clients** and to comply fully with applicable securities laws. It is designed to promote honest and ethical conduct, fair dealing, and full disclosure of all material conflicts of interest.

The Code of Ethics requires all supervised persons of SR99 Advisers to:

- Place client interests ahead of their own.
- Conduct all personal and professional activities with integrity and transparency.
- Comply with applicable securities laws and firm policies; and
- Avoid or disclose any actual or potential conflicts of interest.

The Code also includes policies regarding personal securities trading, reporting of personal holdings and transactions, and the protection of confidential client information.

A copy of SR99 Advisors' Code of Ethics is available to any client or prospective client upon request.

Participation or Interest in Client Transactions

SR99 Advisors and its related persons do not function as principal in transactions with clients — meaning we do not buy securities from, or sell securities to, clients from our own accounts.

However, from time to time, SR99 Advisors or its related persons may recommend to clients, or buy or sell for client accounts, securities in which SR99 Advisors or its related persons have a material financial interest (for example, in investment vehicles that SR99 Advisors or its personnel may also own).

These situations can create potential conflicts of interest because the firm or its personnel could benefit from client investment activity. SR99 Advisors addresses these conflicts by:

- Fully disclose any material conflicts to clients before or at the time of the transaction.
- Ensuring that any such transactions are fair and consistent with client objectives; and
- Conducting periodic compliance reviews to confirm adherence to our fiduciary obligations.

Personal Trading

SR99 Advisors and its related persons may, from time to time, invest in the same securities (or related securities, such as stocks, bonds, etf's or mutual funds) that are recommended to or purchased for clients. This presents a potential **conflict of interest**, as employees could benefit from market activity generated by client trades.

To manage these conflicts, SR99 Advisors enforces a **personal trading policy** requiring:

- Pre-approval (pre-clearance) of certain personal securities transactions by access persons.
- Review of all personal trading by the firm's Chief Compliance Officer (CCO); and

These policies are designed to ensure that clients receive priority and that employee trades are never made to the detriment of client accounts.

Timing of Personal and Client Transactions

It is possible that SR99 Advisors or its related persons may buy or sell the same securities for their own accounts at or around the same time that client accounts are being traded in those securities.

To address this, SR99 Advisors maintains policies to ensure that:

- Client transactions always receive priority over personal trades.
- Personal transactions are reviewed by the CCO for compliance and fairness; and
- No employee uses knowledge of client transactions for personal gain.

These measures help ensure that any personal trading by SR99 Advisors' personnel is consistent with our fiduciary duty to clients.

Summary

SR99 Advisors maintains a written Code of Ethics and compliance procedures designed to detect, prevent, and manage conflicts of interest related to personal trading and participation in client transactions. The firm's guiding principle is that client interests always come first.

A copy of SR99 Advisors' Code of Ethics is available to any client or prospective client upon request.

ITEM 12: BROKERAGE PRACTICES

Selection of Broker-Dealers

SR99 Advisors, LLC ("SR99 Advisors" or "the Firm") does not currently have any clients and therefore has not selected or recommended any broker-dealers for client transactions. Once the Firm begins managing client accounts, it anticipates recommending that clients establish brokerage accounts with one or more custodians or broker-dealers such as Charles Schwab & Co., Inc. ("Schwab"), Vanguard Brokerage Services ("Vanguard"), or Fidelity Brokerage Services, LLC ("Fidelity") (collectively, the "Recommended Custodians").

These broker-dealers have been identified for their financial strength, global reach, size, breadth of investment product offerings, trading technology, client service infrastructure, compliance culture, and overall reputation in the industry. SR99 Advisors believe that collaborating with these firms will allow clients to benefit from efficient trade execution, robust account management tools, and secure custody of client assets.

Although SR99 Advisors may recommend a custodian or broker-dealer, clients are always free to choose any qualified broker-dealer or custodian to hold their assets or execute transactions. If a client prefers to use a different custodian, SR99 Advisors will make reasonable efforts to accommodate that choice, provided the Firm can manage and trade efficiently on that platform.

When selecting broker-dealers for client transactions, SR99 Advisors will consider the overall quality of execution and services provided, not solely the lowest commission or transaction cost. The Firm will review its brokerage practices periodically to ensure clients continue to receive best execution consistent with their investment objectives and fiduciary duty.

Research and Other Soft Dollar Benefits

SR99 Advisors does not currently receive any soft dollar benefits, research, or other products or services from broker-dealers or third parties in connection with client transactions.

In the future, the Firm may receive access to products and services provided by the recommended custodians that assist in the management of client accounts. These may include trading and reporting platforms, market research, portfolio analysis tools, compliance or operational support, and educational materials.

Because these services benefit SR99 Advisors, a potential conflict of interest exists, as the Firm may have an incentive to recommend a broker-dealer based on the availability of such services rather than solely on clients' interest in receiving the most favorable execution.

To address this conflict, SR99 Advisors will base its recommendations on the overall value and quality of services provided to clients, not just on the availability of benefits to the Firm. SR99 Advisors will review its brokerage relationships periodically to ensure they remain consistent with the Firm's fiduciary duty and clients' best interests.

Brokerage for Client Referrals

SR99 Advisors does not have any arrangements with broker-dealers or other third parties to receive client referrals in exchange for directing brokerage transactions. The Firm does not anticipate entering such arrangements. If this practice changes, SR99 Advisors will fully disclose any referral-related conflicts to clients and describe how those conflicts are managed.

Directed Brokerage

SR99 Advisors does not currently require or request that client's direct brokerage to a particular broker dealer. In the future, clients may be permitted to direct the Firm to execute transactions through a broker-dealer of their choice.

If a client directs brokerage, SR99 Advisors may be unable to achieve the most favorable execution of client transactions or to aggregate orders for reduced transaction costs. As a result, clients who direct brokerage may pay higher commissions or receive less favorable trade execution than clients who allow the Firm to choose the broker-dealer.

Aggregation of Orders

SR99 Advisors does not currently aggregate orders, as it has no clients. In the future, when the Firm places trades for multiple client accounts, it may aggregate (“batch”) orders for the same security to obtain more favorable prices, lower execution costs, or more efficient execution.

ITEM 13: REVIEW OF ACCOUNTS

Item 13: Review of Accounts

Client accounts are reviewed on a **quarterly basis** by **Matthew Fee, Chief Investment Officer and Principal** of the firm. Reviews are conducted to ensure that each client’s portfolio remains aligned with their investment objectives, risk tolerance, and overall financial goals.

In addition to regularly scheduled reviews, accounts may also be reviewed when certain events occur, including but not limited to:

- A change in a client’s financial situation, investment objectives, or risk tolerance.
- Significant market movements or market shocks, such as sudden volatility or unexpected geopolitical or economic events.
- Major economic or interest rate changes.
- Material deposits or withdrawals of cash or securities.
- Implementation of a new investment strategy or portfolio reallocation; or
- At the request of the client.

The frequency and depth of each review may vary depending on the nature of the account, client preferences, and market conditions.

ITEM 14: CLIENT REFERRALS AND OTHER COMPENSATION

SR99 Advisors may receive non-monetary benefits from custodians, such as educational resources, but these do not influence our advice. However, SR99 may contract with outside marketing firms to promote SR99 to the public in compliance with fiduciary requirements.

ITEM 15: CUSTODY

Client assets are held with a qualified custodian (such as Charles Schwab, Vanguard, Fidelity, or another qualified custodian selected by the client.)

While SR99 Advisors may have discretionary trading authority and advisor fee deduction capacity through a Safe Harbor Limited Power of Attorney (LPOA), this authority is limited to the placement of trades and deduction of advisory fees. **IT DOES NOT PERMIT US TO WITHDRAW, TRANSFER, OR OTHERWISE MOVE CLIENTS' FUNDS.**

SR99 Advisors follows, in good faith the safeguarding procedures made available by the Department of Financial Protection and Innovation of the State of California pursuant to California Code of Regulations, title 10, section 260.237, subdivision (b) (3).

Fee Deduction:

Advisory fees may be deducted directly from client accounts by the qualified custodian, but only after the client provides written authorization. The qualified custodian provides statements directly to clients at least quarterly, showing all holdings, transactions, and fee deductions. In addition, SR99 Advisors provides clients with a quarterly billing statement (via email or U.S. mail) detailing the method of fee calculation, assets under management (AUM) and the period covered.

Alternate Payment Methods:

Clients may also pay advisory fees by check, credit card, or through approved third-party processors such as Square or Venmo. These payments occur outside of the client's custodial account and do not provide SR99 Advisors with access to or control over client's funds. Clients are strongly encouraged to compare the statements they receive from SR99 Advisors with the account statements received directly from the qualified custodian.

ITEM 16: INVESTMENT DISCRETION

SR99 Advisors manages client accounts on a discretionary basis, which means we may buy and sell securities on behalf of clients without prior approval for each individual transaction. Discretionary authority is exercised only after the client signs and executes a Safe Harbor

Limited Power of Attorney (LPOA) or engagement agreement, and in accordance with the client's Investment Policy Statement.

What is Safe Harbor (LPOA) in California?

A Safe Harbor Limited Power of Attorney (LPOA) is a written authorization that grants SR99 Advisors limited authority to place trades in a client account and to deduct client's advisory fees from a qualified custodian such as Charles Schwab or Vanguard etc. Importantly, this authority **does not** permit us to withdraw, transfer, or move clients' funds. SR99 Advisors follows the guidelines set forth from the State of California Department of Financial Protection and Innovation under California Code of Regulations, title 10, section 260.237, subdivision (b) (3). Thus, in good faith SR99 Advisors does hereby notify and request the following documents and procedures from its clients requesting investment discretion and fee deduction:

- A) The investment adviser has custody of the funds and securities solely because of its authority to make withdrawals from client accounts to pay its advisory fees.
- B) SR99 Advisors will request written authorization to deduct advisory fees from the account held with the qualified custodian.
- C) Each time a fee from SR99 Advisors is directly deducted from a client's custodian account, SR99 concurrently sends the custodian a statement depicting the amount of the fee to be deducted from the client's account inclusive of the formula used to calculate and the corresponding time period.
- D) SR99 Advisors does hereby notify the client and the California Commissioner that SR99 has or may have custody. SR99 intends to use the safeguard provisions in CCR, title 10, section 260.237, subdivision (b) (3) and any other applicable safeguard provisions afforded SR99 regarding discretionary trading authority and advisor fee deductions.

Payment Options:

Clients may elect to pay investment advisory fees via deduction by custodian, or through alternative methods such as credit card, personal check, or approved third-party processors (e.g., Square, Venmo), in compliance with applicable regulatory requirements.

Cross-Reference to Custody: For more information regarding custody, please see Item 15 of this Brochure.

ITEM 17: VOTING CLIENT SECURITIES

SR99 Advisors does not accept proxy voting authority currently. Clients retain the responsibility to vote proxies related to securities held in their accounts. We may provide advice upon request but do not participate in proxy voting. SR99 reserves the right to change its policy in the future with compliant notification.

ITEM 18: FINANCIAL INFORMATION

SR99 Advisors is financially stable and does not require or solicit prepayment of fees exceeding \$500 per client, six months or more in advance. We have no financial conditions that would impair our ability to meet contractual obligations to clients.

ITEM 19: Requirements for State-Registered Advisers

Matthew Fee is the CEO of SR99 Advisors. He has a B.S. Degree in Business Administration with a dual concentration in Finance and Real Estate. He has been a licensed California Real Estate Broker since 1992. He has passed the Series 65 North American Securities Administrators Association Uniform Investment Adviser Law Examination.

SR99 Advisor's does not get compensated for performance-based fees.

SR99 Advisor's has not been found liable in any arbitration claim.

SR99 Advisor's has not been found liable in any civil, self-regulatory organization or any administrative proceeding.

SR99 Advisor's does not have any relationship or an arrangement with any issuer of securities.