

PilotAI Wealth, LLC

A Wholly Owned Subsidiary of Livestream Technology Services Inc.

Form ADV Part 2A

Firm Brochure

October 19, 2026

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This brochure provides information about the qualifications and business practices of PilotAI Wealth, LLC. If you have any questions about the contents of this brochure, please contact us at 305-310-7814 or support@pilotaiwealth.com. 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. Registration as an investment adviser does not imply a certain level of skill or training. Additional information about PilotAI Wealth, LLC is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 — Material Changes

This brochure amends and replaces the Firm's brochure dated May 26, 2026. The Firm has revised its advisory program before commencing advisory operations. The material changes are summarized below. Clients and prospective clients should read the entire brochure.

- **Model portfolios.** The former three risk tiers (Conservative, Moderate and Aggressive Equity), each with Select, Moderate and Enhanced sub-tiers and a single thematic strategy per account, have been replaced by seven model portfolios: CE Core, CE Core Plus, ME Core, ME Core Plus, AE Core, AE Core Plus and AE Enhanced. Each model is constructed from multiple strategy components ("sleeves") rather than a single thematic strategy (Items 4 and 8).
- **Investment universe.** Portfolios are no longer limited to equity securities. Models may hold U.S.-listed equities, diversified equity ETFs, and approved fixed-income, commodity, inverse and (where specifically approved) leveraged exchange-traded products, subject to a combined 20% limit on leveraged and inverse products. Options, futures, directly held derivatives and margin remain prohibited (Items 4 and 8).
- **Cash.** The mandatory 10–12% structural cash allocation has been replaced by a minimum cash level of 2% of each model (Item 4).
- **Suitability questionnaire.** The 13-question, two-track questionnaire has been replaced by a 10-question scored questionnaire. The former "Track 2 / Qualified Client" framework, including its \$1,400,000 / \$2,700,000 thresholds, the AE-Qualified Maximum strategy and the Tier Override Request process, has been eliminated in its entirety (Item 4).
- **Enhanced Financial Capacity ("EFC").** The AE Enhanced model is available only to a client whose questionnaire result, after all hard stops, is AE Core Plus and who completes the Firm's EFC verification process (Item 4).
- **No client elections.** Clients may not elect a model different from the one assigned by the questionnaire. A change of model occurs only by retaking the questionnaire (Item 4).
- **Risk framework.** Volatility and maximum drawdown are now described as best-effort target boundaries, not guaranteed limits. Beta, Sortino ratio and similar measures are monitoring metrics, not compliance-locked parameters. Enforceable pre-trade limits are described in Item 8.
- **Technology provider and trading.** The Firm uses ATTIX, an unaffiliated technology provider, to compute proposed model portfolios and rebalances. The Firm retains investment discretion and screens every proposal before any order is sent to the custodian. Portfolios are evaluated every trading day and may trade on any trading day (Items 8, 10 and 12).
- **Fees.** The fee is unchanged at 2.50% annually but is now accrued each trading day on the prior business day's closing account value, rather than on average daily value (Item 5). The fee also does not include the internal expenses of ETFs and other exchange-traded products held in the account (Item 5).
- **Taxable accounts.** Additional disclosure has been added regarding the tax consequences of daily evaluation and rebalancing in taxable accounts (Item 8).
- **Account types.** The Firm offers taxable accounts only and does not offer retirement accounts or accept ERISA plan assets (Item 7).
- **Parent company subscription service.** Disclosure has been added about a separate trade-signal subscription service operated by the Firm's parent company, Livestream, and the related conflicts of interest (Item 10).

- **Promoters.** The Firm's promoter program is limited to unaffiliated promoters compensated by the Firm. Some promoters are also independent contractors of the Firm's parent company, Livestream (Item 14).

Clients may request a copy of this brochure at any time, free of charge, by contacting the Firm at 305-310-7814 or support@pilotaiwealth.com.

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Item 4 — Advisory Business

A. Firm Description

PilotAI Wealth, LLC ("PilotAI Wealth," "the Firm," "we," "our," or "us") is a limited liability company organized under the laws of the State of Delaware. The Firm is a wholly owned subsidiary of Livestream Technology Services Inc. ("Livestream"). Herman Edwin Cruz, the principal owner of Livestream, is the Firm's indirect principal owner and its Chief Executive Officer. The Firm's principal place of business is 701 Brickell Avenue, Miami, Florida 33131. PilotAI Wealth was organized on March 24, 2025, and has been registered with the SEC as an investment adviser since June 25, 2026.

PilotAI Wealth is registered with the United States Securities and Exchange Commission ("SEC") as an investment adviser. The Firm registered in reliance on Rule 203A-2(c) under the Investment Advisers Act of 1940 (the "Advisers Act"), which permits an adviser that reasonably expects to become eligible for SEC registration within 120 days to register before becoming eligible. The Firm intends to rely on the internet adviser exemption under Rule 203A-2(e) once its interactive website is operational and the Firm is providing ongoing digital investment advisory services to more than one client through that website.

The Firm provides and will provide investment advice to all of its clients exclusively through its interactive website. The Firm does not maintain a place of business for the purpose of meeting with clients and does not provide investment advice by telephone, email, chat, video, in person, or any other means outside the interactive website. Firm personnel may assist clients with administrative, operational and technical matters, such as account access, onboarding steps, document uploads, funding, and website navigation, but do not provide individualized investment advice.

B. Types of Advisory Services

The Firm offers discretionary investment management services through its interactive website. The Firm manages each client account according to one of seven model portfolios under a pre-established, rules-based model approved by the Firm's Investment Committee. The Firm does not offer financial planning, tax advice, legal advice, or other consulting services.

The seven model portfolios are organized into three families. Within each family, the Core and Core Plus models share the same operating volatility target, while the Core Plus model permits greater concentration in individual strategy components. Their outer volatility and drawdown target boundaries differ as described in Item 8.

Position	Model Portfolio	Family
1	CE Core	Conservative Equity (CE)
2	CE Core Plus	Conservative Equity (CE)
3	ME Core	Moderate Equity (ME)
4	ME Core Plus	Moderate Equity (ME)
5	AE Core	Aggressive Equity (AE)
6	AE Core Plus	Aggressive Equity (AE)
7	AE Enhanced	Aggressive Equity (AE) — available only through EFC (see Section D below)

Although the model families use the names "Conservative Equity," "Moderate Equity" and "Aggressive Equity," the models are not limited to equity securities. Each model may hold the types of securities described in Item 8, including certain fixed-income, commodity, inverse and leveraged exchange-traded products. The family names describe each model's relative risk level, not the exclusive content of the portfolio.

Each model is built from multiple strategy components, referred to as "sleeves." A sleeve is a group of securities selected under a defined set of rules. The Firm combines sleeves into a single blended portfolio for each model, subject to the limits described in Item 8.

C. Client Onboarding and Model Assignment

Every client completes the Firm's suitability questionnaire on the interactive website. The questionnaire contains 10 scored questions in three categories, weighted as follows:

Category	Weight
Time Capacity	35%
Financial Capacity	25%
Behavioral Risk	40%

The client's answers produce a numerical score ("Risk Points"). Risk Points determine the client's base model as follows:

Risk Points	Position	Model Portfolio
480 – 719	1	CE Core
720 – 959	2	CE Core Plus
960 – 1,199	3	ME Core
1,200 – 1,439	4	ME Core Plus
1,440 – 1,679	5	AE Core
1,680 – 1,920	6	AE Core Plus
No score range	7	AE Enhanced — EFC only

Hard stops. Certain answers limit the highest model a client may be assigned, regardless of the client's total score. A hard stop cannot be overridden by the client or waived by the Firm, including its Investment Committee. Where more than one hard stop applies, the most restrictive applies.

Condition	Highest Model Permitted
Client age 75 or older	Position 2 — CE Core Plus
Investment time horizon of less than three years	Position 2 — CE Core Plus
Client indicates it is very likely they will need to withdraw a significant portion of the account (liquidity question)	Position 2 — CE Core Plus
Client indicates they would sell most or all of their investments in a significant market decline	Position 3 — ME Core
Client indicates it is somewhat likely they will need to withdraw a significant portion of the account (liquidity question)	Position 4 — ME Core Plus
Client indicates a maximum loss tolerance of 20% or less	Position 4 — ME Core Plus
Answers to the loss-tolerance and market-decline questions remain inconsistent after the client is given one opportunity to review them	Position 4 — ME Core Plus
Client age 65 to 74	Position 5 — AE Core
No completed EFC election	Position 6 — AE Core Plus

The assigned model is binding. The client's account is managed according to the model produced by the questionnaire after all hard stops are applied. Clients may not elect a different model, either more conservative or more aggressive. A client whose circumstances or preferences change may retake the questionnaire, and the account will be assigned to the model produced by the new result.

Tailoring and restrictions. The Firm tailors its services to each client only through the model assigned by the questionnaire. The Firm does not otherwise customize a client's portfolio, and clients cannot currently impose restrictions on specific securities or types of securities (see Item 16).

D. Enhanced Financial Capacity (EFC) and the AE Enhanced Model

AE Enhanced (Position 7) has no questionnaire score range and cannot be reached through the questionnaire alone. A client may be assigned to AE Enhanced only if all of the following conditions are met:

- the client's final base model, after all hard stops, is AE Core Plus (Position 6);
- the client's Cumulative Net Client Funding (the client's total deposits into the PilotAI Wealth account, less withdrawals) is no more than 25% of the client's Documented Outside Investable Assets (defined below), as those terms are defined in the Firm's EFC procedures;
- the client provides the required documentation and it is verified;
- the client's funding is reconciled to the amount used in the EFC determination;
- the client completes the required acknowledgments; and

- the client affirmatively elects AE Enhanced.

"Documented Outside Investable Assets" means the value of the client's assets held in brokerage, retirement or cash accounts outside PilotAI Wealth, as shown on account statements accepted by the Firm. The client's PilotAI Wealth account is excluded. Self-reported investable assets or net worth are not used.

To establish Documented Outside Investable Assets, the client must upload one or more brokerage, retirement or cash-account statements for accounts held outside PilotAI Wealth. Each statement must be dated within 90 days of the EFC determination and must show the client as the individual owner or as a named owner of a joint account. For a jointly titled account, the client must also provide an EFC ownership attestation confirming that the client is a named owner and that the assets may be considered. A PilotAI Wealth account statement cannot be used. A Firm reviewer confirms the ownership, statement date and value shown on each statement against these fixed criteria; the reviewer does not exercise judgment about the client's model, and eligibility is determined by the Firm's rules.

Eligibility for AE Enhanced is subject to the Firm's continuing EFC requirements. If the client's ratio later exceeds 25%, the Firm will provide the notice and cure period described in its EFC procedures; if eligibility is not restored within that period, the account will no longer be eligible for AE Enhanced and will be subject to the Firm's model-change and acknowledgment procedures. EFC can move a client only one position, from AE Core Plus to AE Enhanced. EFC has no effect on Positions 1 through 5 and cannot override a hard stop.

E. Changes of Model

When a retaken questionnaire produces a different model, the Firm notifies the client through the website before the change is implemented. Because a change of model may involve selling securities and may have tax consequences, the client is encouraged to consult a tax professional or other financial adviser of the client's choosing, and is asked to acknowledge the change electronically. Whether the new model is more aggressive or more conservative, the change is implemented only after the client provides that acknowledgment.

F. Wrap Fee Program

The Firm sponsors a wrap fee program. The Firm's single annual fee covers investment advisory services, trade execution, custody through the Firm's qualified custodian, technology platform access, compliance monitoring and account administration. The wrap fee program is described in the Firm's separate Wrap Fee Program Brochure (Form ADV Part 2A, Appendix 1), which is delivered to clients with this brochure. All of the Firm's client accounts are managed in this wrap fee program; the Firm does not manage accounts outside it. The Firm receives the wrap fee for its services as sponsor and portfolio manager and pays the cost of the services the wrap fee covers, including Apex's execution and custody services.

G. Cash

Each model maintains a minimum cash allocation of 2% of account value. This is a minimum, not a target; actual cash may be higher at times, for example when a position is reduced to comply with a limit described in Item 8 or when new funds have not yet been invested. Cash is held through the cash sweep program of the Firm's qualified custodian, Apex Clearing Corporation ("Apex"). Apex pays interest on swept cash at a variable rate that Apex determines and may change at any time. The Firm does not control, set or guarantee the rate and receives no portion of the interest or of any revenue Apex earns on swept cash.

Advisory fee on cash. The Firm's advisory fee is charged on total account value, including cash. When the interest paid on cash is lower than the advisory fee rate, the client pays more in fees on the cash portion than the cash earns.

H. Assets Under Management

As of the date of this brochure, the Firm had no regulatory assets under management.

Item 5 — Fees and Compensation

A. Fee Schedule

The Firm charges a single annual wrap fee of 2.50% of account value. The fee covers:

- discretionary investment advisory services;
- trade execution through the qualified custodian;
- custody and account administration;
- technology platform access and maintenance; and
- compliance monitoring and suitability reviews.

The Firm does not charge commissions, ticket charges, account maintenance fees or technology fees in addition to the wrap fee.

B. Negotiated Fees

Fees are negotiable. The Firm generally considers a reduced fee for accounts of \$1,000,000 or more but may negotiate fees for other accounts in its discretion. Any reduced fee must be approved by the Firm's Chief Executive Officer, its Chief Compliance Officer or its Operations Manager, and is stated in the client's Investment Advisory Agreement. Because fees are negotiable, some clients may pay less than others for the same services. Any change to a client's fee after signing requires a signed amendment to the Investment Advisory Agreement.

C. Fee Calculation and Billing

The fee accrues on each trading day. The daily accrual equals the annual fee rate divided by 252, multiplied by the account's closing value on the prior business day ($2.50\% \div 252 \times \text{prior-day closing value}$). The fee base is total account value, including cash. The Firm will accrue the fee for no more than 252 trading days in any calendar year.

Accrued fees are billed monthly in arrears and are deducted directly from the client's account by Apex. Clients authorize this deduction in their Investment Advisory Agreement. The Firm provides clients with fee information for each billing period, including the fee amount and the period covered. Clients should compare it with the statements they receive from Apex.

D. Other Fees and Expenses

The wrap fee does not cover the following, which are paid by the client in addition to the wrap fee:

- **Fund expenses.** ETFs and other exchange-traded products held in client accounts pay their own management fees and operating expenses, which are reflected in the product's price. These expenses are in addition to the Firm's fee. Leveraged, inverse and commodity products generally have higher expenses than broad-market equity ETFs.
- **Regulatory fees** such as SEC fees or FINRA transaction activity fees, if applicable.
- **Wire transfer fees** charged by the custodian.
- **Account transfer (ACAT) fees** if a client transfers an account away from the custodian.
- **Other custodian charges** for services outside the program, as set out in the custodian's fee schedule.

The Firm receives no portion of these fees.

E. Prepayment and Refunds

Fees are billed in arrears, so no fees are prepaid. If the Investment Advisory Agreement is terminated during a billing period, the fee is accrued only through the termination date. No penalty is charged for termination.

F. Compensation for Sale of Securities

Neither the Firm nor any of its supervised persons receives compensation for the sale of securities or other investment products. The Firm's only advisory compensation is the wrap fee.

G. Wrap Fee Considerations

Under a wrap fee program, clients may pay more or less than they would if they paid separately for advisory services, brokerage, custody and other services. Whether the wrap fee is advantageous depends on factors such as account size, trading frequency and the cost of the component services elsewhere.

Because the wrap fee covers transaction costs, the Firm bears the cost of trading and may have an incentive to trade less. The Firm reduces this conflict because trades are generated under the pre-established, rules-based model approved by the Investment Committee. The Firm may stop or reject a proposed rebalance only under its documented override procedures (for example, for a data or system error, a limit breach, or a market or operational disruption); any override must be approved by the Chief Executive Officer, Chief Compliance Officer or Operations Manager and is recorded and reviewed. Portfolios are evaluated every trading day and may trade on any trading day when the model's rules call for a change. See Items 8 and 12.

Item 6 — Performance-Based Fees and Side-by-Side Management

The Firm does not charge performance-based fees and does not manage accounts that pay performance-based fees alongside other accounts. The Firm's only advisory compensation is the asset-based wrap fee described in Item 5.

Item 7 — Types of Clients

The Firm provides investment advisory services to individuals, high-net-worth individuals, trusts, estates and other entities through its interactive website. The Firm's services are currently available only to U.S. persons.

The minimum account size is \$20,000. The Firm may waive or reduce the minimum in its discretion. A waiver must be approved by the Firm's Chief Executive Officer, Chief Compliance Officer or Operations Manager.

All clients must complete the suitability questionnaire and sign the Firm's Investment Advisory Agreement before the Firm manages their account. Clients must also complete the custodian's account documentation, including Know Your Customer, anti-money laundering and identity verification procedures.

The Firm currently offers taxable accounts only. It does not offer Individual Retirement Accounts or other retirement accounts and does not accept assets of employee benefit plans subject to the Employee Retirement Income Security Act of 1974 (ERISA).

Item 8 — Methods of Analysis, Investment Strategies and Risk of Loss

A. Methods of Analysis

The Firm manages client accounts using a pre-established, rules-based model. The Firm's Investment Committee approves the model methodology, the securities eligible for use, the sleeve structure, the limits described below, the rebalancing rules and any changes to them.

The Firm uses technology, including artificial-intelligence and quantitative tools, at the firm level in research and in developing and selecting strategy components and model parameters. Individual client accounts are not managed by artificial intelligence. Each client account is managed according to its assigned model under the pre-established rules approved by the Investment Committee.

Technology provider. The Firm uses ATTIX, an unaffiliated technology provider, to operate the portfolio-construction system. Each trading day, ATTIX's system evaluates each model and may produce a proposed model portfolio or rebalance within the methodology approved by the Firm. A proposal is an input to the Firm; it is not an order. The Firm tests every proposal against its pre-trade limits and decides whether orders are generated. ATTIX does not have discretionary authority over client accounts, does not transmit orders to the custodian, and does not receive clients' personal information. The Firm can stop, reject or override any proposal under its documented override procedures (see Item 5.G).

B. Investment Strategies

Eligible securities. The Firm uses only securities on its approved instrument list, which includes:

- individual equity securities listed on U.S. exchanges;
- diversified equity exchange-traded funds (ETFs);
- approved fixed-income ETFs;
- approved commodity ETFs and exchange-traded products;
- approved inverse ETFs;
- leveraged ETFs, only if specifically included on the approved list; and
- the custodian's cash sweep program.

Models may hold securities of companies that are not currently profitable. The Firm does not use options, futures or other directly held derivatives, mutual funds, private placements or other alternative investments, and does not borrow on margin. Some leveraged and inverse ETFs themselves use derivatives to achieve their objectives.

Rebalancing. Each model is evaluated every trading day. A rebalance is generally triggered when a portfolio's holdings drift 5% from the model's targets, or when the model's rules otherwise call for a change. Evaluation does not mean every portfolio trades every day. A rebalance may involve one sleeve, several sleeves or all sleeves of a model. Whichever sleeves are rebalanced, the Firm's pre-trade limits are applied to the final blended portfolio before any order is generated.

New money and withdrawals. Additional funds deposited into an existing account are invested in proportion to the account's current model. Client withdrawals and contributions are not blocked by the Firm's pre-trade

limits; if a cash flow causes a portfolio to move outside a limit, the condition is corrected through subsequent rebalancing.

Pre-trade limits. The following limits are enforced before any order reaches the custodian. If a proposed position would exceed a limit, the position is reduced and the excess is held in cash.

Limit	CE Core	CE Core Plus	ME Core	ME Core Plus	AE Core	AE Core Plus	AE Enhanced
Single stock or concentrated ETF (max.)	6%	6%	7%	7%	8%	8%	8%
Single diversified ETF (max.)	25%	25%	25%	25%	25%	25%	25%
Single sleeve (max.)	20%	25%	20%	28%	20%	25%	30%
Leveraged and inverse products, combined (max.)	20%	20%	20%	20%	20%	20%	20%
Cash (min.)	2%	2%	2%	2%	2%	2%	2%

In addition, each sleeve must hold at least five securities, and no single security may exceed 40% of its sleeve. Total invested positions may not exceed 100% of account value, and margin borrowing is prohibited. A diversified ETF is tested as a single position; its underlying holdings are not looked through for the single-stock limit. A single-stock ETF or other ETF the Firm designates as concentrated is subject to the single-stock limit.

Volatility and drawdown target boundaries. Each model is managed with the objective of staying within the following outer boundaries. These are best-effort target boundaries, not guaranteed limits. Volatility and drawdown depend on future market movements, which cannot be predicted or blocked in advance, and a model may exceed its boundaries.

Model	Annualized Volatility — Up To	Maximum Drawdown — Up To
CE Core	13%	12%
CE Core Plus	15%	15%
ME Core	19%	18%
ME Core Plus	23%	22%
AE Core	27%	26%
AE Core Plus	32%	30%
AE Enhanced	38%	35%

The CE, ME and AE Core and Core Plus models are managed toward lower operating volatility targets of approximately 9.5%, 15% and 22%, respectively. These operating targets are not limits.

Monitoring metrics. The Firm also monitors beta, Sortino and Sharpe ratios, sector exposure, liquidity and turnover. These are monitoring metrics only and are not limits.

Investment Committee. The Investment Committee approves the rules under which the system operates and reviews model parameters at least quarterly. Model parameters may be changed only by the Investment Committee through the Firm's documented change-control process, and a change that affects this brochure requires an amendment to it. The Investment Committee does not make individual client-level investment

decisions and may not waive, for an individual client or transaction, any control designated as non-overridable, including the suitability hard stops, the EFC requirements for AE Enhanced, the prohibition on margin and the prohibition on non-approved securities.

C. Risk of Loss

Investing in securities involves risk of loss that clients should be prepared to bear, including the loss of their entire investment. Clients should consider the following risks:

- **Market risk.** The value of securities may decline because of general market conditions, economic factors, political events or other developments.
- **Equity risk.** Equity securities can experience significant price fluctuations, particularly in the AE family.
- **Concentration and sleeve risk.** Sleeves may be concentrated in particular sectors, industries, themes or company sizes. Core Plus models and AE Enhanced permit greater concentration than Core models and may experience larger losses.
- **Leveraged and inverse product risk.** Leveraged and inverse ETFs seek a multiple, or the opposite, of an index's return for a single day. Held longer than one day, their returns can differ significantly from the multiple or inverse of the index's return, particularly in volatile markets, and they can lose value even when the index moves in the expected direction. These products can lose value rapidly and use derivatives internally.
- **Fixed-income product risk.** Fixed-income ETFs are subject to interest-rate risk, credit risk and other risks. Their prices generally fall when interest rates rise.
- **Commodity product risk.** Commodity ETFs and exchange-traded products can be highly volatile and are affected by supply and demand, geopolitical events and, for products using futures, roll costs. Some commodity products are structured as grantor trusts or partnerships and may have different tax treatment.
- **Unprofitable-company risk.** Models may hold companies that are losing money. These securities can be more volatile, more sensitive to changes in financing conditions, and more likely to suffer large or permanent losses than securities of profitable companies.
- **Small-company risk.** Securities of smaller companies may be more volatile and less liquid than those of larger companies.
- **Model and target-boundary risk.** The volatility and drawdown boundaries are objectives, not guarantees. A model may experience volatility or losses greater than its boundaries.
- **Frequent trading risk.** Portfolios are evaluated daily and may trade on any trading day, which may increase turnover.
- **Tax risk in taxable accounts.** Trading and rebalancing may generate taxable gains, including short-term capital gains taxed at ordinary income rates, and may trigger the wash-sale rules. The Firm does not provide tax-loss harvesting, does not manage wash sales, and does not take a client's individual tax circumstances into account; accounts in the same model are managed under the same rules regardless of each client's tax situation. The Firm does not provide tax advice. Clients should consult their own tax professional.
- **Cash risk.** Cash held in the account may reduce returns in rising markets, and the advisory fee on cash may exceed the interest it earns.
- **Technology, data and vendor risk.** The Firm relies on its own platform, on ATTIX's portfolio-construction system and on the custodian's systems. System failures, coding errors, incorrect or delayed data, or service interruptions could result in delayed or incorrect portfolio actions.
- **Limited operating history.** The Firm and its models do not have a track record of managing client accounts.

There is no guarantee that any model will achieve its objectives or that clients will not experience losses.

Item 9 — Disciplinary Information

The Firm has no legal or disciplinary events to disclose.

Item 10 — Other Financial Industry Activities and Affiliations

A. Financial Industry Activities

Neither the Firm nor any of its management persons is registered, or has an application pending to register, as a broker-dealer, registered representative of a broker-dealer, futures commission merchant, commodity pool operator, commodity trading advisor, or an associated person of any of them.

B. Material Relationships

Livestream. PilotAI Wealth is a wholly owned subsidiary of Livestream Technology Services Inc., a technology services company. The Firm's technology platform was developed using resources provided by Livestream. Livestream does not charge clients any separate technology, licensing or platform fee. Herman Edwin Cruz is the Chief Executive Officer of both the Firm and Livestream. This creates a conflict of interest because Mr. Cruz has a financial interest in both companies. Livestream does not charge clients any separate fee; as the Firm's owner, however, Livestream benefits from the Firm's revenue, including the advisory fees clients pay. The Firm addresses this conflict by charging a single wrap fee with no separate fees payable to Livestream, and through the Chief Compliance Officer's oversight of the Firm's dealings with Livestream.

Livestream subscription service. Livestream also operates a separate subscription service through which members pay a membership fee to receive trade signals. The subscription service is not part of the Firm's advisory services, and the Firm does not use its signals in managing client accounts. Members are not required to open an account with the Firm, and the Firm's clients are not required to subscribe. The Firm may make its services known to subscription members, and promoters may refer subscription members to the Firm. This creates a conflict of interest because Livestream, as the Firm's owner, benefits from both membership fees and the Firm's advisory fees and therefore has an incentive to encourage members to become clients. Securities that are the subject of subscription-service signals may also be held in the Firm's model portfolios. The Firm addresses these conflicts by managing all client accounts under the pre-established, rules-based models approved by its Investment Committee, independently of the subscription service's signals, and through the Chief Compliance Officer's oversight of the Firm's dealings with Livestream.

ATTIX. ATTIX is an unaffiliated technology provider compensated by the Firm, from the Firm's own revenue, for services provided to the Firm. ATTIX receives no compensation from clients and does not share in the Firm's advisory fees. Neither the Firm, Livestream nor Mr. Cruz has any ownership interest in ATTIX, and ATTIX has no ownership interest in the Firm, Livestream or their affiliates.

A representative of ATTIX may attend meetings of the Firm's Investment Committee in a non-voting, advisory capacity to provide technical information about the portfolio-construction system. ATTIX does not vote on Investment Committee decisions, including decisions about ATTIX's own services.

The Firm does not recommend or select other investment advisers for its clients and does not receive compensation from other advisers.

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

A. Code of Ethics

The Firm has adopted a Code of Ethics under Rule 204A-1 of the Advisers Act. The Code sets standards of business conduct for all supervised persons, including requirements relating to confidentiality of client information, prohibitions on insider trading, restrictions on personal securities transactions, and reporting of personal holdings and transactions. Supervised persons must acknowledge receipt of the Code and certify compliance at least annually. The Firm will provide a copy of the Code to any client or prospective client on request.

B. Personal Trading

Supervised persons may buy or sell for their own accounts securities that are the same as or similar to securities held in client accounts. This creates a potential conflict of interest. The Firm addresses it through its Code of Ethics, which requires access persons to report holdings and transactions and to pre-clear certain transactions, and through review of those reports by the Chief Compliance Officer. Because client accounts are managed under pre-established rules applied to all accounts in the same model, the opportunity to trade ahead of client accounts is limited.

C. Accounts of Firm Personnel

Supervised persons and their family members may open advisory accounts with the Firm. These accounts complete the same onboarding process, are assigned to models by the same questionnaire and rules, are managed and traded under the same rules, and pay the same fee schedule as other client accounts. They receive no preferential treatment in model assignment, trading or allocation.

Item 12 — Brokerage Practices

A. Selecting Brokerage

The Firm has selected Apex Clearing Corporation ("Apex") as the qualified custodian and executing broker for all client accounts. Apex is registered with the SEC as a broker-dealer and is a member of FINRA and SIPC. The Firm's platform is integrated with Apex's AscendOS platform through application programming interfaces.

Clients must establish accounts with Apex and cannot direct the Firm to use a different broker-dealer or custodian, because the Firm's platform, portfolio management system and fee billing are integrated exclusively with Apex. As a result, the Firm may not be able to achieve the most favorable execution available from other broker-dealers, and clients may pay more than they would elsewhere.

The Firm selected Apex based on execution quality, custodial services, technology integration, regulatory standing, financial stability and overall cost to clients. The Firm reviews execution quality under its Best Execution Policy.

B. Order Transmission

Only the Firm transmits orders to Apex for client accounts, and only after a proposal has passed the Firm's pre-trade limits. ATIX never transmits orders to Apex.

C. Aggregation and Allocation

When orders are generated for multiple accounts, the Firm may aggregate them. Aggregated orders are allocated fairly and consistently among similarly situated accounts in the same model, subject to each account's cash, drift, restrictions and operational constraints. No account is systematically favored. Newly funded accounts may be excluded from a same-day rebalance.

D. Trade Errors

The Firm identifies and corrects trade errors in accordance with its Trade Error Policy.

E. Soft Dollars

The Firm does not use soft dollar arrangements and does not receive research or other products or services from Apex or any other broker-dealer in exchange for client brokerage. The Firm does not receive client referrals from Apex or any other broker-dealer and does not consider client referrals in selecting a broker-dealer.

Item 13 — Review of Accounts

A. Ongoing Review

Each model is evaluated every trading day, and client accounts are monitored for drift from model targets and for compliance with the Firm's limits. The Chief Compliance Officer or a designee reviews accounts and system activity at least quarterly to confirm that model assignments match each client's questionnaire result and that the system is operating within its approved parameters. The Investment Committee reviews model parameters at least quarterly.

B. Client Profile Updates

The Firm asks each client to review and update the suitability questionnaire at least annually. A client may also retake the questionnaire at any time if their circumstances change. A review may also be triggered by a significant market event or by updated information from the client.

C. Client Reports

Apex sends clients account statements at least quarterly, showing holdings, transactions and account value. Clients should review these statements carefully. The Firm also provides account information through its website; this information is supplemental and does not replace the custodial statements.

Item 14 — Client Referrals and Other Compensation

A. Economic Benefits from Third Parties

The Firm does not receive any economic benefit from a non-client for providing advisory services.

B. Compensation for Client Referrals

The Firm compensates unaffiliated promoters for referring clients, under written agreements that comply with Rule 206(4)-1 under the Advisers Act. Promoters are not employees of the Firm. A promoter is paid a percentage of the advisory fees the Firm receives from referred clients. The Firm pays promoters from its own revenue; promoter compensation does not increase the fee paid by the client. Promoters have an incentive to refer clients to the Firm because they are paid for doing so. Some promoters are also independent contractors of Livestream, the Firm's parent company, and may be compensated by Livestream for other services, including the sale of Livestream subscription memberships. This relationship gives those promoters an additional incentive to refer clients to the Firm. It is described in the promoter disclosure provided to prospective clients at the time of the endorsement.

Promoters may only introduce prospective clients to the Firm's website. They may not provide investment advice, recommend a model, interpret or suggest answers to the questionnaire, or encourage a client to seek a more aggressive model. The required promoter disclosure is provided clearly and prominently at the time the testimonial or endorsement is disseminated.

Item 15 — Custody

Client assets are held by Apex, a qualified custodian. The Firm does not hold client funds or securities. The Firm is deemed to have custody of client assets solely because it is authorized to have its advisory fee deducted directly from client accounts. Apex sends account statements directly to clients at least quarterly. Clients should review these statements carefully and compare them with any information the Firm provides.

Item 16 — Investment Discretion

The Firm manages all client accounts on a discretionary basis. Through the Investment Advisory Agreement, clients authorize the Firm to determine the securities to buy and sell and the amounts, without obtaining the client's consent for each transaction. The Firm exercises this authority only within the client's assigned model, the rules approved by the Investment Committee and the limits described in this brochure. ATTIX does not have discretionary authority over client accounts.

Clients cannot currently impose restrictions on specific securities or types of securities or otherwise customize their portfolio. A client who is not willing to accept the holdings of the assigned model should consider whether the Firm's services are appropriate.

Item 17 — Voting Client Securities

The Firm does not vote proxies for clients and does not advise clients on proxy voting. Clients receive proxy materials and other corporate-action communications directly from Apex or the issuer and are responsible for voting their own proxies.

Item 18 — Financial Information

The Firm does not require or solicit prepayment of more than \$1,200 in fees per client six months or more in advance. The Firm is not aware of any financial condition reasonably likely to impair its ability to meet its commitments to clients. The Firm has not been the subject of a bankruptcy petition during the past ten years.