

PilotAI Wealth, LLC

A Wholly Owned Subsidiary of Livestream Technology Services Inc.

Wrap Fee Program Brochure

Form ADV Part 2A, Appendix 1

October 19, 2026

701 Brickell Avenue

Miami, Florida 33131

305-310-7814 · support@pilotaiwealth.com · PilotAIwealth.com

CRD Number: 337297 SEC File Number: 801-134131

This wrap fee program brochure provides information about the qualifications and business practices of PilotAI Wealth, LLC and the PilotAI Wealth wrap fee program. 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 Wrap Fee Program Brochure dated May 26, 2026. The Firm has revised its program before commencing advisory operations. The material changes are:

- The former three-tier, single-strategy structure has been replaced by seven model portfolios built from multiple strategy components (Item 4).
- Models may hold approved fixed-income, commodity, inverse and leveraged exchange-traded products in addition to equities, subject to a combined 20% limit on leveraged and inverse products (Item 6).
- The 10–12% structural cash allocation has been replaced by a 2% minimum cash level (Item 4).
- The former Track 2 / Qualified Client framework has been eliminated; the AE Enhanced model is available only through the Firm's Enhanced Financial Capacity process (Item 4).
- The fee remains 2.50% annually but now accrues each trading day on the prior business day's closing value (Item 4).
- The brochure now states that the internal expenses of ETFs and other exchange-traded products are not covered by the wrap fee (Item 4).
- The Firm uses ATTIX, an unaffiliated technology provider, to compute proposed portfolios; the Firm retains discretion and controls all trading (Item 6).
- The 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 4).
- The Firm offers taxable accounts only and does not offer retirement accounts or accept ERISA plan assets (Item 5).
- 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 9).

Item 3 — Table of Contents

- Item 2 — Material Changes
- Item 3 — Table of Contents
- Item 4 — Services, Fees and Compensation
- Item 5 — Account Requirements and Types of Clients
- Item 6 — Portfolio Manager Selection and Evaluation
- Item 7 — Client Information Provided to Portfolio Managers
- Item 8 — Client Contact with Portfolio Managers
- Item 9 — Additional Information

Item 4 — Services, Fees and Compensation

A. Services

PilotAI Wealth, LLC ("PilotAI Wealth," "the Firm," "we" or "us") sponsors and is the portfolio manager for the PilotAI Wealth wrap fee program (the "Program"). Through the Program, the Firm provides discretionary investment management exclusively through its interactive website. The Firm does not provide investment advice by telephone, email, chat, video, in person or any other means outside the website.

Each client completes the Firm's 10-question suitability questionnaire. The result, after any hard stops, assigns the client's account to one of seven model portfolios: CE Core, CE Core Plus, ME Core, ME Core Plus, AE Core, AE Core Plus or AE Enhanced. AE Enhanced is available only through the Firm's Enhanced Financial Capacity ("EFC") process. The Firm manages the account according to the assigned model under a pre-established, rules-based model approved by its Investment Committee. Clients may not elect a different model; a change of model occurs only by retaking the questionnaire. If a questionnaire retake results in a different model assignment, the change is implemented only after the client electronically acknowledges the new assignment and the applicable disclosure, whether the new model is more aggressive or more conservative. The models, the questionnaire, the hard stops and the EFC process are described in Item 4 of the Firm's Form ADV Part 2A brochure, which is incorporated by reference and delivered with this brochure.

Each model maintains a minimum cash allocation of 2%, held in the cash sweep program of Apex Clearing Corporation ("Apex"), the Program's qualified custodian and executing broker. Apex pays interest on swept cash at a variable rate it determines. PilotAI Wealth does not receive any portion of the interest paid on client cash or any revenue Apex earns in connection with the cash sweep program.

B. Program Fee

Clients pay a single annual wrap fee of 2.50% of account value. The fee covers the Firm's investment advisory services and the ordinary trade execution, custody, account administration, technology platform access and compliance monitoring provided as part of the Program, subject to the additional expenses described in Section D below. The Firm does not charge commissions or ticket charges for Program trades.

The fee accrues each trading day at $2.50\% \div 252$ of the account's closing value on the prior business day, and is accrued for no more than 252 trading days in a calendar year. The fee is charged on total account value, including cash. Fees are billed monthly in arrears and deducted from the account by Apex. If the Program is terminated during a month, the fee accrues only through the termination date. No penalty is charged for termination.

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, Chief Compliance Officer or Operations Manager and is stated in the client's Investment Advisory Agreement.

Advisory fee on cash. Because the fee applies to cash, when the interest Apex pays on cash is lower than the fee rate, the client pays more in fees on the cash portion than the cash earns.

C. Cost Comparison

The Program may cost the client more or less than purchasing the services separately. Factors that bear on this include the account size, the amount of trading in the account, the fees the client would otherwise pay for advice, brokerage and custody, and whether the client could obtain those services separately at lower cost. Portfolios in the Program are evaluated every trading day and may trade on any trading day. A client in an account with little trading may pay more under the wrap fee than if paying for services separately.

D. Fees Not Covered by the Program

In addition to the wrap fee, clients bear:

- the internal management fees and operating expenses of ETFs and other exchange-traded products held in the account, which are reflected in the product's price (leveraged, inverse and commodity products generally have higher expenses);
- regulatory transaction fees, if applicable;
- wire transfer fees;
- account transfer (ACAT) fees; and
- other Apex charges for services outside the Program.

The Firm receives no portion of these fees.

E. Compensation to Persons Who Refer Clients

The Firm compensates unaffiliated promoters who refer clients to the Program. 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 client's fee. Because promoters are paid for referrals, they have an incentive to refer clients to the Program. Promoters may not provide investment advice, recommend a model or suggest questionnaire answers. The required promoter disclosure is provided clearly and prominently at the time the testimonial or endorsement is disseminated. 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 Program and is described in the promoter disclosure.

Firm personnel are not compensated based on the number of clients enrolled in the Program or the model a client is assigned.

Item 5 — Account Requirements and Types of Clients

The Program is available to individuals, high-net-worth individuals, trusts, estates and other entities that are U.S. persons. The minimum account size is \$20,000. The Firm may waive or reduce the minimum in its discretion.

Clients must complete the suitability questionnaire, sign the Investment Advisory Agreement and complete Apex's account documentation, including identity verification, before the Firm manages the account. The Program currently offers taxable accounts only. The Firm does not offer Individual Retirement Accounts or other retirement accounts and does not accept assets of employee benefit plans subject to ERISA.

Item 6 — Portfolio Manager Selection and Evaluation

A. Selection of Portfolio Managers

The Firm is the only portfolio manager in the Program. The Firm does not select or recommend other portfolio managers. Because the Firm acts as both sponsor and portfolio manager, it has a conflict of interest: it does not compare its own management against outside portfolio managers, and the fee for the Program is paid to the Firm. Performance information about the Program's models is not calculated by, or reviewed by, a third party, and is not calculated under a uniform presentation standard.

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 portfolio or rebalance within the methodology approved by the Firm's Investment Committee. A proposal is not an order. The Firm tests every proposal against its pre-trade limits and decides whether orders are generated. ATTIX has no discretionary authority over client accounts and never transmits orders to Apex. The Firm can stop, reject or override any proposal under its documented override procedures; any override must be approved by the Chief Executive Officer, Chief Compliance Officer or Operations Manager and is recorded. An ATTIX representative may provide technical information to the Firm's Investment Committee in a non-voting advisory capacity but has no authority to approve Firm investment decisions. The Firm compensates ATTIX from its own revenue, and ATTIX receives no compensation from clients. The Firm oversees ATTIX as a service provider.

B. Advisory Business, Methods and Risks

The following describes the Firm's services as portfolio manager. More detail is provided in the Firm's Form ADV Part 2A brochure.

Types of services. Discretionary management of each account according to one of seven model portfolios, exclusively through the interactive website. The Firm does not provide financial planning, tax or legal advice.

Client restrictions. Clients cannot currently impose restrictions on specific securities or types of securities or otherwise customize their portfolios.

Assets under management. As of October 19, 2026, the Firm had no regulatory assets under management.

Performance-based fees. The Firm does not charge performance-based fees.

Methods of analysis and investment strategies. Each model is built from multiple strategy components ("sleeves") combined into a single blended portfolio. Models may hold U.S.-listed equities, diversified equity ETFs, and approved fixed-income, commodity, inverse and (if specifically approved) leveraged exchange-traded products, plus cash. Models may hold securities of companies that are not currently profitable. The Firm does not use options, futures, directly held derivatives or margin. Portfolios are evaluated every trading day; a rebalance is generally triggered when holdings drift 5% from model targets or when the model's rules otherwise call for a change, and may involve one, several or all sleeves. New deposits are invested in proportion to the account's current model.

Before any order reaches Apex, the Firm enforces these limits on the blended portfolio; a position that would exceed a limit is reduced and the excess held in cash: single stock or concentrated ETF — 6% (CE models), 7% (ME models), 8% (AE models); single diversified ETF — 25%; single sleeve — 20% (CE Core), 25% (CE Core Plus),

20% (ME Core), 28% (ME Core Plus), 20% (AE Core), 25% (AE Core Plus), 30% (AE Enhanced); leveraged and inverse products combined — 20%; cash — at least 2%; at least five securities per sleeve with no security above 40% of its sleeve; no margin.

Each model is managed with the objective of staying within the following best-effort target boundaries, which are not guaranteed limits and may be exceeded:

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 Firm uses technology, including artificial-intelligence and quantitative tools, at the firm level in research and in developing strategy components and model parameters. Individual client accounts are managed according to their assigned model under pre-established rules.

Risk of loss. Investing involves risk of loss, including loss of the entire investment. Principal risks include market and equity risk; concentration risk, which is greater in Core Plus models and AE Enhanced; the risks of leveraged and inverse ETFs, whose returns over periods longer than one day can differ significantly from their stated objective; interest-rate and credit risk of fixed-income products; volatility of commodity products; the greater volatility of unprofitable companies; the risk that a model exceeds its target boundaries; technology, data and vendor risk; and tax consequences of trading in taxable accounts. The Firm does not offer tax-loss harvesting, does not manage wash sales, does not consider clients' individual tax circumstances and does not provide tax advice. These risks are described more fully in Item 8 of the Form ADV Part 2A brochure.

Voting client securities. The Firm does not vote proxies or advise clients on proxy voting. Clients receive proxy materials from Apex or the issuer.

Item 7 — Client Information Provided to Portfolio Managers

The Firm is the Program's only portfolio manager, and client information collected through the website is used by the Firm to assign and manage each account. The Firm does not provide clients' personal information to ATTIX. ATTIX's system operates at the model level and does not receive client names, account numbers, questionnaire answers or other nonpublic personal information.

Item 8 — Client Contact with Portfolio Managers

The Firm provides investment advice only through its interactive website. Clients may contact the Firm at any time at 305-310-7814 or support@pilotaiwealth.com for administrative, operational or technical assistance, but Firm personnel do not provide individualized investment advice outside the website. Clients do not have contact with ATTIX.

Item 9 — Additional Information

A. Disciplinary Information and Other Financial Industry Activities

The Firm has no legal or disciplinary events to disclose. Neither the Firm nor any of its management persons is registered, or has an application pending to register, as a broker-dealer or registered representative of a broker-dealer. The Firm is a wholly owned subsidiary of Livestream Technology Services Inc., a technology services company. Herman Edwin Cruz is Chief Executive Officer of both the Firm and Livestream, which creates a conflict of interest. Livestream charges clients no separate fee but, as the Firm's owner, benefits from the Firm's revenue. 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 Program, and the Firm does not use its signals in managing client accounts. The Firm may make the Program known to subscription members, and promoters may refer them. Because Livestream benefits from both membership fees and the Firm's revenue, it has an incentive to encourage members to become clients, and securities that are the subject of subscription signals may also be held in the Firm's models. The Firm addresses these conflicts by managing all accounts under its pre-established, rules-based models, independently of those signals, and through the Chief Compliance Officer's oversight of the Firm's dealings with Livestream (see Item 10 of the Form ADV Part 2A). ATTIX is unaffiliated with the Firm, Livestream and Mr. Cruz. A representative of ATTIX may attend Investment Committee meetings in a non-voting, advisory capacity and does not vote on Committee decisions.

B. Code of Ethics, Account Reviews, Referrals and Financial Information

Code of ethics and personal trading. The Firm has adopted a Code of Ethics under Rule 204A-1 governing personal trading, insider trading and confidentiality. Supervised persons may hold the same securities as client accounts, subject to the Code's reporting and pre-clearance requirements. Supervised persons and their family members may open Program accounts on the same terms, under the same rules and at the same fee as other clients. A copy of the Code is available on request.

Review of accounts. Models are evaluated every trading day, and accounts are monitored for drift and compliance with the Firm's limits. The Chief Compliance Officer or a designee reviews accounts and system activity at least quarterly, and the Investment Committee reviews model parameters at least quarterly. The Firm asks clients to update their questionnaire at least annually. Apex sends account statements at least quarterly.

Client referrals and other compensation. The Firm compensates unaffiliated promoters as described in Item 4.E. The Firm receives no economic benefit from non-clients for providing advisory services.

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