



**STUDIOi, LLC**

# Firm Brochure – Form ADV Part 2A

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*This brochure provides information about the qualifications and business practices of STUDIOi, LLC. If you have any questions about the contents of this brochure, please contact us at (480) 900-6118 or by email at: [cody@wearestudioi.com](mailto:cody@wearestudioi.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.*

*Additional information about STUDIOi, LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). STUDIOi, LLC's CRD number is: 332785. Registration as an investment adviser does not imply a certain level of skill or training.*

## ITEM 2

# Material Change

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The material changes in this brochure from the last annual updating amendment of STUDIOi, LLC on 02/26/2025 are described below. Material changes relate to STUDIOi, LLC 's policies, practices or conflicts of interests.

- STUDIOi, LLC has updated its Assets Under Management. (Item 4.E)
- STUDIOi, LLC has added its Website Address. (Cover Page)
- STUDIOi, LLC has added a disclosure regarding certain household relationships that may present potential conflicts of interest. (Item 10)
- STUDIOi, LLC has added Estate Planning document coordination services and fees (Items 4 and 5).
- STUDIOi, LLC has updated its Tailored Services (Item 4.B and 4.C)
- STUDIOi, LLC has updated its Methods of Analysis, Investment Strategies, & Risk of Loss (Item 8)
- STUDIOi, LLC has updated its Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests (item 10)
- STUDIOi, LLC has updated its Investment Discretion (Item 16)
- STUDIOi, LLC has updated its Brokerage Practices for clarity (Item 12)
- STUDIOi, LLC has updated its Fees and Compensation for clarification (Item 5)

ITEM 3

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## ITEM 4

# Advisory Business

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## A. Description of the Advisory Firm

STUDIOi, LLC (hereinafter “STUDIOi”) is a Limited Liability Company organized in the State of Arizona. The firm was formed in July 2024, and the principal owner is Cody Daniel Zindler.

## B. Types of Advisory Services

### *Portfolio Management Services*

STUDIOi offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. STUDIOi creates an Investment Policy Statement for each client, which outlines the client’s current situation (income, tax levels, and risk tolerance levels). Portfolio management services include, but are not limited to, the following:

- Investment strategy
- Personal investment policy
- Asset allocation
- Asset selection
- Risk tolerance
- Regular portfolio monitoring

STUDIOi evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

STUDIOi seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and without consideration of STUDIOi’s economic, investment or other financial interests. To meet its fiduciary obligations, STUDIOi attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and accordingly, STUDIOi’s policy is to seek fair and equitable allocation of investment opportunities/transactions among its clients to avoid favoring one client over another over time. It is STUDIOi’s policy to allocate investment opportunities and transactions it identifies as being appropriate and prudent among its clients on a fair and equitable basis over time.

## ***Co-Adviser Services***

STUDIOi will direct clients to Matson Money, a third-party investment adviser. STUDIOi will verify that all recommended advisers are properly licensed, notice filed or exempt in the states where STUDIOi is recommending the adviser to clients.

STUDIOi has entered into a Co-Advisor agreement with Matson Money. Matson Money takes responsibility for investment management, portfolio design, best execution, portfolio reporting, trading, trade error resolution, and custodian reconciliations. STUDIOi's responsibilities require us to:

- Provide you with Matson Money's disclosure brochure that describes its services and fees,
- Provide you with a written disclosure statement, titled "Co-Advisor Disclosure Statement", that describes the fees we receive for referring you to Matson Money, the "Co-Advisor Disclosure Statement" is Matson Money's title for the separate written disclosure document required by and described in Rule 206(4)-3 under the Investment Advisers Act of 1940.
- Maintain a relationship with you,
- Ensure that information about your specific goals, financial situation and risk preference remain current and advise Matson Money of changes in this information,
- Assist you in determining appropriate allocation models,
- Review account activity periodically,
- Contact or meet with you annually, and
- Respond to your inquiries.

If you choose to go forward with these services, you will enter into a written Investment Management Agreement with Matson Money and STUDIOi. Under this agreement, you authorize Matson Money to supervise and direct your investment accounts in accordance with the investment objectives for each account. Matson Money may accept investment restrictions you provide to Matson Money in writing.

In addition, co-advised clients are responsible for informing STUDIOi when changes occur in a client's personal or financial circumstances that may have a bearing on the manner in which assets are invested (i.e., a change to investment objectives). Co-advised clients will be contacted by STUDIOi at least annually to discuss their individual circumstances. Co-advised clients may invest with other third-party providers and in other investment products.

## ***Selection of Other Advisers***

STUDIOi may direct clients to third-party investment advisers, specifically Betterment LLC ("Betterment"), a registered investment advisor, which serves as sub-advisor to STUDIOi's clients. MTG LLC dba Betterment Securities ("Betterment Securities"), a registered broker-dealer and member FINRA and SIPC, serves as broker-dealer and custodian. Betterment and Betterment Securities are not related persons of any advisor on the Betterment for Advisors platform.

Before selecting other advisers for clients, STUDIOi will verify that all recommended advisers are properly licensed, notice filed or exempt in the states where STUDIOi is recommending the adviser to clients.

The services provided by Betterment include:

- Goal-Based Investment Management: Betterment’s goal-based investment platform allows STUDIOi and Clients to identify multiple investment goals for each Client, each with specific portfolio allocations;
- Portfolio Construction Tools: STUDIOi and Clients have access to a set of Betterment constructed portfolio strategies, third-party model portfolio strategies, or, if applicable, Advisor constructed custom portfolio strategies (described below), each of which is comprised of low cost, index-tracking exchange-traded funds or mutual funds (the latter only for advisors who are approved to construct portfolios with Dimensional Fund Advisors mutual funds), and are able to customize the risk-level for each investment goal (collectively “traditional securities portfolios”);
- Automated Investment Management Services: Betterment’s algorithms automate back-office tasks such as trading, portfolio management, and account rebalancing;
- Website and Mobile Application: Betterment’s website and mobile application provide a platform for account access and monitoring and delivery of account documentation and notices; and
- Advisor Dashboard: STUDIOi has access to a dashboard for purposes of monitoring and managing Client accounts.

Certain Advisors offer to their Clients through Betterment’s platform custom portfolio strategies (“Custom Portfolios”). If STUDIOi chooses to participate in this offering, STUDIOi may construct Custom Portfolios using its own investment methodologies, and STUDIOi’s Clients are able to use Betterment’s automated advice features, including automatic rebalancing, dividend reinvestment, tax loss harvesting, and asset location services. STUDIOi, and not Betterment, is responsible for managing any goal for which a Custom Portfolio is elected on the basis of a client’s financial situation and investment objectives. Betterment will not evaluate whether any Custom Portfolio is suitable for any Client’s individual investment objectives, either at the time of election or on an ongoing basis. In addition, STUDIOi, and not Betterment, is responsible for disclosing to our clients any limitations to Betterment’s features caused by the election of a Custom Portfolio strategy.

Betterment for Advisors offers several account types to STUDIOi and its Clients, such as taxable investing accounts, individual retirement accounts (IRAs), and cash management accounts (Cash Reserve). If STUDIOi’s Client also is employed by a company that utilizes Betterment’s 401(k) offering, Betterment at Work, Advisor may also manage Client’s Betterment 401(k) account if Client delegates investment management authority of their 401(k) to STUDIOi. STUDIOi can also view Clients’ Betterment checking account in their Advisor Dashboard, and STUDIOi can also view Clients’ health savings accounts (HSAs), if the Client has a Betterment HSA through their employer.

### *Educational Seminars/Workshops*

STUDIOi provides periodic educational seminars and workshops to clients and prospective clients free of charge.

## *Tailored Services and Investment Restrictions*

To use Betterment for Advisors' services, Clients and/or STUDIOi must inform Betterment of their financial situation and preferences through Betterment's online application. To set up an investing account through the Betterment platform, STUDIOi and/or its clients must select an investment goal, select a portfolio strategy (or follow the STUDIOi's pre-set default portfolio strategy), and set an allocation (the risk level of the portfolio which corresponds to a ratio of stock to bonds), and may provide additional details about the Client's investment objectives within Betterment's interface. Guidance provided by Betterment is available in the online application, but STUDIOi is ultimately responsible for ensuring that its clients are placed in suitable investments. STUDIOi is also responsible for ensuring that the information they provide to Betterment about Clients is accurate and up to date.

STUDIOi can also restrict the securities purchased for Client accounts by electing Betterment's Flexible portfolio strategy or Custom Portfolio strategy to choose their own asset classes and adjust allocation weights. Clients and/or their STUDIOi can influence Betterment's discretionary management of their account by turning on or off several of Betterment automated portfolio management features.

The scope of STUDIOi's involvement in investment implementation and oversight varies by account type, platform, and client agreement. In certain advisory relationships, STUDIOi provides portfolio design, asset allocation guidance, model selection, and ongoing monitoring, while trade execution and day-to-day implementation are carried out by third-party platforms or portfolio managers pursuant to their respective agreements. In other arrangements, STUDIOi may share discretionary authority or influence portfolio implementation through changes to investment models, asset allocation ranges, or client risk profiles, even where trades are executed systematically or by third parties.

## *Wrap Program*

Betterment for Advisors offers its investment sub-advisory services for traditional securities portfolios through a wrap fee program that includes custody and trading services provided by its affiliate, Betterment Securities.

## ***Pension Consulting Services***

STUDIOi offers consulting services to pension or other employee benefit plans (including but not limited to 401(k) plans). Pension consulting may include, but is not limited to:

- Identifying investment objectives and restrictions
- Providing guidance on various assets classes and investment options
- Recommending money managers to manage plan assets in ways designed to achieve objectives
- Monitoring performance of money managers and investment options and making recommendations for changes
- Recommending other service providers, such as custodians, administrators and broker-dealers
- Creating a written pension consulting plan

These services are based on the goals, objectives, demographics, time horizon, and/or risk tolerance of the plan and its participants.

## ***Financial Planning***

Financial plans and financial planning may include, but are not limited to: investment planning; life insurance; tax concerns; retirement planning; college planning; and debit/credit planning.

## ***Estate-Planning Document Coordination Services (Snug Software Platform)***

STUDIOi, LLC (“STUDIOi”) offers clients the option to use Snug, an independent third-party software platform that enables individuals to create their own estate-planning documents (including wills, revocable living trusts, powers of attorney, and advance directives). Snug is not affiliated with STUDIOi, and Snug is solely responsible for the legal content, system design, and ongoing maintenance of its platform.

### **Advisor Role & Limitations**

STUDIOi does not provide legal advice, legal services, or legal opinions. STUDIOi does not review, interpret, approve, or evaluate the sufficiency, enforceability, or appropriateness of any documents created through Snug or any other provider.

At a client’s request, STUDIOi may assist with administrative data entry in a strictly scrivener-only capacity, meaning information is typed into the platform solely as directed by the client. STUDIOi does not select legal provisions, recommend whether a client should create a will or a trust, or provide legal interpretation of any kind.

### **Custody & Access to Documents**

STUDIOi does not maintain or store any estate-planning documents created through Snug. STUDIOi also does not have the ability to execute, modify, or deliver completed legal documents on behalf of clients. Advisor access to Snug, if granted by the client, is read-only, and this structure is intended to avoid triggering custody under applicable regulatory standards.

### **Client Responsibilities**

Clients are solely responsible for:

- making all legal decisions within the platform,
- properly executing their documents (including notarization and witnessing) in accordance with applicable law,
- funding any trust they establish (including retitling assets and updating beneficiary designations), and
- maintaining and updating their estate plan over time.

STUDIOi does not implement, monitor, or verify document execution, trust funding, or subsequent updates.

### **Independence, Privacy, and Third-Party Limitations**

Snug is an independent entity. STUDIOi does not control Snug’s systems, data-handling practices, document storage, or security protocols. Clients should review Snug’s Terms of Service and Privacy Policy to understand how their information is collected, used, stored, and retained.

### **Limitations of Third-Party Estate-Planning Software**

Estate-planning software may not be suitable for clients with complex needs, including circumstances involving blended families, significant real estate or business holdings, special-needs planning, tax-sensitive strategies, or situations requiring legal judgment. Clients with complex circumstances should consult a qualified estate-planning attorney. STUDIOi does not determine whether Snug is appropriate for a client's specific legal needs.

### ***Services Limited to Specific Types of Investments***

STUDIOi generally limits its investment advice to mutual funds, although STUDIOi primarily recommends diversified asset allocation. STUDIOi may use other securities as well to help diversify a portfolio when applicable.

### ***Written Acknowledgement of Fiduciary Status***

When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. Under this special rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

## **C. Client Tailored Services and Client Imposed Restrictions**

STUDIOi offers the same suite of services to all of its clients. However, specific client investment strategies and their implementation are dependent upon the client Investment Policy Statement which outlines each client's current situation (income, tax levels, and risk tolerance levels). Clients may impose restrictions on investing in certain securities or types of securities in accordance with their values or beliefs, subject to platform and account limitations.

In limited circumstances, and at a client's direction, STUDIOi may accommodate non-core holdings or investment positions intended to reflect individual preferences or convictions. Such holdings are not relied upon to achieve the client's primary investment objectives and are considered separate from the Firm's core asset allocation framework. STUDIOi's role with respect to these holdings is generally limited to position sizing, monitoring, and evaluating their impact on overall portfolio risk.

## D. Wrap Fee Programs

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees and transaction costs.

STUDIOi does not sponsor or act as a wrap fee program sponsor. Certain client accounts may be maintained on the Betterment for Advisors platform, which is a wrap fee program administered by Betterment Securities.

STUDIOi's advisory fee is separate from and in addition to the Betterment wrap fee.

## E. Assets Under Management

STUDIOi has the following assets under management:

<b>Discretionary Amounts:</b>	<b>Non-Discretionary Amounts:</b>	<b>Date Calculated:</b>
\$25,883	\$5,006,031	December 2025

## ITEM 5

# Fees and Compensation

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## A. Assets-Based Portfolio Management Fees

Total Assets Under Management:	Annual Fees:
All Assets	1.00%

STUDIOi charges an annual asset-based advisory fee of 1.00% of assets under management unless otherwise agreed in writing.

The advisory fee is calculated using the value of assets in the account on the last business day of the prior billing period. Fees are generally negotiable and are memorialized in the client's written advisory agreement.

Clients may terminate the advisory agreement without penalty within five business days of execution. Thereafter, clients may terminate the agreement upon written notice. Refunds of unearned fees will be calculated on a prorated basis as described below. Platform and Third-Party Investment Manager Fees

Platform and third-party investment manager fees are determined by the respective provider and are disclosed in the provider's Form ADV Part 2A, Form CRS, prospectuses, and related account documentation. STUDIOi may recommend that clients engage third-party investment managers or advisory platforms, including but not limited to Matson Money and Betterment for Advisors.

Clients should understand that total costs associated with these arrangements are not limited to STUDIOi's advisory fee. Clients may incur additional expenses including, but not limited to:

- Underlying mutual fund or ETF expense ratios
- Platform or wrap fees
- Custodial fees
- Brokerage charges
- Transaction costs
- Wire transfer or banking fees
- Account maintenance or administrative fees

These costs are disclosed in the respective third-party provider's Form ADV Part 2A, Form CRS, prospectuses, and related account documentation.

Lower-cost alternatives may be available through other service providers.

## **Matson Money Co-Advisory Arrangements**

STUDIOi may recommend that clients engage Matson Money pursuant to a co-advisory arrangement.

Under this structure:

- STUDIOi charges its advisory fee (1.00% annually unless otherwise agreed in writing).
- Matson Money does not charge a separate asset-based advisory fee for portfolio management services.
- Matson Money's compensation is derived from expense ratios embedded within the proprietary mutual funds it manages.

Matson Money deducts STUDIOi's advisory fee directly from client accounts pursuant to written authorization and remits that amount to STUDIOi. Matson Money does not retain any portion of STUDIOi's advisory fee.

Clients bear all fund-level expenses and operating costs associated with the mutual funds utilized within the portfolio, as disclosed in the applicable fund prospectuses.

Clients should review Matson Money's Form ADV Part 2A and Form CRS for additional details regarding services, fees, conflicts of interest, and compensation structure.

## **Betterment for Advisors Platform**

Under the Betterment for Advisors platform:

- STUDIOi charges its advisory fee (1.00% annually unless otherwise agreed in writing).
- Betterment charges a separate asset-based platform fee (currently approximately 0.20%). The Betterment platform fee is not compensation to STUDIOi.

Betterment deducts STUDIOi's advisory fee pursuant to written authorization and remits that amount to STUDIOi in accordance with its standard platform procedures. Betterment does not retain any portion of STUDIOi's advisory fee.

The Betterment platform operates as a wrap fee program administered by Betterment. The wrap fee generally includes custody, execution, and certain automated portfolio services. However, clients may still incur additional underlying fund expenses and other account-related costs.

Clients should review Betterment's Form ADV Part 2A and Form CRS for full details regarding services, fees, and conflicts of interest.

## **B. Pension Consulting Fees**

<b>Plan Assets</b>	<b>Annual Fee</b>
All Assets	1.00%

STUDIOi may provide pension consulting services for employee benefit plans. STUDIOi charges an annual pension consulting fee of 1.00% of plan assets unless otherwise agreed in writing.

The following table summarizes STUDIOi's asset-based pension consulting fee schedule:

## C. Financial Planning Fees

STUDIOi offers financial planning services on an hourly or flat-fee basis.

Hourly fees generally range up to \$500 per hour depending on scope and complexity. Alternatively, STUDIOi may quote a fixed project fee in advance based on anticipated time commitment and scope.

Fees are payable as specified in the written agreement.

## D. Business Financial Consulting and Strategic Financial Services Fees

STUDIOi may charge hourly, flat project-based, or recurring monthly fees for business financial consulting services, including bookkeeping support and strategic financial oversight services.

Hourly fees for these services generally range up to \$500 per hour. Fixed or recurring fees are determined based on scope, complexity, and anticipated time commitment and are memorialized in a separate written agreement.

Fees may be billed monthly, quarterly, or as otherwise specified in the governing agreement. STUDIOi does not require or solicit payment of more than six months of fees in advance. In the event an engagement is terminated, unearned fees will be refunded in accordance with the governing agreement.

## E. Payment of Fees

### **Deduction of Asset-Based Advisory Fees**

For Matson-managed accounts, fees are generally deducted quarterly in advance by Matson Money pursuant to written authorization.

For Betterment accounts, fees are deducted monthly in arrears by Betterment pursuant to written authorization.

STUDIOi does not independently deduct fees from advisory accounts except where authorized.

### **Invoicing and Payment of Planning and Consulting Fees**

Fees for financial planning and business consulting services may be paid by check, ACH, wire, credit card, or other electronic payment method as specified in the governing agreement.

These fees are not deducted from client investment accounts unless separately authorized under an advisory agreement.

STUDIOi does not require or solicit payment of more than six months of fees in advance.

## F. Prepayment and Refund Policy

STUDIOi may collect certain fees in advance. STUDIOi does not require or solicit payment of more than six months of fees in advance.

If an engagement is terminated, unearned fees will be refunded on a prorated basis within fourteen days.

For asset-based fees paid in advance, refunds are calculated by dividing the annual rate by 365 and multiplying by the number of days remaining in the billing period.

For hourly or flat-fee engagements, refunds reflect the portion of work not yet completed.

## G. Client Responsibility for Third-Party Fees

Clients are responsible for third-party expenses including custodian fees, brokerage fees, mutual fund expenses, ETF expenses, and other transaction-related costs. These fees are separate from and in addition to fees charged by STUDIOi.

## H. Outside Compensation

Neither STUDIOi nor its supervised persons accept compensation for the sale of securities or investment products.

Compensation arrangements related to third-party lead generation services are disclosed in Item 14.



## ITEM 6

# Performance-Based Fees and Side-By-Side Management

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STUDIOi does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client. Betterment for Advisors does not charge performance-based fees.

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## ITEM 7

# Types of Clients

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STUDIOi generally provides advisory services to the following types of clients:

- Charitable Organizations
- High-Net-Worth Individuals
- Individuals
- Pension and Profit-Sharing Plans
- Small Businesses

There is no account minimum for any of STUDIOi's services.

## ITEM 8

# Methods of Analysis, Investment Strategies, & Risk of Loss

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## A. Methods of Analysis and Investment Strategies

### *Methods of Analysis*

STUDIOi's methods of analysis include Modern portfolio theory and Quantitative analysis.

Modern portfolio theory is a theory of investment that attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, each by carefully choosing the proportions of various assets.

Quantitative analysis deals with measurable factors as distinguished from qualitative considerations such as the character of management or the state of employee morale, such as the value of assets, the cost of capital, historical projections of sales, and so on.

### *Investment Strategies*

STUDIOi does not employ short-term or speculative trading strategies designed to predict near-term market movements. Portfolio changes, when made, are generally driven by client objectives, risk considerations, structural portfolio decisions, rebalancing discipline, or changes in client circumstances, rather than attempts to time the market or react to short-term market fluctuations. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

## B. Material Risks Involved

### *Methods of Analysis*

Modern portfolio theory assumes that investors are risk averse, meaning that given two portfolios that offer the same expected return, investors will prefer the less risky one. Thus, an investor will take on increased risk only if compensated by higher expected returns. Conversely, an investor who wants higher expected returns must accept more risk. The exact trade-off will be the same for all investors, but different investors will evaluate the trade-off differently based on individual risk aversion characteristics. The implication is that a rational investor will not invest in a portfolio if a second portfolio exists with a more favorable risk-expected return profile – i.e., if for that level of risk an alternative portfolio exists which has better expected returns.

Quantitative analysis Investment strategies using quantitative models may perform differently than expected as a result of, among other things, the factors used in the models, the weight placed on each factor, changes

from the factors' historical trends, and technical issues in the construction and implementation of the models.

Client-directed, non-core holdings may introduce additional concentration, volatility, or diversification risk and may result in portfolio outcomes that differ from those of the Firm's core asset allocation framework. These risks may limit the effectiveness of diversification and risk management strategies and may increase the likelihood of portfolio volatility or loss.

## **Investment Strategies**

Betterment for Advisors makes available three categories of securities portfolio strategies: Betterment Constructed Portfolios, Third-Party Portfolios, and Custom Portfolios.

- Betterment Constructed Portfolios are portfolios composed of securities for which Betterment selects the underlying securities and weightings of those securities associated with particular allocations. Betterment Constructed Portfolios are composed of publicly traded ETF securities.
- Third-Party Portfolios are portfolio strategies that are constructed and updated by third-party managers. Betterment does not select the underlying securities in Third-Party Portfolios but periodically reviews the Third-Party Portfolios to ensure that the portfolios remain consistent with the portfolio objectives identified by the third-party manager.
- Custom Portfolios are Advisor-designed custom portfolios that Advisors are able to construct. A Custom Portfolio consists of a set or multiple sets of securities and allocations with underlying return and volatility assumptions that are either (i) provided by the Advisor to Betterment or (ii) defaulted to Betterment's capital markets assumptions if the Advisor does not provide assumptions. For any Advisor and/or Client who elects a Custom Portfolio, Betterment will allocate the Client's assets in accordance with the Custom Portfolio. For Custom Portfolios, the Advisor and not Betterment is responsible for ensuring the Custom Portfolio (1) is suitable for its clients, and (2) is constructed and managed in a manner consistent with the Client's financial situation and investment objectives. For certain DFA-authorized Advisors on the Betterment for Advisors platform, an Advisor may design a Custom Portfolio constructed entirely of DFA mutual funds and ETFs (such Custom Portfolio, a "DFA Portfolio"). Betterment does not independently review and/or approve Advisor-built Custom Portfolios.

For additional information on the current investment strategies Betterment offers, please refer to Betterment's Form ADV Part 2A.

All investing involves risks. Betterment's Form ADV Part 2A discusses risks inherent in all investing. Please review this section in detail.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

## **C. Risks of Specific Securities Utilized**

Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below are not guaranteed or insured by the FDIC or any other government agency.

**Mutual Funds:** Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond "fixed income" nature (lower risk) or stock "equity" nature.

Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

## ITEM 9

# Disciplinary Information

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### A. Criminal or Civil Actions

There are no criminal or civil actions to report.

### B. Administrative Proceedings

There are no administrative proceedings to report.

### C. Self-regulatory Organization (SRO) Proceedings

There are no self-regulatory organization proceedings to report.

## ITEM 10

# Other Financial Industry Activities and Affiliations

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### A. Registration as a Broker/Dealer or Broker/Dealer Representative

Neither STUDIOi nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer.

### B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

Neither STUDIOi nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

### C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests

From time to time, a member of the advisor's household may be named as a beneficiary in a client's estate plan or may be the client's likely future default heir (for example, in the absence of closer relatives). These situations may create a potential conflict of interest because the advisor's household could benefit from a client's future financial decisions.

STUDIOi manages these potential conflicts by maintaining such relationships on a non-discretionary basis unless separately authorized in writing, requiring written client authorization for material changes or transactions, and following internal procedures designed to maintain clear separation between advisory duties and any personal or familial relationships.

In certain cases, STUDIOi provides standalone analytical, review, or evaluative services related to financial products, investment structures, or strategies implemented by third parties. As a result of these reviews, STUDIOi may have an economic incentive if a client later elects to engage the Firm for additional advisory or planning services. Any such future engagement is optional, subject to separate agreements and fee disclosures, and clients are under no obligation to retain STUDIOi for additional services.

## D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections

STUDIOi has entered into a co-advisory agreement with Matson Money, an unaffiliated money manager, under which it recommends on a non-discretionary basis that clients open an account in an advisory program offered by Matson Money. In using third party advisers, there is a conflict of interest in that STUDIOi would have an incentive to direct clients to third-party investment advisers that provide STUDIOi with a larger fee split. This is mitigated because Matson Money charges no separate advisory fee of its own for the asset allocation services it provides to accounts participating in the Matson Fund Platform. Instead, Matson Money will be compensated via the expense ratio associated with the Matson Fund Platform; Matson Money also collects STUDIOi's advisory fee directly from the custodian and then remits that advisory fee to STUDIOi. Moreover, STUDIOi will always act in the best interests of the client, including when determining which third-party investment adviser to recommend to clients. STUDIOi will verify that all recommended advisers are properly licensed, notice filed or exempt in the states where STUDIOi is recommending the adviser to clients.

STUDIOi may direct clients to third-party investment advisers. Clients will pay STUDIOi its standard fee in addition to the standard fee for the advisers to which it directs those clients. The fees will not exceed any limit imposed by any regulatory agency. STUDIOi will always act in the best interests of the client, including when determining which third-party investment adviser to recommend to clients. STUDIOi will ensure that all recommended advisers are exempt, licensed or notice filed in the states in which STUDIOi is recommending them to clients.

## ITEM 11

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

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## A. Code of Ethics

STUDIOi has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Record-keeping, Annual Review, and Sanctions. STUDIOi's Code of Ethics is available free upon request to any client or prospective client.

### *Conflicts of Interest*

As part of our relationship with Matson Money and Axos, Matson Money and/or Axos may offer STUDIOi services intended to help us manage and further develop our business enterprise, such as additional advisory services, access to webinars, and advice about using the Matson Money or Axos platforms to grow our business. Matson Money and/or Axos may offer different or expanded services in the future. These services could create an incentive for STUDIOi to recommend that Clients invest through either platform. This is a potential conflict given that our interest in recommending Matson Money and/or Axos could be influenced by our receipt of Matson Money and/or Axos' services to our business. Other potential conflicts may exist regarding our use of Matson Money and/or Axos.

As part of our relationship with Betterment and Betterment Securities, Betterment may offer STUDIOi services intended to help us manage and further develop our business enterprise, such as additional advisory services, access to webinars, and advice about using the Betterment for Advisors platform to grow our business. Betterment may offer different or expanded services in the future. These services could create an incentive for STUDIOi to recommend that Clients invest through the Betterment for Advisors platform. This is a potential conflict given that our interest in recommending Betterment could be influenced by our receipt of Betterment's and/or Betterment Securities' services to our business. Additionally, Betterment may offer discounted pricing to STUDIOi Clients based on the total combined assets of all of our Clients on the Betterment for Advisors platform. Other potential conflicts may exist regarding our use of the Betterment for Advisors platform.

## B. Recommendations Involving Material Financial Interests

STUDIOi does not recommend that clients buy or sell any security in which a related person to STUDIOi or STUDIOi has a material financial interest.

## C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of STUDIOi may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of STUDIOi to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. STUDIOi will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

## D. Trading Securities At/Around the Same Time as Clients' Securities

From time to time, representatives of STUDIOi may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of STUDIOi to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest; however, STUDIOi will never engage in trading that operates to the client's disadvantage if representatives of STUDIOi buy or sell securities at or around the same time as clients.

## ITEM 12

# Brokerage Practices

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## A. General Brokerage and Execution Structure

Brokerage and execution arrangements depend on the advisory platform, account type, and client agreement selected.

STUDIOi does not maintain a single default broker-dealer or custodian for all client accounts. Custodial and execution arrangements may involve third-party advisory platforms or investment managers, including Matson Money and Betterment for Advisors, as well as custodians such as Axos.

In many client relationships, trade execution is conducted by the applicable third-party platform, custodian, or portfolio manager pursuant to its own brokerage arrangements and program structure. STUDIOi does not route trades on a broker-by-broker basis in these arrangements.

When recommending custodians or advisory platforms, STUDIOi considers factors such as service capabilities, platform functionality, operational efficiency, cost structure, and client suitability.

## B. Matson Money Platform and Custodian Selection

For accounts managed through Matson Money under a co-advisory arrangement:

- Matson Money determines the custodial relationships available for its advisory programs.
- STUDIOi may recommend and facilitate account establishment with one of the custodians available through Matson's platform.
- STUDIOi currently utilizes Axos for applicable Matson accounts.

STUDIOi does not receive transaction-based compensation, brokerage credits, revenue sharing, or soft-dollar benefits in connection with custodial selection. Matson Money is responsible for portfolio management, trading, best execution, and trade error resolution for these accounts. STUDIOi does not exercise discretionary trading authority over Matson-managed accounts.

## C. Betterment for Advisors Wrap Program

For accounts established through Betterment for Advisors:

- Betterment Securities serves as broker-dealer and custodian.
- Betterment executes transactions pursuant to its wrap fee program structure.

- Clients are required to maintain accounts through Betterment Securities in order to participate in the Betterment platform.
- STUDIOi does not direct brokerage to alternative executing brokers within the Betterment platform.

In certain Betterment arrangements, STUDIOi may exercise discretionary authority over portfolio parameters, model selection, or custom portfolio construction; however, trade execution is handled by Betterment Securities pursuant to the wrap program.

## D. Research and Other Benefits (Soft Dollar Considerations)

STUDIOi does not receive traditional soft-dollar benefits (i.e., research, brokerage credits, or other products or services tied to client securities transactions).

STUDIOi may receive educational materials, platform updates, practice-management resources, or training from custodians or advisory platforms such as Matson Money or Betterment. These materials are generally made available to participating advisors and are not tied to client transaction volume.

STUDIOi does not receive commission-based research arrangements, brokerage credits, or institutional trading rebates in connection with client accounts.

## E. Directed Brokerage

In platform-based arrangements such as Betterment for Advisors, clients are not permitted to direct brokerage to alternative executing brokers.

In other advisory relationships, brokerage direction may be limited by the structure of the selected custodian or investment manager.

## F. Aggregated Trading

In most advisory relationships, trade execution is handled by third-party platforms or portfolio managers, and STUDIOi does not place trades directly or engage in aggregated (block) trading.

In limited circumstances where STUDIOi has authority to implement portfolio changes within a platform or program structure, trade execution is conducted pursuant to that platform's or manager's established trading procedures.

### ITEM 13

## Review of Accounts

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## A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews

All client accounts for STUDIOi's advisory services provided on an ongoing basis are reviewed at least annually by Cody D Zindler, CEO, with regard to clients' respective investment policies and risk tolerance levels. All accounts at STUDIOi are assigned to this reviewer.

All financial planning accounts are reviewed upon financial plan creation and plan delivery by Cody D Zindler, CEO. Financial planning clients are provided a one-time financial plan concerning their financial situation. After the presentation of the plan, there are no further reports. Clients may request additional plans or reports for a fee.

## B. Factors That Will Trigger a Non-Periodic Review of Client Accounts

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

With respect to financial plans, STUDIOi's services will generally conclude upon delivery of the financial plan.

## C. Content and Frequency of Regular Reports Provided to Clients

Each client of STUDIOi's advisory services provided on an ongoing basis will receive a quarterly report detailing the client's account, including assets held, asset value, and calculation of fees. This written report will come from the custodian.

Each financial planning client will receive the financial plan upon completion.

## ITEM 14

# Client Referrals and Other Compensation

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### A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)

STUDIOi will receive a non-economic benefit from Betterment Securities in the form of the support products and services it makes available to STUDIOi (and other independent investment advisors whose clients maintain their accounts at Betterment Securities). The availability of Betterment Securities' products and services to STUDIOi is not based on STUDIOi giving particular investment advice, such as buying particular securities for its clients. STUDIOi is also deemed to give Betterment an indirect benefit in the form of the asset-based fees Betterment receives from STUDIOi's Clients on the Betterment for Advisors platform.

### B. Compensation to Non – Advisory Personnel for Client Referrals

STUDIOi utilizes third party lead generation services provided by Invested Better. STUDIOi pays a flat fee per match generated by Invested Better which creates a potential conflict of interest. Compensation with respect to the foregoing will be fully disclosed to each client to the extent required by applicable law. Invested Better does not provide investment advice or make recommendations about any specific Advisors' qualifications or abilities.

## ITEM 15

# Custody

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STUDIOi does not maintain custody of client funds or securities. Client assets are maintained with qualified custodians, including Betterment Securities and other custodial institutions as applicable. Clients enter into custodial agreements directly with the respective custodian and receive account statements directly from those custodians. STUDIOi encourages clients to carefully review all account statements for accuracy.

Certain client agreements authorize the custodian or platform provider to deduct advisory fees from client accounts and remit such fees to STUDIOi. STUDIOi does not independently take possession of client funds or securities.

For Betterment IRA accounts, custodial services are provided by the designated IRA custodian pursuant to the client's custodial agreement.

## ITEM 16

# Investment Discretion

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Clients who participate in the Betterment for Advisors wrap free program have discretionary accounts, meaning that STUDIOi and Betterment can buy and sell investments on Client's behalf when they determine it is appropriate to do so. Betterment uses algorithms to advise Clients and manage their accounts. These algorithms are developed, overseen, and monitored by Betterment's investment advisory personnel. To use Betterment's investment services, Clients and/or STUDIOi inform Betterment of a Client's financial goals and personal information through Betterment's online applications. Betterment provides STUDIOi and Clients with information about its offered portfolio strategies to inform their decision-making but does not make recommendations to Clients that they invest in any particular strategy. Each portfolio is associated with a target allocation of investment types and/or asset classes but STUDIOi or Clients can modify Betterment's initial target allocation as desired. If STUDIOi places a Client in a Custom Portfolio, Betterment will allocate the Client's accounts in accordance with STUDIOi's parameters specified in the Custom Portfolio rather than based on Betterment's own investment methodology.

In the absence of a contrary direction, Betterment periodically rebalances Client portfolios so that in the face of fluctuating market prices each Client's portfolio remains within a range of the target allocation. Betterment also offers optional tax loss harvesting and automated asset location services. Clients will have fewer opportunities to harvest tax losses if STUDIOi elects for that Client a Custom Portfolio strategy with fewer asset classes than are included in the Betterment portfolio strategy.

The extent of STUDIOi's investment discretion varies by client agreement, account type, and investment platform. In some relationships, STUDIOi does not exercise discretionary trading authority and provides advisory guidance, monitoring, and coordination while investment implementation is handled by third-party portfolio managers or platforms. In other arrangements, STUDIOi may share discretionary authority or influence investment implementation through model selection, asset allocation adjustments, or changes to portfolio structure. Clients are informed of the applicable discretion arrangements prior to engagement.

Where applicable, discretionary authority over such non-core holdings is limited to implementation and risk-management parameters and does not typically include tactical or directional market forecasting.

## ITEM 17

# Voting Client Securities (Proxy Voting)

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STUDIOi will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

For assets managed on the Betterment for Advisors platform, Clients delegate to Betterment the authority to receive and vote all proxies and related materials for any security held in Betterment accounts. Betterment maintains policies and procedures reasonably designed to mitigate conflicts of interest and reasonably ensure that proxy matters are conducted in the best interest of Clients.

Betterment will only vote on proxies and respond to corporate actions associated with securities that Betterment currently selects for Betterment Constructed Portfolios (as defined above) and will abstain from voting on other securities, including but not limited to those securities only present in third-party portfolios, Advisor custom portfolios, or securities transferred to Betterment via ACATS, in each case that are not already supported in a Betterment Constructed Portfolio. If a security is present in Betterment Constructed Portfolios and outside of Betterment Constructed Portfolios, Betterment will vote on proxies associated with that security in all portfolios in which it is held. Betterment will abstain from voting on such proxies if it determines that abstaining is in the best interest of its clients. Additional information about proxy matters is contained in Betterment's Form ADV Part 2A.

## ITEM 18

# Financial Information

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### A. Balance Sheet

STUDIOi neither requires nor solicits prepayment of more than \$500 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

### B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

Neither STUDIOi nor its management has any financial condition that is likely to reasonably impair STUDIOi's ability to meet contractual commitments to clients.

### C. Bankruptcy Petitions in Previous Ten Years

STUDIOi has not been the subject of a bankruptcy petition in the last ten years.

## ITEM 19

# Requirements for State Registered Advisors

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### A. Principal Executive Officers and Management Persons; Their Formal Education and Business Background

STUDIOi currently has only one management person: Cody Daniel Zindler. Education and business background can be found on the individual's Form ADV Part 2B brochure supplement.

### B. Other Businesses in Which This Advisory Firm or its Personnel are Engaged and Time Spent on Those (If Any)

Other business activities for each relevant individual can be found on the Form ADV Part 2B brochure supplement for each such individual.

### C. Calculation of Performance-Based Fees and Degree of Risk to Clients

STUDIOi does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

### D. Material Disciplinary Disclosures for Management Persons of this Firm

There are no civil, self-regulatory organization, or arbitration proceedings to report under this section.

### E. Material Relationships That Management Persons Have with Issuers of Securities (If Any)

See Item 10.C and 11.B.