

Auvoria Prime

Regulatory Compliance

EFFECTIVE FEBRUARY 1ST, 2020

Auvoria Prime LLC (the "Company") is classified as a publisher of financial news and information and therefore exempt from registration with the SEC. This is an exemption provided in the U.S. Securities Investment Advisers Act of 1940. We provide financial research and information to the public, but it is completely at the discretion of the individual as to whether they will use the information or not.

"a publisher of any bona fide newspaper, news column, newsletter, news magazine, or business or financial publication or service, whether communicated in hard copy form, or by electronic means, or otherwise, that does not consist of the rendering of advice on the basis of the specific investment situation of each client."

NOT PROVIDING ADVICE

The Company delivers trade strategy signals, alerts, research, analysis and convenience tools that are sent to subscribing members via email, mobile app, and website membership access. There is no customization, review or consultation of the member's personal financial objectives, situation or need. The member is free to act or not to act on the information provided. All information is provided uniformly to the member base without modification or consideration of any **personal** situation or need.

Qualifying as a Publisher

United States regulatory as defined by the Securities Exchange Commission and executed by FINRA uses the following criteria to determine eligibility for the exemption:

"4. Publishers. Publishers are excluded from the Act, but only if a publication: (i) provides only impersonal advice (i.e., advice not tailored to the individual needs of a specific client); (ii) is "bona fide," (containing disinterested commentary and analysis rather than promotional material disseminated by someone touting particular securities); and (iii) is of general and regular circulation (rather than issued from time to time in response to episodic market activity)."

Reference Source:

- www.sec.gov
- http://www.sec.gov/about/offices/oia/oia_investman/rplaze-042012.pdf
- <http://www.sec.gov/investor/pubs/cyberfraud/newsletter.htm>

The Company is NOT an Investment Advisor, Broker, Dealer or Fiduciary

We provide research, commentary and trade signals for world financial markets which may include but are not limited to: US equities, options, ETF (exchange traded funds), currencies including cryptocurrency and crowd funding.

To further clarify our position as a Publisher, please note the following:

- The Company does not take possession of any person's investment capital
- The Company does not get paid by a financial institution for the research information provided
- None of the commentary, newsletters, alerts are an offer to purchase or recommend the purchase of securities
- The user of our products and services does so at their own discretion, they are free to act or ***not act*** on the information provided
- Users of our product may select any brokerage firm if they choose to act on the information provided. The only exception to this would be convenience "swipe" tools that may not be enabled by all brokerage firms.
- The Company does not know the individual financial situation, objectives or needs of the persons who use their services
- The Company does not modify the research information delivered to persons using their services, all information is delivered uniformly to subscribed members

TRANSPARENCY

Performance of Services

The Company maintains a strong commitment to transparency especially with the performance statistics of our services. We continually modify the method in which we review percentage gains to enable individuals to clearly understand risk, loss of capital, variances, and drawdown periods.

We have the following policies in place regarding performance statistics of our trade research:

- Each trade including date entered, exited, price and symbol since inception is published on our public site for members and non-members to review.
- We have implemented live accounts for all our trade services and use these live accounts to post performance.
- If we publish performance statistics for a particular period, we issue this information uniformly to our member base who may refer to this information when speaking about our services.
- Our members are prohibited from posting claims, performance statistics or any reference to profit that has not been specifically issued by the Company.
- We discourage members from sharing their personal trade histories however we maintain no jurisdiction in this regard and ultimately a user of our services may share their personal experience with whomever they want.

- All performance includes our basic disclaimers:
 - Past performance is not indicative of future results
 - Individual trade results will vary
 - Commissions are not reflected in trade performance
 - Trading involves risk including the risk of losing part, all or more of the initial monies invested
 - Trade results will vary from account to account
 - Both gains and losses will be experienced by users of the services and each member must define and act within their personal risk tolerance

Disclaimers

The Company works to ensure that members fully understand both performance and use disclaimers. We have a commitment to a “plain language” representation of our disclaimers where all training sessions, recordings, newsletter alerts, emails, website posts, and subscriptions include our detailed disclosure of risk and the use of our products solely at the member’s discretion.

An example of a disclaimer from our presentations:

- **Auvoria Prime is not a Registered Investment Advisor, or Broker Dealer.**
- **The information provided in newsletters, applications, and/or alerts and live sessions is intended as educational material only.**
- **The information should not be construed as an investment recommendation or advice.**
- **The Trading of currencies, cryptocurrencies, futures, stocks, and options involves risk including losing all or part of the money invested and may not be suitable for all investors.**
- **Past performance is not indicative of future results.**
- **Users participate at their own risk and agree to indemnify and hold harmless Auvoria Prime LLC, its employees, market experts, agents, and affiliates.**
- **Participation in the Auvoria Prime Rewards Plan is completely optional.**
- **You do not need to be an affiliate to purchase Auvoria Prime Products.**
- **You do not need to purchase Auvoria Prime Products to earn money with the Auvoria Prime Rewards Program.**

Persons who choose to purchase a subscription and subscribe to our information research and trade services also accept additional disclaimers and risk disclosure at the time of purchase.

AUTOMATED TRADE TECHNOLOGY

Convenience Tools

The Company provides opportunity tools for US traders in the Currency and cryptocurrency markets. The best way to explain the technology tools is that it is an “automated trade opportunity alert” but NOT an “automated trade.” Only the user can complete the process to affect the trade taking place.

In 2018, the CFTC deemed that convenience/copier trading required a CTA (Commodities Trading Advisor) license. This ruling caused several companies in the industry to settle suits with the CFTC where these companies agreed to monetary fines and to cease providing automated trading tools.

It is because of this that Auvoria Prime LLC will not be providing automated trade assistance tools, convenience tools, or trade automation of any kind where it is considered non-compliant to do so. We provide trade research and alerts and the customer chooses whether they act on the research we provide.

We will, however, be offering automated services where it is deemed legally compliant to do so.

BROKERS OF CHOICE

The Company is NOT a Broker

As stated throughout this document, Auvoria Prime LLC is not a broker, dealer, advisor, fiduciary or registered/licensed financial entity.

We are a publisher of financial information, education and research.

Our members are free to use the information we provide to place trades for themselves with whichever broker they choose.

We do, however, review various brokers and provide “brokers of choice” which are firms that are compliant, under regulatory control, and offer services beneficial to members such as enhanced customer service and additional training to name a few.

Brokers of Choice

Brokers of Choice are not affiliated with the Company, we do not have an agreement, partnership, arrangement or any type of legal association with any of these firms. A “broker of choice” is simply listed to provide our members services that may not be available through all brokers.

We also provide our members a list of considerations they should review before they select a brokerage firm which includes but is not limited to:

- Fees
- Registration
- Regulatory

- Customer Support (800#, chat, 24-hour service etc.)
- Deposit and Withdrawal terms
- Customer Feedback & Industry Ratings

CRYPTOCURRENCY

Guidelines & Regulation

The Company may provide members access to products and services relative to trading in the cryptocurrency markets similar to those offered in the forex markets and other markets. Guidance regarding the cryptocurrency environment is not yet fully determined. The market is emerging, and regulatory guidance is in the process of being developed, changed, and further refined.

The Company is committed to understanding the rapidly changing regulatory environment and desires to ensure all services are within the regulatory guidelines. The Company will change, modify or eliminate a service if it is deemed to be outside regulatory guidance.

The Company does not make any representation of performance returns for any of the trade research products. Each member must accept the risk and responsibility for any service they put into practice.

Affiliates

The Company offers an optional Reward Plan to members who would like to actively sell our services to others. Compliance and governance over the actions of our Affiliates is critical to our operations, reputation and overall customer satisfaction.

Our Affiliates are governed by an extensive policy & procedures manual:

http://www.auvoriaprime.com/policies/auvoriaprime_P&P.pdf

Violations of policy are taken very seriously and could result in the termination of a Affiliate Agreement.

With today's instantaneous access to information, the ability for us to police and scrutinize each post, tweet, video or comment regarding our services is challenging. We are continually deploying additional technologies to assist in automating web searches for compliance infractions.

In many cases, we find that individuals and users of our services only have a common understanding of terms and not the impact and meaning certain words have in the regulatory environment. Use of the words, "advice, automatic, opportunity, etc." seem harmless to those who are speaking in plain terms. Therefore, we have a commitment to compliance education of our Affiliates to ensure their awareness and implications of using such words when discussing our products and services. We are continually adding additional courses, personnel and expanding our discussions of the regulatory environment.

Summary

The subject of compliance is extensive and rapidly changing. At times, even professional legal resources are in conflict as to the interpretation of newly implemented regulations. Despite these complexities, the Company is committed to conformance to all regulatory guidance and full transparency of our product performance and operations.

In addition to the aforementioned procedures, we strive to maintain an A rating with the Better Business Bureau and other third-party reporting agencies such as Dun & Bradstreet.

If anyone reading this document believes a policy violation has been committed, or if you have general questions regarding this document, we urge you to contact us directly by email by:

sending an email to:

compliance@auvoriaprime.com

or by mail to:

Auvoria Prime LLC, 30 N. Gould St. Ste. R, Sheridan, WY 82801.

Effective Date

The effective date of this Products & Services Regulatory Compliance is February 1st, 2020.