

# Silo Financial LLC

## Firm Brochure – Form ADV Part 2A

*This brochure provides information about the qualifications and business practices of Silo Financial LLC. If you have any questions about the contents of this brochure, please contact by email at: [support@silomarkets.com](mailto:support@silomarkets.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 Silo Financial LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Silo Financial LLC CRD number is: 324307.*

5900 Balcones Dr Suite 100  
Austin, TX 78731  
[support@silomarkets.com](mailto:support@silomarkets.com)

*Registration as an investment adviser does not imply a certain level of skill or training.*

Version Date: 03/25/2024

## Item 2: Material Changes

The following material changes represent all material changes since the last annual filing of the Form ADV 2A, February 2024.

1. Item 4D: Material change noting the end of the wrap fee program. Silo no longer offers a wrap fee program.
2. Item 5A: Removal of previous subscription fee program. Explanation in the method in which Silo calculated AUM for a client's account. Disclosure regarding the right of Silo to modify the fee as Silo see's necessary.
3. Item 5C: Clients will be responsible for the payment of transaction fees such as commissions on bonds. Silo will be responsible for any withdrawal/deposit fees. Transaction commissions will be covered up until a yearly trading volume of \$100,000 in the event the client is subject to a promotion. Silo reserves the right to change the yearly trading volume limit as it sees fit.

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## Item 4: Advisory Business

### A. Description of the Advisory Firm

Silo Financial LLC (hereinafter “Silo”) is a Limited Liability Company organized in the State of Texas. The firm was formed in May 2022, and the principal owner is Hariharan Jayakumar.

### B. Types of Advisory Services

Silo provides “robo-advisory” portfolio management services through an online interface. This entails the use of algorithm-based portfolio management advice, rather than in-person investment advice. These automated investment solutions are customized to each client and based on individual characteristics, such as the client’s marital status, risk tolerance, income, and current assets, among others. Silo’s investment advisory personnel oversee the algorithm but may not monitor each client’s account. Clients are encouraged to update their account/questionnaire with any change in their objectives, risk tolerance, or other pertinent information, as that information factors into the portfolio’s composition.

Silo also offers the opportunity for customers to purchase individual bonds. Customers can search and purchase any corporate or government bond available on the platform in a self-direct fashion. Silo uses customer suitability information from their profile to assign scores to each bond by maturity. Customers can search for any company or government and see each bond by maturity as well as its respective suitability score.

#### Services Limited to Specific Types of Investments

Silo generally limits its investment advice to fixed income securities and treasury inflation protected/inflation linked bonds, although Silo primarily recommends fixed income. Fixed income securities include corporate and government bonds.

#### Written Acknowledgement of Fiduciary Status

We also have a fiduciary duty under the Investment Advisers Act of 1940 with respect to all client 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

Silo provides online “robo-advisory” portfolio management. This automated approach factors in clients’ financial situation and risk tolerance, although the algorithms used to provide advisory services are designed to be utilized by Silo across multiple clients. Due to our use of suitability scores, clients have the last say in deciding which securities to purchase and can invest in securities in accordance with their values and beliefs.

### 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. Silo does not participate in wrap fee programs.

### E. Assets Under Management

Silo has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$0	\$23,766	April 2024

## Item 5: Fees and Compensation

### A. Fee Schedule

#### Robo-Advisory Portfolio Management Services Fees

Silo provides robo-advisory portfolio management services via an online interface. Silo does not charge any subscription fees for this service. Clients are only responsible for the payment of third-party fees charged by our custodian, Interactive Brokers.

To calculate assets under management (AUM), Silo uses an average of the daily balance in the client's account throughout the monthly period, after taking into account deposits and withdrawals, for purposes of determining the market value of the assets upon which AUM is derived from.

This fee schedule will be memorialized in the client's advisory agreement. Clients may terminate the agreement without penalty within five business days of signing the Investment Advisory Contract. Clients may always leave the platform simply by withdrawing all funds and closing all positions. Important to note, however, closing any open position will result in the payment of commission fees.

Note: Certain Silo promotional programs might include Silo being responsible for all fees on the platform. For such programs or any other arrangement where Silo is covering brokerage fees in addition to other fees, there is a \$100,000 yearly trading volume limit. Silo reserves the right to revoke "free" programs in the event it finds a client is abusing the bounds of the program.

### B. Payment of Fees

#### Payment of Robo-Advisory Portfolio Management Fees

As of 03/26/2024, Silo does not charge Portfolio Management Fees. Only fees that clients will incur are commissions on the purchase or sale of securities on the platform.

### C. Client Responsibility For Third Party Fees

Clients are responsible for the payment of certain third-party fees, namely commissions charged on the purchase and sale of securities on the platform. Clients are not responsible for the payment of other fees on the platform such as withdrawal fees when applicable.

Silo may run promotions in which the company could offer to cover commissions for a period of time. In those situations, clients will not be responsible for the payment of any fees on the platform for the promotional period. In such promotional periods, Silo will cover all commissions on client accounts up until a yearly trading volume of \$100,000. Silo reserves the right to revoke promotions in situations where clients are excessively trading on the platform.

Silo reserves the right to change this on a periodic basis and will provide clients with written notice in the event a change is to occur.

### D. Prepayment of Fees

Silo does not collect fees for advisory services. Brokerage fees are paid at the time of purchase or sale of securities.

### E. Outside Compensation For the Sale of Securities to Clients

Neither Silo nor its supervised persons accept any compensation for the sale of investment products, including asset-based sales charges or service fees from the sale of mutual funds.

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

Silo 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.

## Item 7: Types of Clients

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

- Individuals
- High-Net-Worth Individuals

## Item 8: Methods of Analysis, Investment Strategies, & Risk of Loss

### A. Methods of Analysis and Investment Strategies

#### Methods of Analysis

Silo creates suitability scores based on customer financial information, but ultimately allows customers the final say on which securities they decide to purchase on the platform.

**Suitability scores** are numerical scores from 1-100 that capture an individual's financial profile. This includes considerations of the bonds risk profile as well as its investment horizon.

## Investment Strategies

Silo believes in long term trading.

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

## B. Methods of Analysis and Investment Strategies

### Methods of Analysis

**Suitability Scores** created by our platform view suitability in two parts, risk and maturity. A client's risk suitability for a given bond depends on the credit rating of the bond and the client's investing profile. Using a given goal (Preservation, Income, Growth, Trading, Speculation, Hedging) and risk tolerance, Silo formulates a baseline understanding of the client's risk profile. Then, using financial information such as net worth, liquid net worth, and annual net income, Silo modifies the baseline risk profile. Additional modifiers are experience, employment, marital status, and number of dependents.

Maturity suitability uses the maturity date of the bond and two user-related inputs, timeline and liquidity. If a user's timeline is within 1 year and liquidity is of importance to them, a bond with a 10-year time horizon will rate low. Identical modifiers are used in maturity suitability. Using a combination of risk and maturity suitability, clients can understand their overall suitability for a certain bond. Silo places greater emphasis on risk suitability.

### Investment Strategies

**Long term trading** is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

**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 (leaving aside Treasury Inflation Protected/Inflation Linked Bonds) are not guaranteed or insured by the FDIC or any other government agency.

**Fixed income** investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best-known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury

defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal.

**Interest rate risk:** When interest rates rise, bond prices fall, meaning the bonds you hold lose value. Interest rate movements are a significant factor in price volatility in bond markets.

**Inflation risk:** Inflation is another source of risk for bonds investors. Bonds provide a fixed amount of income at regular intervals. But if the rate of inflation outpaces this fixed amount of income, the investor loses purchasing power.

**Credit risk:** Credit risk is the possibility that an issuer could default on its debt obligation. If this happens, the investor may not receive the full value of their principal investment. Investors can see credit ratings attached to any issuer.

**Liquidity risk:** Liquidity risk is the possibility that an individual, business, or financial institution cannot meet its short-term debt obligations

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

### 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

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

Neither Silo 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 Silo 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

Neither Silo nor its representatives have any material relationships to this advisory business that would present a possible conflict of interest.

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

Silo does not utilize nor select third-party investment advisers.

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

### A. Code of Ethics

Silo 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, Recordkeeping, Annual Review, and Sanctions. Silo's Code of Ethics is available free upon request to any client or prospective client.

### B. Recommendations Involving Material Financial Interests

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

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

Silo will not recommend to clients securities in which the firm or its representatives also invest.

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

Please see Item 11.C above.

## Item 12: Brokerage Practices

### A. Factors Used to Select Custodians and/or Broker/Dealers

Custodians/broker-dealers will be recommended based on Silo's duty to seek "best execution," which is the obligation to seek execution of securities transactions for a client on the most favorable terms for the client under the circumstances. Clients will not necessarily pay the lowest commission or commission equivalent, and Silo may also consider the market expertise and research access provided by the broker-dealer/custodian, including but not limited to access to written research, oral communication with analysts, admittance to research conferences and other resources provided by the brokers that may aid in Silo's research efforts. Silo will never charge a premium or commission on transactions, beyond the actual cost imposed by the broker-dealer/custodian. Silo may elect to cover the commission on transactions charged by broker-dealer/custodians.

Silo will require clients to use Interactive Brokers LLC.

### 1. Research and Other Soft-Dollar Benefits

While Silo has no formal soft dollar program in which soft dollars are used to pay for third party services, Silo may receive research, products, or other services from custodians and broker-dealers in connection with client securities transactions (“soft dollar benefits”). Silo may enter into soft-dollar arrangements consistent with (and not outside of) the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended. There can be no assurance that any particular client will benefit from soft dollar research, whether or not the client’s transactions paid for it, and Silo does not seek to allocate benefits to client accounts proportional to any soft dollar credits generated by the accounts. Silo benefits by not having to produce or pay for the research, products or services, and Silo will have an incentive to recommend a broker-dealer based on receiving research or services. Clients should be aware that Silo’s acceptance of soft dollar benefits may result in higher commissions charged to the client.

### 2. Brokerage for Client Referrals

Silo receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

### 3. Clients Directing Which Broker/Dealer/Custodian to Use

Silo will require clients to use a specific broker-dealer to execute transactions. Not all advisers require clients to use a particular broker-dealer.

## **B. Aggregating (Block) trading for Multiple Client Accounts**

Silo does not aggregate or bunch the securities to be purchased or sold for multiple clients. This may result in less favorable prices, particularly for illiquid securities or during volatile market conditions.

## **Item 13: Review of Accounts**

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

Robo-advisory portfolio management accounts are not reviewed by Silo, save for automated allocation revisions, which Silo does not engage in at this time. Clients are encouraged to update their account with any change in their objectives, risk tolerance, or other pertinent information, as that information factors into the portfolio’s composition. Clients will be given an annual notice regarding the opportunity to update any pertinent information in the event that their situation has changed.

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

Robo-advisory accounts do not undergo non-periodic review by Silo, although allocations may change based on material market, economic, or political events and/or changes to the client’s profile in accordance with Silo’s automated portfolio management.

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

Robo-advisory clients will receive at least quarterly a written report that details the client’s account including assets held and asset value, which report will come from the custodian.

## Item 14: Client Referrals and Other Compensation

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

Silo does not receive any economic benefit, directly or indirectly from any third party for advice rendered to Silo's clients.

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

Silo and its related persons do not receive an economic benefit (such as sales awards or other prizes) from any third party for providing investment advice to Clients.

Silo may also enter into arrangements with other intermediaries or firms for lead generation. Compensation could be cash or non-cash, such as for mutual exposure on each firm's (Silo and third-party) platforms.

Silo offers compensation to current Clients and promoters for referring new Clients. Silo has certain arrangements in which it pays third party affiliates (bloggers, influencer) who refer clients to Silo a flat fee per each referred Client. These programs could be structured to compensate influencers on a per-account basis or through a flat fee for each influencer campaign. In addition, Silo's client referral program or similar program offers small cash rewards, more favorable fee arrangements and/or reduced or waived brokerage fees for both the referring Client and the referred Client for each referral.

New Clients are advised of the compensation before opening the account. Referring Clients and promoters must adhere to terms and conditions established by Silo and set forth in an agreement with Silo in accordance with Securities and Exchange Commission New Marketing Rule. Referrals can only be made within the Silo Platform. Clients are not charged any fee or other costs for being referred to Silo by a current Client, marketer or promoter. These arrangements create an incentive for a third party or other existing Client to refer prospective Clients to Silo, even if the third party would otherwise not make the referral. Sometimes, these arrangements might have certain deposit limits to qualify. These arrangements also create a conflict of interest for a Client to maintain a certain level of assets managed through Silo if doing so would result in eligibility to receive an incentive, bonus or additional compensation.

## Item 15: Custody

When advisory fees are deducted directly from client accounts at client's custodian, Silo will be deemed to have limited custody of client's assets and must have written authorization from the client to do so. While Silo does not participate in advisory fees currently, clients will be given notice and the opportunity to provide written authorization in the event Silo chooses to do so. Clients will receive all account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy.

## Item 16: Investment Discretion

Silo does not have discretion over client accounts at any time.

## Item 17: Voting Client Securities (Proxy Voting)

Silo 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.

## Item 18: Financial Information

### A. Balance Sheet

Silo neither requires nor solicits prepayment of more than \$1,200 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 Condition Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

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

### C. Bankruptcy Petitions in Previous Ten Years

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

*This brochure supplement provides information about Hariharan Jayakumar that supplements the Silo Financial LLC brochure. You should have received a copy of that brochure. Please contact Hariharan Jayakumar if you did not receive Silo Financial LLC's brochure or if you have any questions about the contents of this supplement.*

*Additional information about Hariharan Jayakumar is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).*

## **Silo Financial LLC**

Form ADV Part 2B – Individual Disclosure Brochure

*for*

**Hariharan Jayakumar**

Personal CRD Number: 7665611

Investment Adviser Representative

Silo Financial LLC  
8807 Priest River Dr  
Round Rock, TX 78681  
(512) 954-0626  
[hariharan.jayakumar@silomarkets.us](mailto:hariharan.jayakumar@silomarkets.us)

UPDATED: ~~0912/25108~~/20232

## Item 2: Educational Background and Business Experience

**Name:** Hariharan Jayakumar      **Born:** 2002

### Educational Background and Professional Designations:

#### Education:

Bachelor's Aerospace Engineering, University of Texas at Austin - 2022

#### Business Background:

05/2022 - Present	Chief Executive Officer Silo Financial LLC
12/2017 - Present	<del>Self-Employed</del> (Youtuber) Youtube (Contractor)
11/2012 - 12/2017	Student

## Item 3: Disciplinary Information

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business.

## Item 4: Other Business Activities

[Hariharan Jayakumar runs a YouTube channel by the name "Logically Answered". He is the channel's sole owner and operator and makes business and tech-related content. He has amassed 500k subscribers.](#)~~Hariharan Jayakumar is currently managing a YouTube channel under the name "Logically Answered".~~

## Item 5: Additional Compensation

Hariharan Jayakumar does not receive any economic benefit from any person, company, or organization, other than Silo Financial LLC in exchange for providing clients advisory services through Silo Financial LLC.

### **Item 6: Supervision**

As a representative of Silo Financial LLC, Hariharan Jayakumar is supervised by Akhsheiy Tangutur, the firm's Chief Compliance Officer. Akhsheiy Tangutur is responsible for ensuring that Hariharan Jayakumar adheres to all required regulations regarding the activities of an Investment Adviser Representative, as well as all policies and procedures outlined in the firm's Code of Ethics and compliance manual. The phone number for Akhsheiy Tangutur is (512) 573-6017.

*This brochure supplement provides information about Akhsheiy Tangutur that supplements the Silo Financial LLC brochure. You should have received a copy of that brochure. Please contact Akhsheiy Tangutur if you did not receive Silo Financial LLC's brochure or if you have any questions about the contents of this supplement.*

*Additional information about Akhsheiy Tangutur is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).*

## **Silo Financial LLC**

Form ADV Part 2B – Individual Disclosure Brochure

*for*

### **Akhsheiy Tangutur**

Personal CRD Number: 7539667

Investment Adviser Representative

Silo Financial LLC  
8807 Priest River Dr  
Round Rock, TX 78681  
(512) 573-6017  
[akhsheiy.tangutur@silomarkets.us](mailto:akhsheiy.tangutur@silomarkets.us)

UPDATED: 09/28/2023



## Item 2: Educational Background and Business Experience

**Name:** Akhsheiy Tangutur      **Born:** 2002

### Educational Background and Professional Designations:

#### Education:

Bachelor's Business Administration - Accounting, University of Texas at Austin - 2023

#### Business Background:

05/2022 - Present	Chief Compliance Officer Silo Financial LLC
06/2022 - 08/2022	Internal Audit Intern Charles Schwab
07/2021 - 05/2022	Legal Assistant Lovins Trosclair PLLC
08/2019 - 03/2020	Brand Representative Abercrombie & Fitch
11/2012 - 08/2019	Student

## Item 3: Disciplinary Information

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business.

## Item 4: Other Business Activities

Akhsheiy Tangutur is not engaged in any investment-related business or occupation (other than this advisory firm).

## **Item 5: Additional Compensation**

Akhsheiy Tangutur does not receive any economic benefit from any person, company, or organization, other than Silo Financial LLC in exchange for providing clients advisory services through Silo Financial LLC.

## **Item 6: Supervision**

As the Chief Compliance Officer of Silo Financial LLC, Akhsheiy Tangutur supervises all activities of the firm. Akhsheiy Tangutur's contact information is on the cover page of this disclosure document. Akhsheiy Tangutur adheres to applicable regulatory requirements, together with all policies and procedures outlined in the firm's code of ethics and compliance manual.