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PART 2A OF FORM ADV: FIRM BROCHURE

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This brochure provides information about the qualifications and business practices of Double Finance Inc. ("Double Finance"). If you have any questions about the contents of this brochure, please contact us at 415.366.3893. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority.

Additional information about Double Finance is also available on the SEC's website at www.adviserinfo.sec.gov.

Registration with the SEC as a registered investment adviser pursuant to the Investment Advisers Act of 1940, as amended (the "Advisers Act"), does not imply a certain level of skill or training.

ITEM 2 MATERIAL CHANGES

As this is Double Finance's initial Brochure, there are no material changes to report. In the future, this section will be utilized to list and describe material changes since the previous annual ADV update.

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ITEM 4 ADVISORY BUSINESS

Double Finance Inc. (“Double Finance,” “Adviser,” “Firm”), a Delaware Corporation, was established in 2023 with an office in San Francisco, CA. The Firm is wholly owned by the James Maxwell Trust.

Double Finance provides an interactive investment platform (the “Platform”) to its clients. The Platform is only accessible through the internet. The Platform helps clients reach their financial goals by providing recommendations and investment strategies relative to level I and II assets tailored to each client’s preferences, objectives, net-worth, sophistication, and risk tolerance. As part of its advisory service offering, Double Finance also offers quantitative analysis and tax loss harvesting. Double Finance currently offers its services to individuals. Double Finance collects information from each client at time of onboarding and on an ongoing basis thereafter, including specific information about a client’s financial situation and overall investment objectives. Investment recommendations in the form of model portfolios are then generated and executed by Double Finance’s proprietary algorithm (“the Algorithm”) based on the information provided. Double Finance does not accept discretion over client assets; when a model portfolio is recommended, a client will decide whether or not to accept or implement such recommendation(s). Clients can also build their own portfolio by making adjustments to the recommended model at their own discretion, including asset and/or sector allocation, etc. Such activity does not constitute a recommendation from the Adviser. Once a client accepts the terms of a recommended model portfolio or creates one themselves, it will be executed by the Algorithm.

Double Finance offers clients the opportunity to transact in equities and ETFs. Investment opportunities may be limited by the access and abilities of the clearing firm. Double Finance does not participate in wrap fee programs.

Double Finance is an internet-based adviser registered with the SEC under reliance upon the Internet Adviser Exemption Rule 203A-2(e), as services are offered through an interactive, web-based platform that is accessible by phone application.

ITEM 5 FEES AND COMPENSATION

General

The Firm assesses fees monthly, in arrears. Fixed fees are \$20/month, in arrears. Fees are debited directly from client accounts.

Additional Fees and Expenses Payable by Clients

Clients may incur brokerage commissions, transaction fees, service provider fees, and other related costs and expenses directly from the custodian, issuer, or broker-dealer. Execution of client transactions may require payment of brokerage commissions by clients. “Item 12 – Brokerage Practices” further describes the factors that Double Finance considers in selecting or recommending broker-dealers for the execution of transactions and determining the reasonableness of their compensation (e.g., commissions). Investment activity may also involve other transaction fees payable by clients, such as sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. In addition, clients may incur certain charges imposed by outside custodians, broker-dealers, and other third parties, such as custodial fees, administrative fees, and transfer agency fees. Double Finance does not currently receive any payments from brokers, custodians, or any other third parties relating to its provision of investment advisory services.

ITEM 6 PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

Performance-Based Fees

Double Finance does not offer performance-based pricing to clients at this time.

Side-by-Side Management

Our Algorithm simultaneously provides recommendations to multiple accounts according to similar investment objectives. The simultaneous management of these different investment recommendations could create certain conflicts of interest. Double Finance recognizes that it has an affirmative duty to treat all such accounts fairly and equitably over time. Although Double Finance has a duty to treat all similarly managed (i.e., issued recommendations) accounts fairly and equitably over time, such portfolios will not necessarily be issued the same recommendations at all times. While the Adviser maintains a consistent recommendation approach across clients and accounts, account and portfolio composition may vary based upon the fact that recommendations are made on a discretionary basis, and the client chooses to implement all or none of such recommendations put forth by the Adviser. In general, investment recommendations for each client account will be made independently from those of other client accounts, and will be made with specific reference to the individual needs and objectives of each client account. As a result, although Double Finance makes recommendations to numerous accounts with similar investment objectives, or may make recommendations to accounts with different objectives that trade in the

same securities, the portfolio decisions, including those made by the client, relating to these accounts, and the performance resulting from such decisions, may differ from account to account.

ITEM 7 TYPES OF CLIENTS

Double Finance provides advice to individuals. Currently, the investment minimum is \$10,000; such minimum may be adjusted or waived in the Adviser's sole discretion.

ITEM 8 METHOD OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

Investment Strategies and Methods of Analysis

Double Finance utilizes proprietary, automated computer algorithms to create model portfolios and make recommendations of such portfolios based on a client's preferences and risk tolerance, among other criteria. Double Finance will present clients with recommended investments based on the financial information and investment preferences shared by the client.

Clients receive model portfolio advice from Double Finance, but retain discretion as to whether or not such recommendations will be followed, and may make other portfolio and transaction elections.

Risk of Loss

All investing and trading activities risk the loss of capital. Double Finance cannot guarantee any level of performance or that clients will not incur a loss of capital. The following risks are not meant to be all inclusive, but should be considered prior to engaging Double Finance for its advisory services.

Technology Risk

Advisers who rely on technology for the delivery of services, known as internet-based investment advisers, offer online investment management services using algorithms and automated processes.

Reliance on Algorithms

Double Finance's recommendations are based on algorithms that analyze market data and historical trends. While algorithms can be effective tools for decision-making, they are not infallible. They

may fail to account for certain market conditions, unexpected events, or changes in investment trends, which could lead to suboptimal investment outcomes.

Technology and Security Risks

Internet-based platforms are vulnerable to technological glitches, system failures, or cyber-attacks that could potentially compromise the security of your personal and financial information. Although Double Finance has security measures in place, there is always a risk of data breaches or unauthorized access to your account.

Overemphasis on Historical Data

Model portfolio recommendations are generated via the Algorithm and rely heavily on historical data to make investment recommendations. However, past performance is not always indicative of future results. Economic and market conditions can change, and over-reliance on historical data may overlook potential risks or fail to identify emerging investment opportunities.

Advisory Risk

There is no guarantee that Double Finance's algorithm, analysis, or recommendations pertaining to particular securities or strategies will produce the intended results. Our judgment may not be correct and clients may not achieve their investment objectives. In addition, there is a risk that Double Finance or its clients may experience computer issues, including equipment or Platform failure, loss of internet access, viruses, or other events that may impair our ability to provide advisory services.

General Market Risk

The price of any security or the value of an entire asset class can decline for a variety of reasons that Double Finance cannot control, including, but not limited to, changes in the macroeconomic environment, unpredictable market sentiment, forecasted or unforeseen economic developments, interest rates, regulatory changes, and domestic or foreign political, demographic, or social events.

Equity Securities Generally

The value of equity securities generally varies with the performance of the issuer and movements in the equity markets. Investors in equity securities may lose a substantial portion of their principal.

Company-Specific Risk: Company-specific risk, also known as unsystematic risk, is related to the specific company's performance and operations. It includes factors like management decisions, financial health, competition, and business model that can impact the performance of a particular stock.

Volatility: Stocks are often more volatile than other asset classes, meaning their prices can fluctuate significantly over short periods. High volatility can result in both substantial gains and losses.

Sector Risk: Investing heavily in a particular sector can expose you to sector-specific risks. For example, if you heavily invest in technology stocks, you are vulnerable to risks specific to the technology sector, such as changes in technology trends, regulatory actions, and competition.

Exchange Traded Funds and Notes (“ETF/ETN”) Risk

Investing in ETFs or ETNs carry additional risks, such as the risk of not having the same rights as direct shareholders (e.g. voting rights), paying additional or unexpected fees and charges, not being able to choose the investments within the ETF/ETN, the ETF/ETN not tracking its underlying index or asset accurately or consistently, or of facing unfavorable or complex tax consequences.

Fixed Income Risks

Interest Rate Risk: Fixed income securities, such as bonds, are sensitive to changes in interest rates. When interest rates rise, the value of existing bonds with lower yields decreases, as they become less attractive compared to newly issued bonds with higher yields. Conversely, when interest rates fall, the value of existing bonds increases. This risk is most pronounced for longer-term bonds.

Credit Risk: Credit risk, also known as default risk, is the risk that the issuer of a fixed income security will be unable to make interest payments or return the principal at maturity. The creditworthiness of the issuer is a critical factor in assessing this risk. Lower-rated bonds (e.g., junk bonds) generally have a higher risk of default.

Inflation Risk: Inflation erodes the purchasing power of the fixed interest payments from bonds. If the interest payments on a bond do not keep pace with inflation, the real return on the investment may be negative. To combat this risk, investors often look for bonds with inflation-adjusted features, such as Treasury Inflation-Protected Securities (TIPS).

Liquidity Risk: Some fixed income securities may have limited liquidity, making it difficult to buy or sell them in the market, particularly for less actively traded bonds. Illiquidity can lead to higher transaction costs and potential difficulties in exiting positions at desired prices.

Reinvestment Risk: Reinvestment risk arises when the interest or principal payments from a bond are reinvested at a lower interest rate than the original investment. This can occur when interest rates have declined since the initial investment, leading to lower future returns.

Call Risk: Callable bonds give the issuer the option to redeem the bonds before their maturity date. When interest rates fall, issuers may call bonds to refinance at a lower cost, leaving investors with the risk of having to reinvest their principal at lower interest rates.

Exchange Rate Risk (for international bonds): If you invest in fixed income securities denominated in a foreign currency, you are exposed to exchange rate risk. Changes in exchange rates can affect the value of your investment when translated back into your home currency.

ITEM 9 DISCIPLINARY INFORMATION

There are no legal or disciplinary events that are material to a client's evaluation of Double Finance or the integrity of our management or any employee of our Firm.

ITEM 10 OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

Neither Double Finance nor any of its management persons is registered, or have an application pending to register, as a broker-dealer or registered representative of a broker-dealer.

Neither Double Finance nor any of its management persons is registered, or has applied to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person thereof.

None of Double Finance's employees or officers have relationships with related parties in the financial services industry that materially affect Double Finance's advisory service or any member.

None of Double Finance' employees or officers recommend or select investment advisers for clients or have any business relationships with other investment advisers.

ITEM 11 CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

Our employees are permitted to invest in the same securities that are held by and/or recommended to clients in personal brokerage accounts held outside the Firm. Double Finance employees are eligible to hold accounts with Double Finance and invest alongside clients. As such, Double Finance has adopted a Code of Ethics that sets forth the standards of conduct expected of employees. All employees, including management, are required to comply with the provisions of the Code of Ethics. The Code of Ethics includes policies and procedures relating to personal trading, gifts and entertainment involving business associates, outside activities, charitable donations, as well as other

potential or actual conflicts of interest. All employees and officers must acknowledge receipt of the Code of Ethics and report any violations of the Code to the Chief Compliance Officer.

In addition, the Code of Ethics requires all employees including management to comply with certain rules designed to protect against insider trading. Pursuant to the Code of Ethics, upon commencement of employment, Double Finance’s employees who are designated as Access Persons are required to provide an initial holdings report disclosing all personal brokerage accounts, private placements, and investments of limited opportunity (e.g. “hedge funds”). In addition, employees must thereafter provide a personal trading report to the Compliance department within 30 days after the end of each calendar quarter. This report must include every securities transaction (excluding transactions effected in any account over which neither Double Finance nor the employee has any direct influence or control, and transactions in securities that are direct obligations of the Government Of the United States, bankers’ acceptances, bank certificates of deposit, commercial paper, and high quality short-term debt instruments, including repurchase agreements, or shares issued by registered open-end investment companies) in which the employee, the employee’s immediate family or trusts of which the employee is a trustee or in which the employee has a beneficial interest have participated during the quarter.

Certain personal trades must be pre-cleared by the Chief Compliance Officer, including investments in private placements and initial public offerings, as referenced above, and such pre-clearance will apply to initial public offerings and private placements, as further described in Double Finance’s Code of Ethics. Each employee is also required to provide an annual report of brokerage accounts and holdings along with an acknowledgement at least annually that the employee will comply with the provisions of the Code of Ethics.

Double Finance is required to keep copies of the Code of Ethics and all records relating thereto. Clients or prospective clients may obtain a copy of the Code of Ethics upon written request using the address on the front page of this Brochure.

ITEM 12 BROKERAGE PRACTICES

Double Finance utilizes qualified custodians to maintain custody of client assets. These same brokers will execute client transactions. Double Finance has a fiduciary duty to seek best execution (see further description below), and to ensure that trades are allocated fairly and equitably among clients over time.

Best Execution – Selection Factors for Broker / Dealers

As noted above, Double Finance has a duty to seek best execution of transactions for client accounts. “Best execution” is generally understood to mean the most favorable cost or net proceeds reasonably obtainable under the circumstances. In seeking best execution, Double Finance looks for the best

combination of transaction price, quality of execution (e.g., the speed of execution, the likelihood the trade will be executed, etc.), and other valuable services that an executing broker/dealer may provide.

Clients grant Double Finance the authority to select the broker/dealer to be used for the purchase or sale of securities. Double Finance, in seeking best execution, will make this selection based on a number of factors, which may include, but are not limited to, the following: the broker/dealer's financial soundness; the broker/dealer's ability to effectively and efficiently execute, report, clear, and settle the order; the broker/dealer's ability to commit capital; the broker/dealer's ability to timely and accurately communicate with Double Finance' trading desk and operations team; the broker/dealer's commission rates; the number of shares being purchased or sold; and similar factors. Double Finance does not consider any client referrals from a broker/dealer when determining best execution, or when placing client trades.

Double Finance is not obligated to choose the broker/dealer offering the lowest available commission rate if, in Double Finance's reasonable judgment, the total cost or proceeds from the transaction may be less favorable than what may be obtained elsewhere or if a higher commission is justified by the service and/or research provided by another broker/dealer.

Double Finance has implemented a policy to address the conflicts of interest associated with its brokerage practices. To determine that it is receiving best execution for its transactions over time, Double Finance will obtain information as to the general level of commission rates being charged by the brokerage community, from time to time, and may periodically evaluate the overall reasonableness of brokerage commissions paid on client transactions by reference to such data.

Directed Brokerage

Double Finance requires its clients to use a specified broker/dealer for portfolio transactions in their accounts. These brokers are the custodians who have been elected to maintain custody of client assets.

Cross Trades

Double Finance does not engage in cross transactions as a matter of policy.

Soft Dollars

Double Finance does not currently engage in soft dollar arrangements with its brokers or custodians.

Commission Sharing Arrangement

Double Finance does not currently engage in commission-sharing arrangements with its brokers or custodians.

Trade Aggregation and Trade Sequence

Double Finance seeks to utilize block trading whenever possible for discretionary account transactions. Selection will seek to favor best client execution. Accounts are subject to ongoing, randomized algorithmic analysis in order to make appropriate transaction selections for each account.

Initial Public Offerings

Double Finance does not offer investments in Initial Public Offerings to its clients at this time.

Trade Errors

Double Finance has established error correction procedures which provide that the resolution of errors be made in light of the Adviser's fiduciary duties and in placing an affected client's interest before that of the Firm. It is Double Finance' policy to resolve any error identified in a client account in a manner that the Firm believes results in no harm to the account.

In resolving trade errors, any net losses require reimbursement from Double Finance. Any net gains will be allocated to the client's account. Where the custodian/broker-dealer is the source of trade errors, Double Finance will seek reimbursement from such custodian/broker-dealer.

Double Finance Employee Investment Eligibility and Activity

Employees are eligible to hold accounts with Double Finance. The Firm maintains a Code of Ethics designed to address conflicts of interest associated with this practice.

ITEM 13 REVIEW OF ACCOUNTS

Double Finance has the ability to algorithmically review all accounts on an ongoing basis. Double Finance performs ongoing monitoring and rebalancing of client accounts through the multiple Algorithms. However, in circumstances where Double Finance has identified a discrepancy, a Double Finance employee will review such discrepancies and facilitate the reconciliation process with the custodian/ broker-dealer. Double Finance currently provides reports to clients only through its Platform. Statements are provided to clients by the Custodian on at least a quarterly basis, as

described in Item 15. Clients are responsible for updating their profile information, upon which recommendations are made. The Firm facilitates an annual review process for such information.

ITEM 14 CLIENT REFERRALS AND OTHER COMPENSATION

Double Finance does not receive economic benefits from third-parties for providing investment recommendations for client referrals.

Double Finance does not utilize third-party solicitors for the purposes of obtaining new clients. Double Finance may occasionally compensate current clients for referrals as permitted by the Investment Advisers Act of 1940 Rule 206(4)-1.

ITEM 15 CUSTODY

Double Finance has appointed an independent qualified custodian as its agent to hold custody of clients' funds and securities. Such custodian(s) may be broker/dealers, banks, trust companies, or other qualified institutions. The qualified custodian will provide the client with at least quarterly account statements relating to the assets held within the account managed by Double Finance. Each client should carefully review the qualified custodian's statement upon receipt to determine that it completely and accurately states all holdings in the client's account and all account activity over the relevant period. Any discrepancies identified by a client should be immediately reported to Double Finance and/or the qualified custodian. Such questions, concerns, or discrepancies may be communicated to Double Finance by writing, e-mailing, or telephoning us at the contact information listed in "Item 1 – Cover Page" of this Brochure.

ITEM 16 INVESTMENT DISCRETION

As noted above, the Adviser does not accept discretionary authority over client assets, and provides investment recommendations to self-directed accounts, which retain investment decision-making responsibility regarding all recommendations received from Double Finance.

ITEM 17 VOTING CLIENT SECURITIES

Double Finance does not have authority to vote securities on behalf of clients at this time.

ITEM 18 FINANCIAL INFORMATION

Double Finance does not require or solicit prepayment of fees from clients and does not have any financial condition that would impair its ability to meet contractual commitments to clients.

ITEM 19 REQUIREMENTS FOR STATE-REGISTERED ADVISERS

This item is not applicable to Double Finance.