



Helium
Investments

Form ADV Part 2
Client Brochure

A Registered Investment Advisor
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This brochure provides information about the qualifications and business practices of Helium Investments Inc. an SEC registered investment advisor. Registration does not imply a certain level of skill or training. Questions concerning this brochure should be directed to support@heliuminvestments.com. Additional information is also available at www.adviserinfo.sec.gov



Item 2 – Material Changes

Current Version

January 28th, 2017 - - - Initial Version



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Item 4 – Advisory Business

General Description

Helium Investments provides a complete portfolio management solution starting with an initial consultation and portfolio review, risk adjusted portfolio selection, continuous portfolio management and yearly updates of client suitability.

Helium Investments was founded in March of 2016, and has no funds under management at this time, but expect to exceed \$10M under management within the first 30 days after launch, through previous client arrangements and an aggressive marketing campaign.

Financial Advisory Services

Helium Investments provide clients with a comprehensive range of advisory solutions.

1) Clients can receive portfolio advice concerning their current portfolio with another financial services provider. After a call or in-depth questionnaire provided online that contains information about a client's unique financial circumstances (net assets, liquidation requirements, income, etc), along with basic personal information such as age, marital status, etc. We then analyze the assets in their portfolio to generate their estimated performance and determine if the assets are suitable for the client using our own suitability mechanism. A comparable portfolio with Helium Investments will be shown to the client, along with a summary of fee differences. In all likelihood, the client could be saving thousands of dollars per year in fees.

2) Existing clients receive advice about their current portfolio in relation to their goals and unique financial circumstances should they change. Advice is available over the phone or online with a registered Investment Advisor.

3) After completing a questionnaire about their financial circumstances and personal information online or by phone, new client receive advice on which of our risk adjusted portfolios are best suited to their financial circumstances. These portfolios are constructed using low fee ETF's, with a small percentage of cash to collect fees. Clients also have the option to purchase as a percentage of their holdings - Interest Based portfolios geared towards a particular investment group such as Clean Energy.

Clients are free to reject any recommendation of both the portfolio selection and advice they receive about existing portfolios with other financial services providers. Clients are under no obligation to act upon any of the recommendations provided.

Investment Management Services

Assets under management with clients of Helium Investments are managed solely on a discretionary basis and are only in the model portfolios offered by us. Management includes modification of existing



model portfolios to keep in line with the level of acceptable risk, periodic rebalancing, yearly client suitability updates and to issue transfers and in turn appropriate market buy or sell order. Tax loss harvesting and portfolio rebalancing are standard features available to all account holders. Rebalancing occurs quarterly at a set threshold defined in the Investment Policy Statement.

Helium Investments does not manage assets on a non-discretionary basis.



Item 5 – Fees and Compensation

General

Helium Investments does not charge a fee for any advice provided to new or existing clients. When clients seek advice for their existing portfolio with another financial institution, no fee is charged. Existing clients have unlimited access (within reason) to financial advice provided by a financial advisor and no fee is charged for this service. Fees are charged by us for Investment Management services, by the financial institution holding client assets (the custodian) and by the individual ETF providers. These fees are disclosed online and the fees incurred during each month are included on monthly statements.

Clients must agree to the fees charges during the signup process by signing their IPS.

Investment Management Fee

Helium Investments charges a fee based on the assets under management from %0.25 to %0.35 per year depending on the assets under management. This fee is calculated from the daily net liquidation value and collected no later than 10 business days from the end of the previous month.

Fees charged by Financial Institutions

There are fees charged by our custodian – Interactive Brokers for client accounts and services. The fees associated with holding an account are covered by Helium Investments. Fees associated with trades, some types of transfers and rebalancing are to be paid by the client. These fees vary based on the size of the transaction.

Clients may incur charges imposed by the ETF providers which typically range from %0.05 - %0.25 of holdings of any given ETF.

Helium Investments does not compensate employees based on performance or signups.



Item 6 – Performance Based fees and Side-by-Side Management

General

Helium Investments does not charge performance based fees, the only fee we charge is our Investment Management Fee.



Item 7 – Types of Clients

General

Helium Investments is an online financial advisor that offers risk adjusted and interest based portfolios to individual clients. We conduct an online questionnaire to determine the most suitable risk adjusted portfolio for clients and assign this portfolio to various types of accounts. In the United States we support Traditional IRA's, Roth IRA's, Beneficiary IRA's, Rollover IRA's and unregistered accounts. There is currently no account minimum, however funds are only invested after the account reaches \$100.

Portfolios are determined using a software algorithm and prior to being accepted and new client accounts are individually examined and verified by an IA.

We do not offer trusts, corporate account or joint accounts at this time.



Item 8 – Method of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis

For Portfolios – Helium Investments uses fundamental analysis to determine the makeup of our Risk Adjusted Model Portfolios. These portfolios have been created and analyzed by two separate CFA charter holders and back tested against the last 10 years for estimated return and risk levels. Risk has been determined by historical data with beta, gamma, standard deviation and covariance being analyzed. Our Interest Based portfolios also have a risk score associated with them calculated in the same manner as our Risk Adjusted portfolios.

For Investors – Helium Investments uses the KYC (Know Your Client) process to find the best portfolio for that individual's savings goals. The KYC consists of basic personal information (name, age, address, etc.), financial information (net worth, net income, liabilities, etc.) and several risk appetite questions. Both the Risk Appetite and Risk Tolerance are on a scale of 1-5, with 1 being the least risky.

Investment Strategies

The only securities offered are model portfolios in strictly long positions. These portfolios are actively managed through portfolio managers, and changed infrequently (approximately twice per year).

Tax loss harvesting, a standard industry practice of selling a losing asset and replacing it with a new asset of the same class, hereby 'realizing' the loss and offsetting some gains in the year for tax purposes is a standard feature.

Automatic rebalancing, the process of selling or buying assets when a model portfolio security class gain or loss has drifted more than certain percentage out of line with the model portfolio's original design. This feature is standard and helps keep assets in a model portfolio in line with the level of risk the client can tolerate.

Risk of Loss

As with any investment there is a risk that loss can occur.

An algorithm determines the suitable level of risk based on the KYC questionnaire and savings objectives. Because savings objectives vary and depending on age, retirement savings could for example be in a higher risk category than savings for a refrigerator.

Clients can request a change to a less risky portfolio online without intervention from an IA. When requesting a change to a riskier portfolio online, the client is contacted by email and then phone to determine the suitability of the change.



Item 9 – Disciplinary Information

General

Helium Investments is required to disclose any legal or disciplinary action with relation to its business practices and integrity of management.

We have no legal, financial or other disciplinary item to report. This statement applies to both our firm and every employee of our firm.



Item 10 – Other Financial Industry Activities and Affiliations

General

Helium Investments is not controlled and does not control any other entities. Helium Investments is not registered with another financial regulator.

Helium Investments is pending registration with the Ontario Securities Commission (OSC) in Canada.

Certain supervised individuals who perform regulated activities for American clients act in this capacity for Canadian clients as well.



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

General

We hold professionalism and ethical business practices in the highest regard. We have developed a 200+ page internal Policies & Procedures document that every client facing employee must read. These Policies & Procedures outline our commitment to our clients and include:

- Employees are not allowed to purchase any security offered by Helium Investments
- Employees are not allowed to disclose any information relating to client accounts to a 3rd party
- Statements and tax forms are delivered in a timely manner
- Supervised persons comply with regulations in the jurisdiction of both where they are located and the location of the client
- Investment Advisors and any employee of Helium Investments is strictly forbidden to disseminate non-public information
- Client transfers and orders are placed in a timely fashion, usually instantly

Clients may request a redacted version of our Policies & Procedures in writing to:

Helium Investments
250 University Ave
Suite 200
Toronto, Ontario
M5H 3E5



Item 12 – Brokerage Practices

General

Helium Investments uses Interactive Brokers LLC as our custodian on a fully disclosed basis. Client accounts are held in kind at Interactive Brokers, a SIPC member firm and insured for up to \$250k in the unlikely event of insolvency. Orders and client transactions are processed solely by Interactive Brokers.

Clients must agree to Interactive Brokers disclosures during the signup process which are also available on our website.

Helium Investments is not real-time with respect to transfer and order processing. Transfers requested collected daily and processed by 5am the next business day. Broker orders are generated and fulfilled on a best effort basis the next business day after client funds have been received by the custodian.

In an effort to gain best execution pricing, client orders may be aggregated prior to being processed by the broker.



Item 13 – Review of Client Accounts

General

Clients have access to real time information about their account balances, transfers, securities positions and more online and with our iOS and Android mobile applications. Clients are also notified online and in the app about when rebalancing occurs.

Accounts that have \$0 balance for more than 90 days are closed, after reminders about this to the client.

Helium Investments takes suitability of investments for clients very seriously. Therefore, we mandate that client suitability information is updated annually. Clients are reminded to update their suitability information 30, 60 and 90 days before their anniversary date.



Item 14 – Client Referrals and Other Compensation

General

No employee of Helium Investments is directly compensated for a client signup or based on the amount of funds under management.

From time to time Helium Investments will engage in promotions where existing clients can receive a bonus deposit or an amount of funds managed for free, depending on the number of clients they refer. We call this a referral bonus.

Helium Investments does not work with unaffiliated solicitors and no compensation is given outside of the referral bonus arrangement, with the exception of advertising partners which are paid one of: a flat fee for advertising (such as a newspaper), cost per click or cost per million impressions (such as online advertising).



Item 15 – Custody

General

Helium Investments uses Interactive Brokers LLC as our custodian. Clients can request access to the account that has been setup in their name with Interactive Brokers and can opt to receive a mailed monthly statement from us, in addition to the quarterly branded statement received from Interactive Brokers.

Clients should carefully review the agreements of Interactive Brokers available on our website.



Item 16 – Investment Discretion

General

Helium Investments has full authority to act as Discretionary Portfolio Manager with respect to client accounts.

This means that Helium Investments has full discretion to choose:

- The model portfolio
- The securities to be bought or sold
- The amount of securities to be bought or sold
- When orders are filled

Clients must sign the IPS (Investor Policy Statement), IMA (Investment Management Agreement) and RD (Relationship Disclosure) agreement prior to account opening.



Item 17 – Voting Client Securities

General

Helium Investments is required to disclose if it accepts authority to vote client securities. We do not vote client securities on behalf of our clients. Clients receive proxy materials directly from the Financial Institutions.



Item 18 – Financial Information

General

Helium Investments is not required to disclose any financial information as we do not collect the prepayment of advisory fees and do not have any adverse financial conditions that would impair our ability to meet our contractual commitments to clients.