

Item 1- Cover Page

OCTO Capital, LLC

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February 6, 2019

OCTO Capital, LLC
Form ADV Part 2A

This brochure provides information about the qualifications and business practices of OCTO CAPITAL, LLC. Being registered as a registered investment adviser does not imply a certain level of skill or training. If you have any questions about the contents of this brochure, please contact us at 248-731-7729. 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 OCTO CAPITAL, LLC (Firm CRD #174351) is available on the SEC's website at www.adviserinfo.sec.gov

Item 2: Material Changes

Annual Update

The Material Changes section of this brochure will be updated annually when material changes occur since the previous release of the Firm Brochure.

Material Changes since the last Update

There have been four material changes since the firm's last material update of October 2018.

1. Item 4 "Types of Advisory Services", service added: OCTO Capital may enter into an Independent RIA Co-Advisory Agreement with other independent Registered Investment Advisors ("Independent RIA") to provide discretionary asset management for their clients.
2. Item 4 "Client Assets Under Management" updated
3. Item 5 "Fees and compensation" updated
4. Item 7 "Types of clients" (type of clients added: Independent Investment Advisers)

Full Brochure Available

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at: 248-731-7729 or by email at: info@octo-capital.com

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Item 4 – Advisory Business

Firm Description

OCTO CAPITAL, LLC, (“Advisor”) was founded in June 2013 and began offering investment advisory services in January 2015. The principal owner is Daniel B. Shub. OCTO Capital provides portfolio management and financial planning services, including investment advice to individuals, families, ERISA retirement plans and other independent financial advisors. Portfolio management services include developing an investment policy statement, building portfolio recommendations and implementing these recommendations at a third-party custodian (see Custody). Portfolio management services also include the ongoing monitoring of the investment portfolio, asset allocation analysis, rebalancing and tax-loss harvesting recommendations. Investment recommendations are primarily limited to open-end mutual funds, exchange-traded funds, and limited amount of individual stocks. We also serve to help clients with existing positions in individual stocks.

All client portfolios are customized and built for each individual relationship, although many clients will hold similar securities and allocations. The portfolio construction process begins with a discussion of the client's goals and risk tolerance to determine a suitable long-term investment portfolio. We do not participate in wrap fee programs and investment management fees are not linked to a client's portfolio performance.

Financial planning services include retirement income planning, education funding planning, stock compensation planning, insurance needs analysis, multi-generational financial planning and philanthropic planning.

The firm does not sell commissioned products. The firm’s managing member is affiliated with entities that sell insurance products.

Other professionals (e.g., lawyers, accountants, tax preparers, insurance agents, etc.) are engaged directly by the client on an as-needed basis and may charge fees of their own. For example, tax preparation and to the extent your estate plan needs to be updated, the tax preparer and/or attorney will bill the client separately. Conflicts of interest will be disclosed to the client in the event they should occur.

Types of Advisory Services

The investment advisory services of OCTO Capital described in this disclosure brochure are provided to you through an appropriately registered and qualified individual who is an investment adviser representative of OCTO Capital or by an investment adviser representative of an Independent Registered Investment Adviser that has entered into an agreement with OCTO Capital to provide investment management services for clients (referred to as your investment adviser representative throughout this brochure). Your investment adviser representative is typically limited to providing the services and charging investment advisory fees in accordance with the descriptions detailed in this brochure. Your investment adviser representative is generally allowed to set OCTO Capital's fee within a range prescribed by OCTO Capital. As a result, the rates actually charged by two different investment adviser representatives of OCTO Capital or an associated Independent Registered Investment Adviser may vary for similar services.

Asset Management

Advisor offers discretionary direct asset management services to advisory clients and may enter into an Independent RIA Co-Advisory Agreement with other independent Registered Investment Advisors ("Independent RIA") to provide discretionary asset management for their clients. Advisor will offer clients ongoing portfolio management services through determining individual investment goals, time horizons, objectives, and risk tolerance. Investment strategies, investment selection, asset allocation, portfolio monitoring and the overall investment program will be based on the above factors. The client will authorize Advisor discretionary authority to execute selected investment program transactions as stated within the Investment Advisory Agreement.

Financial Planning and Consulting

If financial planning services are applicable, the client will compensate Advisor on a negotiable fixed fee or an hourly fee basis described in detail under "Fees and Compensation" section of this brochure. Services include but are not limited to a thorough review of all applicable topics including Wills, Estate Plan/Trusts, Investments, Taxes, and Insurance. If a conflict of interest exists between the interests of the investment advisor and the interests of the client; the client is under no obligation to act upon the investment advisor's recommendation. If the client elects to act on any of the recommendations, the client is under no obligation to effect the transaction through Advisor. Financial plans will be completed and delivered inside of sixty (60) days. Clients may terminate advisory services with seven (7) days written notice.

eMoney Advisor

In conjunction with the services provided by eMoney Advisor, OCTO Capital, LLC may also provide access to account aggregation services, which can incorporate all of the client's investment assets, including those investment assets that are not part of the assets that we manage (the "Excluded Assets"). The client and/or his/her/its other advisors that maintain trading authority, and not us, shall be exclusively responsible for the investment performance of the Excluded Assets. In addition, eMoney will also provide access to other types of information, including financial planning concepts, which should not, in any manner whatsoever, be construed as services, advice or recommendations provided by OCTO Capital, LLC. OCTO Capital, LLC does not provide investment management, monitoring or implementation services for the Excluded Assets. The client may engage OCTO Capital, LLC to provide investment management services for the Excluded Assets pursuant to the terms and conditions of the Investment Advisory Agreement between OCTO Capital, LLC and the client.

Newsletters

Advisor provides newsletters to clients and prospective clients. They are provided by e-mail and occasionally by U.S. mail. Newsletters are educational and informational in nature and no recommendations are made and no personalized investment advice is given. Newsletters are provided free of charge.

Seminars and Workshops

Advisor provides workshops for current or prospective clients that are educational and informational in nature. No recommendations are made and no personalized investment advice is given. Workshops are provided free of charge. Participants may contract with us for individualized advisory services, but are under no obligation to do so.

Client Tailored Services and Client Imposed Restrictions

The goals and objectives for each client are documented in our client files. Investment strategies are created that reflect the stated goals and objective. Clients may impose restrictions on investing in certain securities or types of securities. Agreements may not be assigned without written client consent.

Client Assets under Management

As of February 2019, Advisor currently has \$40,091,148 Discretionary and \$125,000 Non-discretionary assets under management.

Item 5 – Fees and Compensation

OCTO Capital is compensated only by the quarterly advisory fee based on a percentage of assets under management or fixed planning fees paid by its clients. OCTO Capital is not affiliated with a broker/dealer, and as such do not carry licenses necessary to receive securities commissions. Advisory fees are paid quarterly in advance, based upon the market value of the assets on the last business day of the previous quarter pursuant to the fee agreed to in Schedule D of the Advisory Agreement. For the initial billing period the fee is pro-rated for the remainder of the quarter (if services commenced in the middle of a calendar quarter), this pro-rated fee is billed on the first business day of the month following the commencement of services. Should a client terminate the relationship with OCTO Capital, the unearned portion of the retainer fee will be refunded. Clients terminating their contract with OCTO Capital within the first five days are entitled to a full refund. Clients may elect to pay this fee directly or have the fee deducted quarterly from investment accounts.

The investment advisory fee will be billed directly to the Custodian. The Custodian will deduct the fee for the Account upon receipt of the invoice, or shortly thereafter. Client shall be given thirty (30) days prior written notice of any increase in fees, and client will acknowledge, in writing, any agreement of increase in said fees.

OCTO Capital's negotiable annual investment advisory fee will be based upon a percentage of the market value of assets under management. The annual investment advisory fee will generally range between 0.20% and 1.5% subject to the terms and conditions of the Investment Advisory Agreement, depending upon various factors including but not limited to: the amount of assets to be managed; account composition; the scope and complexity of the engagement; the anticipated number of meetings and servicing needs; related accounts; future earning capacity; anticipated future additional assets; the professional(s) rendering the services(s); and negotiations with the client. As a result of these factors, similarly situated clients could pay different fees. Moreover, the services to be provided by OCTO Capital to any particular client could be available from other advisers at lower fees. All clients and prospective clients should be guided accordingly.

Clients may incur fees from the custodian selected to provide services related to record keeping, tax reporting and statement production. These fees may include IRA and retirement account annual fees, nominal trade ticket charges or banking fees. No portion of these fees is retained by or remitted to OCTO Capital.

Clients may elect to engage OCTO Capital to provide Financial Planning and Consulting Services only. This service is done on a fixed fee basis, ranging from \$500 to \$10,000 per plan or on an hourly fee of \$350 per hour. Upon plan delivery, you may engage our firm to assist you in its execution and monitor your progress. To do this we assess a monthly fee of \$50 to \$500, paid in advance each month. We require the first month's fee to be paid upon engagement. Fees for our planning services and ongoing support take into consideration factors such as the complexity of your financial profile; the time involved developing your

plan and assisting you in its execution, assets that comprise your overall portfolio, as well as the number of individual accounts comprising the portfolio.

Fees for financial plans are billed 50% in advance, with the balance due upon delivery of the financial plan.

All fees paid to OCTO Capital for financial planning and consulting services are separate and distinct from the asset management fees charged by an investment adviser to implement such recommendations.

Item 6 – Performance-based fees

We do not charge performance-based fees.

Item 7 – Types of Clients

Our firm works primarily with individuals and families but may also serve retirement plans, foundations, endowments, non-profit organizations and other Investment Advisors.

We do not require a minimum to open an account. However, we may review the situation on the individual basis to insure we can provide services in the client's best interest.

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

Research proves that passive investing works for all investors, regardless of size or scope. Our investment strategy begins with a general long-term acceptance of the Efficient Market Hypothesis, which states that the primary driver of a portfolio's risk and return characteristics is determined by asset allocation, and not security selection. As countless studies have proven, active management as a whole, underperforms the market portfolio, and attempting to pick investments or investment managers which will outperform the market is more an act of luck than skill. To protect our clients from the needless costs of active management and the inevitable underperformance that results, clients are advised to invest in passive strategies, also known as index funds. Using the knowledge and tools provided by financial science, we build portfolios with focused exposure to key "factors" of returns, such as company size, relative price (value), profitability and momentum. This exposure largely determines a portfolio's risk and return. The primary vehicles recommended to OCTO Capital clients are institutional mutual funds, which may include exchange-traded mutual funds.

As with any stock-based investment, mutual funds, including passively managed mutual funds, carry the risk of losses. While we can reduce company-specific risk through diversification, eliminate manager-risk with passive portfolios and reduce overall portfolio volatility with a broad mix of stocks, bonds and other assets, we cannot eliminate the risk of fluctuation that comes with investing in stocks and bonds. It is always possible in any given week, month or year that an investor's portfolio value could be less than the previous period. The Efficient Market Hypothesis dictates that it is this market risk that offers investors potential long-term rewards, so we aim to reduce other previously mentioned risks wherever possible.

Item 9 – Disciplinary Information

Neither Daniel Shub nor any employees of OCTO Capital have ever been convicted of, pled guilty or no contest to any felony or misdemeanor in a criminal or civil action in any foreign or domestic court. Neither Daniel Shub nor any employees of OCTO Capital have ever been part of a proceeding before the SEC, FINRA

or any other industry regulatory agency. Neither Daniel Shub nor any employees of OCTO Capital have ever been part of a self-regulatory organization's proceeding.

Item 10 – Other Financial Industry Activities and Affiliation

Neither Daniel Shub or any employees of OCTO Capital are registered, or applying to register, as a broker-dealer, or registered representative of a broker-dealer, or futures commissions merchant, commodity pool operator, or commodity trading advisor.

Neither Daniel Shub or any employee of OCTO Capital has a relationship with a broker dealer, municipal securities dealer, government securities dealer or broker, investment company, outside investment adviser, banking or thrift institution, accounting firm, law firm, pension consultant, real estate broker, sponsor or syndicator of limited partnerships.

Material Relationship Maintained by this Advisory Business and Conflicts of Interest

Daniel Shub is a licensed Life insurance agent and an owner of Shub & Company, LLC, which is under common control and ownership. Shub & Company, LLC is an insurance agency offering Life insurance, Medicare Advantage and Medicare Supplement plans and annuities. From time to time, he may offer clients advice or products from this activity. Less than 10% of Mr. Shub's time is spent in his insurance practice. This practice represents a conflict of interest because it gives Mr. Shub an incentive to recommend products based on the commission amount received. This conflict is mitigated by the fact that Mr. Shub has a fiduciary responsibility to place the interests of the client first and clients are not required to purchase any products. Clients have the option to purchase these products through another insurance agent of their choosing.

Recommendations or Selections of Other Investment Advisors and Conflicts of Interest

We do not utilize nor select third-party investment advisers.

Independent Investment Advisers

Certain persons offering the asset management services of OCTO Capital own or are affiliated with independent investment advisory firms (individually "Independent Investment Adviser" or collectively "Independent Investment Advisers"). These Independent Investment Advisers may utilize the financial planning and asset management services of OCTO Capital. Clients that engage such an independent Investment Adviser will receive a copy of the Independent Investment Adviser's firm disclosure document and will execute a client agreement specifying the services provided and fees charged by the Independent Investment Adviser and the role of OCTO Capital with respect to such services.

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

As a Registered Investment Adviser, OCTO Capital has a fiduciary duty to its clients. In the simplest of terms this means that our first obligation is to put the client's needs above all other interests or conflicts. OCTO Capital takes our fiduciary duty very seriously and has built our business model around our obligation to

minimize conflicts of interest with our clients and to truly make recommendations that are in their best interests.

OCTO Capital's owner and employees will adhere to all federal and state securities laws and regulations. All OCTO Capital related persons will be held to the highest standard of conduct and shall not withhold pertinent information from clients regarding securities recommendations, act to deceive or defraud any client or outside party, or otherwise partake in any activity with the intent to deceive or defraud any regulatory body, government office or client.

OCTO Capital's owner and employees may buy or sell securities for themselves which are also recommended to clients, which represents a conflict of interest. In an effort to avoid conflicts of interest, OCTO Capital monitors and supervises the personal securities transactions of all employees and its owner. Monitoring is conducted by Daniel Shub, Managing Member and Chief Compliance Officer of OCTO Capital. OCTO Capital retains records of all securities transactions conducted by employees and owners. For compliance purposes with regulations, all employees and the owner are considered "access persons" whose transactions will be monitored.

As a matter of principle, OCTO Capital's owner and employees are to withhold public comment regarding advice on individual securities, as to avoid conflicts of interest when these comments may enrich the OCTO Capital associated person.

Item 12 – Brokerage Practices

In general, price (cost of commissions) and trade execution are the primary drivers of a decision to recommend broker-dealers for client transactions. We work primarily with TD Ameritrade Institutional.

Soft dollars: OCTO Capital may receive an economic benefit from external sources in the form of the support products and services they make available to us and other independent investment advisors. The availability to us of an external source's products and services is not based on our offering particular investment advice, such as buying particular holdings for our clients. OCTO Capital does receive research or products and services from TD Ameritrade Institutional in connection with client securities transactions. This includes securities research and a trading platform. As a practice, OCTO Capital does not rely on the research provided by TD Ameritrade. The trading platform provides significant business efficiency which benefits our clients. As well, it is very common for custodial broker-dealers to provide trading access to client accounts. All broker-dealers that our clients work with provide investment transaction and pricing data so that we are able to accurately track investment performance.

OCTO Capital does not receive client referrals from any broker-dealers.

Directed Brokerage: While OCTO Capital would permit clients to request directed brokerage, the majority of our clients are individuals who generally have transactions executed at TD Ameritrade. OCTO Capital does not encourage directed brokerage, which is more common for mutual fund or pension fund managers regularly trading equities.

Trade Aggregation: We may aggregate ETF trade when possible in order to obtain best execution. If OCTO Capital decides to purchase or sell the same security for several clients at approximately the same time, allocations are done in an equitable fashion, typically on a pro rata basis.

Item 13 – Review of Accounts

Daniel Shub, Managing Member of OCTO Capital, reviews each client’s portfolio no less frequently than once per quarter. At the end of each quarter OCTO Capital reviews an updated Asset Allocation analysis and trailing period performance report for all investment management clients. The Asset Allocation report is then compared to the client’s signed Investment Policy Statement to analyze the variance from the target portfolio allocation. Additionally, performance is compared to broad market averages to ensure that the client is capturing as much of the long-term return of the market as possible. Clients will also receive monthly statements from their custodian (i.e. TD Ameritrade Institutional). Accounts are also reviewed during an annual portfolio review meeting with the firm’s clients.

Item 14 – Client Referrals and Other Compensation

No one outside of OCTO Capital’s owner and employees provides investment advice to OCTO Capital clients (exclusive of outside relationships our clients may choose to have, or Independent Registered Investment Advisers who entered into an Independent RIA Co-Advisory Agreement). OCTO Capital does not compensate outside parties for client referrals. This includes existing clients or other outside professionals (such as CPAs, attorneys, etc.). OCTO Capital does not share revenue or pay “finders fees” for client referrals.

Item 15 – Custody

OCTO Capital does not take custody of client assets or provide custodial services apart from authorized fee withdrawals. All clients work with a third-party custodian (TD Ameritrade Institutional) for handling of cash and securities, from which clients receive monthly (or quarterly) brokerage statements, and tax reporting.

Item 16 - Investment Discretion

OCTO Capital accepts discretionary authority over clients’ investment portfolio under our management, including the type of security and number of shares. However, we prefer to discuss all transactions with clients before any trades are placed in client accounts. Having discretion over mutual fund and ETF trades allows us to be more flexible for those clients who prefer not to discuss each trade with us.

The client approves the custodian to be used and the commission rates paid to the custodian. Advisor does not receive any portion of the transaction fees or commissions paid by the client to the custodian on certain trades.

Item 17 – Voting Client Securities

OCTO Capital does not proxy vote for our clients’ investment positions. Clients will receive proxy solicitations directly from the custodian. We are happy to discuss these solicitations with our clients.

Further, we will have no power, authority, responsibility, or obligation to take any action with regard to any claim or potential claim in any bankruptcy proceeding, class action securities litigation or other litigation or proceeding relating to securities held at any time in a client account, including without limitation, to file proofs of claim or other documents related to such proceeding, or to investigate, initiate, supervise, or monitor class action or other litigation involving client assets.

Item 18 – Financial Information

A balance sheet is not required to be provided because OCTO Capital does not serve as a custodian for client funds or securities and does not collect asset management fees for a period of greater than one quarter. OCTO Capital has no outstanding liabilities or financial impairments that would inhibit our ability to provide promised services to clients. OCTO Capital does not require or solicit fees of \$500 or more six months or more in advance. Neither OCTO Capital nor its management has had any bankruptcy petitions in the last ten years.

Item 19 – Requirements for State Registered Advisors

Education and business background, including any outside business activities for all management and supervised persons can be found in the Supplement to this Brochure (Part 2B of Form ADV Part 2).

Material Relationship Maintained by this Advisory Business or Management persons with Issuers of Securities

None to report

Daniel B. Shub

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Supervising Person Brochure
Form ADV Part 2B

This brochure supplement provides information about Daniel B. Shub and supplements the OCTO CAPITAL, LLC's brochure. You should have received a copy of that brochure. Please contact OCTO CAPITAL, LLC if you did not receive the brochure or if you have any questions about the contents of this supplement.

Additional information about Daniel B. Shub (CRD #4148417) is available on the SEC's website at www.adviserinfo.sec.gov

Brochure Supplement (Part 2B of Form ADV)

Supervising Person Brochure

Principal Executive Officer

Daniel B. Shub

Year of birth: 1973

Item 2 – Educational Background and Business Experience

Educational Background:

LTPA, Ukraine, Bachelor's Degree in Production Automation; 1992

Business Experience:

OCTO Capital, LLC; Investment Advisor Representative; 12/2014 – Present

OCTO Capital, LLC; Managing Member; 05/2013 – Present

Shub & Company, LLC; Owner/Life Insurance agent; 09/2013 – Present

Gold Star Insurance Group, LLC; Owner 06/2012 – Present

Global Financial Private Capital, LLC; Investment Advisor Representative; 02/2014 – 12/2014

5 Star Insurance Agency, LLC; Partner; 09/2005 – 09/2012

Michigan Community Benefits/Michigan Community Insurance; Advisor/Life Insurance Agent; 04/2003 – 06/2012

Accredited Investment Fiduciary® (AIF®)

The AIF Designation certifies that the recipient has specialized knowledge of fiduciary standards of care and their application to the investment management process. To receive the AIF Designation, the individual must meet prerequisite criteria based on a combination of education, relevant industry experience, and/or ongoing professional development, complete a training program, successfully pass a comprehensive, closed-book final examination under the supervision of a proctor and agree to abide by the Code of Ethics and Conduct Standards. In order to maintain the AIF Designation, the individual must annually attest to the Code of Ethics and Conduct Standards, and accrue and report a minimum of six hours of continuing education. The Designation is administered by the Center for Fiduciary Studies, the standards-setting body of fi360.

Registered Financial Consultant® (RFC®)

The Registered Financial Consultant (RFC) is a professional designation awarded by the International Association of Registered Financial Consultants to those financial advisors who can meet the high standards of education, experience and integrity required of all its members. Applicant must possess a baccalaureate or graduate degree in financial planning services or hold one of the following professional degrees or designation: AAMS, CFA, CFP, ChFC, CLU, CPA, EA, JD. Alternatively, a candidate may complete a CFP-equivalent course at an accredited institution or an IARFC approved curriculum and passed a written examination. Each applicant must have at least four years of professional experience in the field of financial planning or financial services, meet local licensing requirements, and adhere to the RFC Code of Ethics. The RFC designation requires 40 hours of Continuing Education every year, including two hours of business ethics every two years.

- Experience. Applicant must have a minimum of four years' experience as a full-time practitioner or educator in the field of financial planning or financial services.
- Education. Applicant must have earned a baccalaureate or graduate degree in financial planning services with strong emphasis in subjects relating to economic, accounting, business, statistics, finance, and similar studies; or have earned one of the following professional degrees or designation: AAMS, CFA, CFP®, ChFC, CLU, CPA, EA, JD, or completed a CFP® equivalent or IARFC approved curriculum at an accredited college or university. The new Financial Planning Process™ course curriculum qualifies.
- Examination. The educational curriculum must have included a written examination process. If not, an experienced candidate must pass an RFC challenge examination.
- Licensing. Applicant must have met local licensing requirements for all products offered, such as securities, life and health insurance; or an applicant who is a fee-only planner or trust officer and is not licensed must submit information on the applicant's RIA or ARIA affiliation or business conduct procedures.
- Integrity. Applicant must have a clean record of personal and business integrity with no suspensions or revocation of any professional licenses.
- Ethics. Applicant must subscribe and continually adhere to the RFC Code of Ethics. o Continuing Education. All members must conduct a minimum of 40 hours per year of Professional Continuing Education in the field of personal finance and professional practice management.
- Ethics CE. Must complete an IARFC approved CE course or curriculum on operational ethics and standards of conduct consisting of two units every two years. (First 2-year period commences 2009)
- Compliance. Annually the RFC® must provide assurance of continued compliance and operation.
- Plan Writing Capacity. Must provide evidence that the member can produce a high-quality personal financial plan. (Effective 2009) The Financial Planning Process™ includes this component, but the applicant may use any planning structure or software.

Item 3 – Other Business Activities Engaged In

Daniel Shub has a financial industry affiliated business as a Life insurance agent. Less than 10% of his time is spend in his insurance practice. From time to time, he may offer clients advice or products from these activities. Clients are not required to purchase any products. This practice represents a conflict of interest because it gives Mr. Shub an incentive to recommend products based on the commission amount received. This conflict is mitigated by the fact that Mr. Shub has a fiduciary responsibility to place the interests of the client first and clients are not required to purchase any products. Clients have the option to purchase these products through another insurance agent of their choosing.

Item 4 – Additional Compensation

Mr. Shub receives separate, yet typical commissions from insurance companies on the insurance products he sells. He does not receive any performance-based fees.

Item 5 – Disciplinary Actions

None to report

Item 6 – Supervision

Since Mr. Shub is the sole owner of OCTO CAPITAL, LLC, he is solely responsible for all supervision and formulation and monitoring of investment advice offered to clients. He will adhere to the policies and procedures as described in the firm's Compliance Manual.

Item 7 – Requirements for State-Registered Advisors

There are no Arbitration Claims, Self-Regulatory Organization or Administrative Proceeding or Bankruptcy Petitions to report.

Alicia Renee Dion

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Form ADV Part 2B

This brochure supplement provides information about Alicia R. Dion and supplements the OCTO CAPITAL, LLC's brochure. You should have received a copy of that brochure. Please contact OCTO CAPITAL, LLC if you did not receive the brochure or if you have any questions about the contents of this supplement.

Additional information about Alicia R. Dion (CRD #7015544) is available on the SEC's website at www.adviserinfo.sec.gov

Brochure Supplement (Part 2B of Form ADV)

Investment Advisor Representative
Alicia Renee Dion
Year of birth: 1992

Item 2 – Educational Background and Business Experience

Educational Background:

The University of Huddersfield, England, Bachelor's Degree in Events Management

Business Experience:

OCTO Capital, LLC; Investment Advisor Representative; 10/2018 – Present

OCTO Capital, LLC; Office Manager and Marketing Associate; 01/2017 – Present

Shub & Company, LLC; Life Insurance Agent; 09/2018 – Present

Shub & Company, LLC; Office Manager; 01/2017 – Present

Item 3 – Other Business Activities Engaged In

Alicia Dion is also in a financial industry affiliated business as a life insurance agent. Less than 20% of her time is spent in her insurance practice. From time to time, she may offer clients advice or products from these activities. Clients are not required to purchase any products. This practice represents a conflict of interest because it gives Ms. Dion an incentive to recommend products based on the commission amount received. This conflict is mitigated by the fact that Ms. Dion has a fiduciary responsibility to place the interests of the client first and clients are not required to purchase any products. Clients have the option to purchase these products through another insurance agent of their choosing.

Item 4 – Additional Compensation

Ms. Dion will receive separate commissions from insurance companies on the insurance products she sells. She does not receive any performance-based fees.

Item 5 – Disciplinary Actions

None to report

Item 6 – Supervision

Alicia Dion is an IAR of OCTO CAPITAL, LLC, and is supervised on the formulation and monitoring of investment advice offered to clients by Daniel Shub. She will adhere to the policies and procedures as described in the firm's Compliance Manual.

Item 7 – Requirements for State-Registered Advisors

There are no Arbitration Claims, Self-Regulatory Organization or Administrative Proceeding or Bankruptcy Petitions to report.