

Client Relationship Summary | March 26, 2025

Athena Advisory Inc. is registered with the Securities and Exchange Commission as an investment adviser. Brokerage and investment advisory services and fees differ, and it is important for you to understand the differences. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://www.investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing.

What investment services and advice can you provide me?

We offer investment advisory services to retail investors, which principally include algorithmic recommendations with respect to investments and other financial decisions through an interactive website (the "Website"). Retail investors may elect to adopt our recommendations on their own or may elect to have our Website implement our recommendations on their behalf through the grant of discretionary authority. Our discretionary authority to buy, sell, and otherwise transact in securities in your account(s) is granted in our advisory agreement and is only limited by your reasonable restrictions or our mutual ability to terminate the advisory agreement. When providing non-discretionary advisory services for your own implementation, you make the ultimate decision regarding the purchase or sale of investments or other financial products. Our advice is not limited to certain types of investments. We do not offer proprietary products. We do not have a minimum account size or investment amount to retain or maintain our advisory services.

Regular monitoring of your account(s) is included as part of our standard advisory services through our algorithm and Website, with household information refreshed monthly (subject to user confirmation and continued access to necessary data fees via the application program interface). It is important that you keep us apprised of your financial situation so we can conduct more frequent reviews if necessary.

More detailed information about our services may be found in [Items 4 and 7 of our Form ADV Part 2A Firm Brochure](#).

Conversation Starters

"Given my financial situation, should I choose an investment advisory service? Why or why not? How will you choose investments to recommend to me? What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?"

What fees will I pay?

Retail investors that elect to have our recommendations implemented through our algorithm and Website will generally incur a recurring monthly fee of \$24 per month, payable in arrears via electronic funds transfer, debit card, or credit card. Such fees may evolve and change over time. Users of the Website will not pay a fee to us if the recommended investment and financial action items are to be implemented solely by you. In addition, retail investors will also generally incur the following fees and costs charged by third parties: custodian fees, account maintenance fees, product expenses such as internal expense ratios, and transaction charges.

Since we charge a recurring fixed fee to have our recommendations implemented through our algorithm and Website, we have an incentive to encourage you to do so (and to not implement such recommendations on your own). This creates a conflict of interest.

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.

More detailed information about our fees and costs may be found in [Item 5 of our Form ADV Part 2A Firm Brochure](#).

Conversation Starters

"Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?"

What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?

When we act as your investment adviser, we must act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and

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ask us about these conflicts because they can affect the investment advice we provide you. Here are some examples to help you understand what this means.

The custodian(s) we recommend provide us various products and services that are intended to directly benefit you, us, or both of us. To the extent a custodian provides us products or services that don't directly benefit you, this creates an incentive to recommend that custodian. To learn how we address this incentive, please refer to [Item 12 of our Form ADV Part 2A Firm Brochure](#).

We will be compensated by certain independent and unaffiliated third-party financial services companies ("Independent Partners") through various referral and/or revenue sharing arrangements that will be dependent upon users purchasing a particular product or using a particular service of such Independent Partners through the Website. By way of example, it is envisioned that (i) Independent Partner banks will agree to pay Adviser a referral fee for Adviser's users that become lending clients of such banks; (ii) Independent Partner mortgage companies will agree to pay Adviser a referral fee for Adviser's users for mortgages, refinancing, and home equity lines of credits that become lending clients of such mortgage companies; (iii) Independent Partner insurance companies will agree to pay Adviser a referral fee for Adviser's users that become clients of such insurance companies; (iv) certain Independent Partners will pay Adviser an advertising fee to place a clickable advertisement on the Website; and (viii) certain Independent Partners will pay Adviser to have their financial products available as part of the Website's universe of recommended financial products and action items. Such arrangements will likely evolve and change over time, and updates to this Client Relationship Summary will be made accordingly. Regardless, all such arrangements create a conflict of interest due to the financial incentive that we have to incorporate such Independent Partners' products and services into the Website and to recommend them to users. To learn how we address this incentive, please refer to [Item 5 and Item 10 of our Form ADV Part 2A Firm Brochure](#).

Conversation Starters

"How might your conflicts of interest affect me, and how will you address them?"

More detailed information about our conflicts of interest may be found in our [Form ADV Part 2A Firm Brochure](#).

How do your financial professionals make money?

Our financial professionals are compensated based on the amount of user fees paid through the Website, and we are indirectly through the referral and/or revenue sharing arrangements with Independent Partners as described above. Our financial professionals do not earn commissions.

Do you or your financial professionals have a legal or disciplinary history?

No. You may visit [Investor.gov/CRS](https://www.investor.gov/CRS) for a free and simple search tool to research us and our financial professionals.

Conversation Starters

"As a financial professional, do you have any disciplinary history? For what type of conduct?"

Additional Information

You can find additional and up-to-date information about our investment advisory services and request a copy of the Client Relationship Summary by visiting www.advicebyathena.com, emailing contact@advicebyathena.com, or calling 800-850-7753.

Conversation Starters

"Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?"

Exhibit – Summary of Material Changes

The firm name has changed to Athena Advisory Inc., from Athena Advisory RIA, LLC.