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Form ADV Part 2A
Unstoppable Asset
Client Brochure

November 6, 2026

Item 1 Cover Page

This brochure provides information about the qualifications and business practices of Unstoppable Asset LLC. If you have any questions about the contents of this brochure, please contact us at (860) 368-0224 and/or compliance@unstoppableasset.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 Unstoppable Asset LLC is also available on the SEC's website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number: our CRD number is 338072.

Item 2 Material Changes

This brochure has been amended as part of an other-than-annual amendment filed in November 2026. The following material changes have been made since our last brochure:

Registration. We are now registered with the SEC as an internet adviser under Rule 203A-2(e), and we give investment advice to all clients only through our interactive website.

Models (Item 4). For teenage clients, our models are now 100/0, 95/5 and 90/10 (stocks/bonds), in place of five models from 90/10 to 98/2.

Fees (Item 5). Our fee is no longer calculated daily; it is calculated and deducted quarterly in arrears.

Correction (Item 10). Hill Fort Capital Partners Ltd reports to the SEC as an Exempt Reporting Adviser; it is not registered with the SEC.

Item 3 Table of Contents

Form ADV Part 2A	1
Item 1 Cover Page	1
Item 2 Material Changes	2
Item 3 Table of Contents	3
Item 4 Advisory Business	4
Item 5 Fees and Compensation	7
Item 6 Performance-Based Fees and Side-by-Side Management	8
Item 7 Types of Clients	8
Item 8 Methods of Analysis, Investment Strategies and Risk of Loss	8
Item 9 Disciplinary Information	10
Item 10 Other Financial Industry Activities and Affiliations	10
Item 11 Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	11
Item 12 Brokerage Practices	11
Item 13 Review of Accounts	12
Item 14 Client Referrals and Other Compensation	13
Item 15 Custody	13
Item 16 Investment Discretion	13
Item 17 Voting Client Securities	13
Item 18 Financial Information	13
Form ADV Part 2B - Brochure Supplement	14
Item 2 Educational Background and Business Experience	15
Item 3 Disciplinary Information	15
Item 4 Other Business Activities	15
Item 5 Additional Compensation	16
Item 6 Supervision	16

Item 4 Advisory Business

A. General Description of the Company

Unstoppable Asset LLC ("Unstoppable Asset," "the firm," or "we") is an investment adviser registered with the Securities and Exchange Commission ("SEC") pursuant to the Investment Advisers Act of 1940, as amended. Registration does not imply a certain level of skill or training.

Unstoppable Asset was founded in 2023 with the mission to improve financial literacy and provide accessible investment opportunities. We specialize in low-cost, diversified portfolios designed for long-term investment growth, particularly suitable for accounts like Roth IRAs with very long time horizons. While we focus on serving teenagers and young adults, we provide investment advisory services to clients of all ages.

Principal Owner: Amitabh Godha

B. Summary of Investment Advisory Services

We provide automated investment management services exclusively through our digital platform. Our primary focus is Roth IRA accounts for teenagers and young adults, though our services are available to clients of all ages seeking long-term, diversified portfolio management.

The Problem We Solve

While approximately one-third of teenagers have earned income that makes them eligible for Roth IRAs, very few actually open and properly invest these accounts. Common outcomes include: accounts never opened due to uncertainty about investment choices, funds sitting uninvested in cash, or speculative investments in individual stocks. We address this by providing professional portfolio management designed specifically for long-term growth horizons.

Custodial Roth IRAs for Minors

For clients under age 18, we establish custodial Roth IRA accounts where the minor is the beneficiary and a parent or legal guardian serves as custodian until the minor reaches the age of majority in their state of residence.

Investment Management Process:

Our investment management process begins with understanding each client's financial goals and risk tolerance through comprehensive questionnaires. We then

determine the optimal asset allocation strategy using low-cost, diversified exchange-traded funds (ETFs) focused on long-term growth.

The onboarding process includes:

1. Account Setup: Clients create accounts through our digital platform, providing required personal information and completing required identity verification procedures.
2. Risk Assessment: Each client completes our risk tolerance questionnaire, which evaluates:
   - Investment time horizon (up to 45-50 years until retirement for younger clients)
   - Risk capacity based on age and long-term savings goals
   - Subjective risk tolerance through scenario-based questions
   - Family financial circumstances relevant to minor's investment profile
3. Portfolio Construction: Based on the risk assessment, our algorithm assigns clients to one of our model portfolio allocations. For teenage clients with investment horizons of 45-50 years, these allocations are:
   - 100% equity/0% bonds
   - 95% equity/5% bonds
   - 90% equity/10% bonds
4. Automatic Investment: All contributions are automatically invested according to the client's target allocation to reach full investment of contributed amounts.
5. Rebalancing: Portfolios are automatically rebalanced annually or when allocations drift more than 5% from target weightings.

Gift Contribution Platform

We offer a contribution platform enabling family members and friends to contribute directly to a client's Roth IRA through personalized contribution pages. All contributions are subject to annual IRS Roth IRA contribution limits and eligibility rules. Clients should consult with tax professionals for specific guidance.

Investment Philosophy and Strategy

Our investment philosophy centers on diversified, low-cost investing with a long-term perspective. We emphasize low portfolio turnover and utilize investment options meeting the following criteria:

- Expense ratios below 0.10% per annum
- Broad market diversification
- High liquidity and trading volume (for ETFs)
- Track record of at least 3 years

- Assets under management exceeding $1 billion

ETF and Fund Selection Criteria:

- Domestic Equity: Broad-market index ETFs/Funds tracking S&P 500, total stock market, or similar benchmarks
- International Equity: Broad-market index ETFs/Funds tracking international (ex-US) benchmarks
- Fixed Income: Aggregate bond index ETFs/Funds including Treasury and corporate securities

Our investment advice is limited to portfolios composed of ETFs/Funds meeting these criteria.

Portfolio Monitoring and Maintenance

We continuously monitor client portfolios to ensure they remain aligned with target allocations. Our ongoing monitoring includes:

- Adherence to target allocations
- Need for rebalancing when drift exceeds thresholds
- Investment of new contributions
- Changes in underlying ETF/Fund characteristics

Technology Platform

Our proprietary technology platform provides:

- Mobile-responsive web application
- Real-time portfolio and performance monitoring
- Educational content delivery
- Gift contribution platform functionality
- Automated investment processing
- Account statements provided through custodian

C. Tailored Services and Investment Restrictions

We use a standardized approach to portfolio management based on client risk assessments. Our algorithm assigns clients to age-appropriate model portfolios based on their investment time horizon.

Client-Directed Modifications:

Through our platform, clients may adjust their portfolio allocation by selecting from available model portfolios appropriate for their age and time horizon. The platform displays only those model portfolios suitable for the client's circumstances, along with each portfolio's characteristics and historical volatility. For minor accounts, custodial parents or legal guardians make these selections on behalf of the minor.

Clients may update their risk tolerance assessment at any time through the platform, which may result in a recommendation to change to a different model portfolio within their age-appropriate options. Any allocation change is implemented automatically by the system.

Clients may not exclude individual securities or impose investment restrictions within a selected model portfolio.

D. Wrap Fee Programs

We do not participate in wrap fee programs.

E. Assets Under Management

As of November 6, 2026, we manage approximately:

Discretionary: $0

Non-Discretionary: $0

Total: $0

Item 5 Fees and Compensation

A. Fee Schedule

We charge an annual advisory fee of 0.15% of assets under management. Fees are calculated based on your account balance and deducted quarterly in arrears. Our fee is the same for all clients and is not negotiable.

Our advisory fee covers portfolio management, account administration, and educational resources. We do not charge account setup fees, minimum fees, or fees for our gift contribution platform.

B. Fee Payment Method

Fees are deducted directly from your account held at Charles Schwab. You will receive quarterly statements from Schwab showing fee calculations, deductions, and account performance.

C. Other Fees and Costs

In addition to our advisory fee, you will pay:

Fund Expenses: ETFs and mutual funds in your account charge expense ratios, typically 0.03% to 0.10% annually. These are charged by the fund companies and deducted from fund returns.

Custodian Fees: Charles Schwab may charge fees for services such as wire transfers and returned checks. Schwab does not charge account maintenance fees or commissions for ETF trades.

Brokerage Costs: For information about how we select brokers and our brokerage practices, see Item 12 below.

D. Termination and Refunds

Because our fees are charged quarterly in arrears, you only pay for services provided through your termination date. You may terminate our services at any time by providing written notice. If fees have been deducted for a quarter that is incomplete at termination, we will refund the unused portion on a pro-rata basis within 30 days.

Item 6 Performance-Based Fees and Side-by-Side Management

We do not charge performance-based fees. You pay only the annual advisory fee described in Item 5.

Item 7 Types of Clients

We provide investment advisory services to individuals seeking low-cost, diversified, long-term investment strategies. Our clients include:

- Teenagers with custodial Roth IRA accounts
- Young adults with individual Roth IRA accounts
- Custodial brokerage accounts for families saving for milestones such as education or life events
- Individuals of any age seeking simple, automated investment management

We do not require a minimum account size, making our services accessible to investors at all stages of their financial journey.

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

A. Methods of Analysis

We use fundamental analysis to select ETFs and mutual funds for client portfolios. We evaluate expense ratios, benchmarks, tracking error, liquidity, asset base, and fund management quality using both proprietary research and third-party data sources.

B. Investment Strategies

All investments carry risk of loss. You should be prepared to lose some or all of your invested capital.

We use the following investment strategies:

Passive Index Investing: We use low-cost index ETFs and mutual funds to provide diversified exposure to U.S. and international equity and fixed-income markets.

Risks: Market values fluctuate and will decline during downturns. ETFs may not perfectly track their indices. In extreme market conditions, trading may be suspended. Bond values decline when interest rates rise. Fixed income investments may lose purchasing power during inflation.

Strategic Asset Allocation: We determine your portfolio allocation through our risk assessment algorithm. Your allocation remains consistent with long-term targets, with adjustments only for rebalancing.

Risks: Our algorithm may not accurately predict the best allocation for your individual circumstances. Platform outages may temporarily prevent account access. Cybersecurity threats pose risks to your personal and financial information despite our security measures.

Dollar-Cost Averaging: We invest your contributions immediately upon receipt, which implements dollar-cost averaging to reduce timing risk.

Risks: This strategy does not protect against losses in declining markets, but your long-term investment horizon provides time for recovery.

C. Primary Security Type Risks

We invest primarily in ETFs and mutual funds. These securities carry the following material risks:

Fund-Specific Risks: Fund providers may close or merge funds, requiring portfolio adjustments. ETFs may trade at premiums or discounts to net asset value.

Interest Rate and Inflation Risk: Bond fund values decline when interest rates rise. Fixed income investments may lose purchasing power during inflationary periods.

Investment Vehicle Limitation: We invest only through ETFs and mutual funds rather than individual securities. This means you cannot customize your portfolio to include or exclude specific companies.

Additional Risks: Regulatory changes may affect retirement account benefits. For custodial accounts, the custodian controls the account until the minor reaches majority age, and Roth IRA withdrawal rules may limit early access to funds.

Item 9 Disciplinary Information

Neither Unstoppable Asset LLC nor its management has been involved in any legal or disciplinary events that would be material to a client's evaluation of our advisory business or the integrity of our management.

Item 10 Other Financial Industry Activities and Affiliations

Mr. Amitabh Godha, our principal, has the following outside financial industry affiliations:

(1) Hill Fort Capital Partners Ltd ("HFCP").

Mr. Godha serves as a non-executive Director of HFCP, an investment adviser incorporated in Mauritius that reports to the SEC as an Exempt Reporting Adviser (CRD No. 304499; SEC File No. 802-116879). HFCP is also regulated by the Mauritius Financial Services Commission and the Securities and Exchange Board of India. HFCP serves as the general partner and investment adviser to the Hill Fort India Fund LP and Hill Fort Feeder Fund TE LP, private funds focused on Indian equity investments for institutional investors.

Mr. Godha holds no equity, partnership, membership, or other ownership interest in HFCP, the Hill Fort funds, the general partner, or any affiliated entity. He serves on a four-member board and receives annual director fees of approximately USD 15,000. Mr. Godha is not an officer of HFCP, does not direct the day-to-day operations of HFCP, and does not exercise investment discretion over the Hill Fort funds.

HFCP and Unstoppable Asset operate in distinct markets and serve distinct client populations. HFCP advises pooled private funds invested in Indian equities for institutional investors. Unstoppable Asset advises individual retail clients through automated, broad-market portfolios composed of low-cost ETFs and mutual funds. The two firms have no client overlap, no operational integration, no shared brokerage or custodial relationships, and no information or client-data sharing. Unstoppable Asset does not refer clients to HFCP and does not receive referrals from HFCP.

(2) Vistaar Capital LLC ("Vistaar").

Mr. Godha is the founder and managing partner of Vistaar, a family investment vehicle wholly owned by Mr. Godha and his spouse that invests the family's personal capital in real estate and private equity opportunities. Vistaar has no outside investors. Vistaar is not registered as an investment adviser and does not, for compensation, engage in the business of advising others as to the value of securities or as to the advisability of investing in, purchasing, or selling securities.

Vistaar and Unstoppable Asset operate in distinct markets and serve distinct client populations. Unstoppable Asset's clients invest in publicly traded ETFs and mutual funds; Vistaar invests in physical real estate and private companies for the family's own account. There is no overlap of investment universes, no opportunity for cross-trades, and no information or client-data sharing between the two firms. We do not solicit Unstoppable Asset clients for Vistaar investments. If any conflict of interest arises, we will notify clients promptly.

We have no other financial industry affiliations.

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

A. Code of Ethics

We have adopted a Code of Ethics that sets standards of conduct for our personnel and addresses conflicts of interest. The Code covers fiduciary duty, personal trading restrictions, confidentiality, and outside business activities. We will provide a copy of our Code of Ethics to any client or prospective client upon request.

B. Participation in Client Transactions

We do not buy securities from or sell securities to clients. We do not have any ownership interest in the ETFs or mutual funds we recommend to clients.

C. Personal Trading

Our personnel may invest in the same ETFs and mutual funds we recommend to clients. This creates a conflict because we could potentially benefit from market movements in these securities. We address this conflict by requiring our only access person, our Chief Compliance Officer, to report his personal securities holdings and transactions quarterly. We prohibit front-running—trading ahead of client transactions to benefit from anticipated market movements.

Item 12 Brokerage Practices

A. Broker-Dealer Selection

We use Charles Schwab for custody and trade execution. We selected Schwab based on:

- Competitive execution quality and pricing
- Strong technology for small accounts
- Regulatory compliance and financial stability
- Cost-effectiveness for our clients

We review execution quality quarterly by checking transaction costs, speed, and accuracy against market standards.

Research and Soft Dollar Benefits: As part of our custodial relationship with Charles Schwab, we receive access to research at no separate charge to us or our clients.

Brokerage for Client Referrals: We do not consider client referrals when selecting brokers.

Directed Brokerage: You cannot direct us to use a specific broker. All client accounts use Schwab.

B. Order Aggregation

We combine client orders when possible to achieve better execution and lower costs. Contributions are invested within one business day, and portfolios are rebalanced annually (or when allocation drifts more than 5% from target).

Item 13 Review of Accounts

A. Periodic Reviews

Our Investment Adviser Representative reviews client accounts weekly to ensure they remain aligned with their assigned model portfolio.

B. Non-Periodic Reviews

Additional reviews may occur due to:

- Significant market events
- Client retaking the Risk Tolerance Questionnaire
- Material changes to client circumstances

C. Client Reports

Clients receive quarterly account statements directly from Schwab, our independent custodian. These statements are written and include account holdings, transactions, and performance.

We do not provide separate written reports. Clients can view their account information anytime through their Schwab account at schwab.com.

Item 14 Client Referrals and Other Compensation

We do not compensate third parties for client referrals, and we do not receive compensation or economic benefits from anyone for providing investment advice to clients.

Item 15 Custody

We have custody of client funds because we deduct our advisory fee directly from client accounts. Your assets are held by Charles Schwab, our independent qualified custodian. Schwab will send you account statements at least quarterly. Please carefully review these statements.

Item 16 Investment Discretion

Clients grant us discretionary authority by signing our advisory agreement. This allows us to determine which securities to buy and sell, the amounts, and timing without consulting you before each transaction.

Model Portfolio Selection: You may select from age-appropriate model portfolios through our platform as described in Item 4. Changing your model portfolio will trigger automatic reallocation of your account.

Limitations: You cannot exclude individual securities or impose investment restrictions within your selected model portfolio. Once a model is selected, we have full discretion over all investment decisions within that model.

Item 17 Voting Client Securities

We do not vote proxies on behalf of clients. You will receive proxy materials directly from Schwab or the transfer agent. We do not provide advice or recommendations regarding proxy voting. The voting decision is entirely yours.

Item 18 Financial Information

We do not require or solicit prepayment of more than $1,200 in fees per client, six months or more in advance. We have no financial condition that is reasonably likely to impair our ability to meet commitments to clients. We have never been subject to a bankruptcy proceeding.