



*Premium Income. Equity Appreciation. Outstanding Returns.*

## Accelar, Inc. DBA XoomFi Advisors

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This brochure provides information about the qualifications and business practices of XoomFi Advisors. If you have any questions about the contents of this brochure, please contact us using the phone number or emails noted above. 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 XoomFi Advisors is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Registration does not imply a certain level of skill or training, and no inference to the contrary should be made.



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## Item 2: Material Changes

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This brochure is materially different from the brochure filed on December 2, 2022. It has been re-written and re-designed to align with the specific requirements of the Advisors Act.

## Item 3: Table of Contents

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## Item 4: Advisory Business

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### Firm Description

Incorporated in November 2006, Accelar, Inc. is a registered investment advisor, doing business as XoomFi Advisors (“XoomFi” or the “Firm”), offering investment advisor services, as further described below, through the internet since June 2021.

### Principal Owners

Kumar Shah is the principal owner of XoomFi.

### Types of Advisory Services

XoomFi is an internet-based advisor which uses an algorithm created to manage client accounts based on their individual financial situation and goals. Clients provide information about themselves and their investment objectives exclusively through XoomFi’s interactive website.

We rely on integrated, cloud-based portal for the account opening process. Through the interactive website, each client completes a client profile and answers a risk tolerance questionnaire. Based on the information provided in the risk tolerance questionnaire, the algorithm generates an allocation of the client’s funds in one or more of the XoomFi investment models.

Our algorithm creates an investment profile for each client based on a variety of factors - capital investment amount, stocks and options investment experience, expectation of return on their investment, risk / reward profile, among others. This profile is based on the questionnaire each client fills out online.

Investment allocation to one or more than 1 investment model is typically determined by the amount you invest:

- Up to \$25,000: 1 portfolio
- \$25,001 to \$50,000: 2 portfolios
- \$50,001+: 3 portfolios

Our algorithm will select one or more of the following investment models – Balanced Income & Growth, Turbo Income & Growth and / or Ultra Income & Growth - based on your investment profile and invested amount. While there is no direct, set, or permanent correlation between the market cap of the equities in your account and other selection criteria and associated risks and rewards, in our assessment, risks and rewards will tend to be lower for the Balanced Income & Growth portfolio compared to Turbo



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Income & Growth, which, in turn, will be lower than the risks and rewards associated with the Ultra Income & Growth portfolio.

Clients will electronically enter into an advisory agreement with XoomFi and open a brokerage account with Interactive Brokers, an independently registered broker dealer acting as the custodian of client accounts. XoomFi will maintain discretion over client accounts. Each client account is managed as a Separately Managed Account (SMA) by XoomFi with no co-mingling of funds between the SMA's.

The algorithm uses the following assumptions in recommending investment models:

- A lower risk level is preferred over a higher risk level for the same level of return
- An individual security impacts the risk and return profile of an entire portfolio, therefore diversified portfolios can outperform while reducing risk and volatility
- Assets in a portfolio that have a negative correlation, could realize stronger returns rather than exclusively holding one type of asset within a portfolio

The algorithm may also have limitations that include:

- Minimalizing risk may limit returns
- Purchase of underperforming equities and sale of better performing equities to achieve targets which can create capital gain tax liabilities
- The lack of updated information on a timely basis by a client

Risks inherent in the use of an algorithm may include:

- The inability to react to significant events on an intraday basis
- The inability to recognize prolonged changes in market conditions
- Technology failures
- Systemic risk may be amplified

Conditions that might cause XoomFi to override the algorithm include:

- Significant events that move the market or an individual asset on an intraday basis
- Prolonged changes in market conditions
- Technology failures

Clients should review and update their personal information at least yearly and whenever a significant life event occurs that changes one or more of the original inputs.

### **Limited Types of Investments**

Our investment models only invest in stocks and options.



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## Tailored Relationships

Clients will not be allowed to place restrictions on their accounts.

## Client Assets

As of July 14, 2023, XoomFi had approximately \$44,000 in discretionary assets under management.

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# Item 5: Fees and Compensation

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## Description

XoomFi is compensated for its services by charging and receiving a management fee of 0.25% of assets under management each quarter.

XoomFi's quarterly performance fee is debited directly from the client accounts at the beginning of each quarter for the previous quarter.

**We will cover the trading costs charged by Interactive Brokers to your account. You will be responsible for any additional fees including custodial fees charged by Interactive Brokers.**

## Other Fees

Clients should recognize that all fees paid to XoomFi are separate from the fees and expenses charged by ETFs and mutual funds, if held within your portfolio. These fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee.

XoomFi will cover the brokerage commissions charged by Interactive Brokers. Clients pay all other costs such as transfer taxes, trade away fees, minimum activity fees, allocation fees and other fees charged by the broker for executing security trades, which are separate from the fees charged by the Firm. Please see the section entitled "Item 12: Brokerage Practices" for more information on how XoomFi selects its broker-dealers.

## Termination of Services

You may terminate services at any time, for any reason or no reason, by written notification by email. Fees will be pro-rated to the date of termination and due immediately.

Upon termination, the Agreement you have signed with XoomFi shall also terminate. Upon termination, we will liquidate your Account's holdings; collect the Management Fee due for the current quarter;



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distribute the remaining funds to you; and then close the Custodian Account. We will, at such point, have no continuing obligation to advise or act with regards to your Account assets.

### **Additional Compensation**

Neither XoomFi nor any of its employees receive compensation for recommending any particular investment strategies, including the sale of securities or other investment products.

## **Item 6: Performance-Based Fees & Side-by-Side Management**

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XoomFi does not charge Performance based fees.

## **Item 7: Types of Clients**

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### **Description**

As of the date of this brochure, all XoomFi's clients are individuals. However, the services offered through the interactive website are suitable for both individuals and institutions.

### **Account Minimums**

XoomFi requires a minimum of \$25,000 for retail investors to invest and \$100,00 million for institutional investors.

## **Item 8: Methods of Analysis, Investment Strategies and Risk of Loss**

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### **Methods of Analysis**

There is no specific method of analysis employed for the investment models offered by XoomFi. Selection of the equities for each model is based on a variety of criteria, including:

- Market capitalization
- Market sector dynamics



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- Short-term changes in the direction and price movement of the equity
  - Volatility - current vs. historical - of the underlying equity
  - Premium income potential of the underlying equity

For each equity position, the algorithm determines a short to medium term target price for the equity and covered call. The algorithm tracks the directional and price movements for each of the equity positions and associated options. It also monitors a variety of other data - price change relative to the trade prices for the equity and option, # of days to expiration for the options, velocity and acceleration or deceleration of the price changes, upside potential and downside risk during the trade window, among others. The algorithm adjusts each of the equity positions; makes decisions to enter or exit specific positions; or roll to a different price or expiration for the options based on the data it monitors and tracks for each equity position.

XoomFi trading system is based on four fundamental and foundational principles:

- a) Proprietary research and screening algorithm to find securities which meet specific criteria well suited for each investment model;
- b) Adjustments in equity positions in response to market conditions, and directional & price changes in the underlying equity positions;
- c) Periodic rebalancing of the portfolio using algorithmic triggers to add or remove equities from investment portfolios; and
- d) Building and growing the equity base by adding certain securities / equities to the long-term equity portfolio.

XoomFi trading algorithm monitors and tracks a variety of market data and manages each of the portfolios and each equity position from the trade date to the next weekly or monthly options expiration date.

We anticipate being in each equity position for a time ranging from 15 to 45 days. Upon exiting each of these equity positions, typically on or around monthly options expiration dates, the XoomFi trading algorithm is designed to re-invest the funds except when market conditions represent extreme turbulence and volatility. Under normal market conditions, we anticipate reinvesting the funds in each portfolio 10 to 12 times per year.

## Investment Strategies

The XoomFi trading system uses our proprietary algorithm to identify and select equities for the following investment models:

- Balanced Income & Growth



- Turbo Income & Growth
- Ultra Income & Growth

XoomFi Investment Models are built around Buy-Write Calls or Covered Calls which involve buying a stock or a basket of stocks and covered call options that correspond to the stock or basket of stocks, or stocks and / or options on a stand-alone basis

The type of securities is limited to stocks and options.

### **Risk of Loss**

Although XoomFi makes every effort to preserve each client's capital and achieve real growth of wealth, **investing in markets involves risk of loss that each client should be prepared to bear.** All investment strategies have certain risks that are borne by the investor. While the XoomFi investment approach constantly keeps the risk of loss in making investment decisions, there are no guarantees to avoid the risk of loss under all market conditions.

While not an exhaustive list, below are some of the risks clients should be aware of when investing their assets with XoomFi:

**Software Risk:** Clients should understand that the algorithm is entirely dependent on receiving accurate information from clients. If clients provide inaccurate information with regard to a client's assets, goals, risk aversion and time horizon, or if a client fails to update promptly their information when it changes, it could materially impact the quality and applicability of the algorithm's recommendations. XoomFi has the ultimate discretion and the capability to override the algorithm Model recommendations and will do so when in the client's best interest. Clients may update their information on the Firm's website. Information should be updated whenever there are changes to a client's assets, goals, risk aversion and time horizon.

**Equity Security Risk:** Clients should be aware that stock values fluctuate. Generally, their worth is based directly on the performance of the specific company. Individual stock values will also be impacted by the general movement of the stock market. Clients should be aware that when investing in stocks, the risk of significant loss exists.

**Option Investing Risk:** In general, a derivative contract (including options) typically involves leverage, i.e., it provides exposure to a potential gain or loss from a change in the level of the market price of a security, currency, or commodity (or a basket or index) in a notional amount that exceeds the amount of cash or assets required to establish or maintain the derivative contract. Consequently, an adverse change in the relevant price level can result in a loss of capital that is more exaggerated than would have resulted from an investment that did not involve the use of leverage inherent in the derivative contract.





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## Item 9: Disciplinary Information

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Neither XoomFi nor any employees have disciplinary events to disclose.

## Item 10: Other Financial Industry Activities and Affiliations

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XoomFi nor any supervised persons of XoomFi is affiliated with any entity, registered as a broker-dealer, a futures commission merchant, commodity pool operator, or a commodity trading adviser.

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

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### Code of Ethics

XoomFi seeks to avoid conflicts of interest that could arise if its employees engage in personal investing for their own accounts. XoomFi has adopted a Code of Ethics which defines the standard of conduct that employees are required to maintain. The Code of Ethics includes provisions relating to personal securities trading and reporting procedures, conflicts of interest, and insider trading among other things. All XoomFi personnel must acknowledge the terms of the Code of Ethics upon hire, and when amendments are implemented.

Clients or prospective clients may contact XoomFi to request a copy of the firm's Code of Ethics.

### Invest in Same Securities Recommended to Clients

XoomFi employees are permitted to buy and sell securities for their own personal investment accounts provided they comply with the Code of Ethics' procedures and reporting requirements which are designed to prevent any potential conflict of interest with client transactions. XoomFi believes that these procedures are adequate to prevent any intentional or inadvertent conflict of interest.



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## Personal Trading Policies

XoomFi has a policy in place to monitor the personal securities transactions and securities holdings of its employees and their immediate family members. XoomFi policy requires that each employee and their immediate family members provide the Chief Compliance Officer with a written report of his or her current securities holdings within ten (10) days after becoming an employee and annually thereafter. In addition, each employee and their immediate family member must provide to the Chief Compliance Officer details of the transactions on a quarterly basis.

# Item 12: Brokerage Practices

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## Selecting Brokerage Firms

XoomFi places all trades with Interactive Brokers when effecting securities transactions for the client's managed by XoomFi. Clients must open a custodial account with Interactive Brokers to utilize the investment advisory services offered by our Firm. The Firm believes Interactive Brokers provides it with high-quality executions, low fees, and a high level of financial stability. XoomFi is not affiliated and does not receive any compensation or referrals in exchange for utilizing Interactive Brokers. Clients will not be able to select another broker-dealer. As a result, XoomFi will not be able to negotiate commissions paid to Interactive Brokers, and clients may pay smaller fees to another broker-dealer for similar services.

## Research and Soft Dollars

XoomFi does not have soft dollar arrangements.

Interactive Brokers makes available to XoomFi other products and services that benefit XoomFi but may not necessarily benefit its clients' accounts. Some of these other products and services assist XoomFi in managing and administering clients' accounts. These services are listed and described on Interactive Brokers website and may include a system used to manage client relationships and consulting. These free services may change from time to time without notice to XoomFi. XoomFi does not receive a monetary benefit for use of these services.

## Brokerage Referrals

XoomFi does not receive referrals from Interactive Brokers.

## Directed Brokerage

Clients cannot direct their brokerage to a broker other than Interactive Brokers.



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## Order Aggregation

In those instances where XoomFi believes it is in the best interests of a client to do so, we will “block” (combine) the client’s order with those of other clients having similar orders for the purpose of obtaining an advantageous average price for all accounts participating in the block. Any decision not to block a transaction with those of other clients is based upon XoomFi deciding that it is more beneficial to time transactions for the benefit of each client’s account individually.

# Item 13: Review of Accounts

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## Periodic Reviews

Clients will have real-time access to their portfolio within the Firm’s interactive website. Review of a client account is triggered upon a client modifying their investment objectives through the Firm’s interactive website.

You may use the interactive website to review and/or update your account information and risk profile. We will reconfirm this information with you on an annual basis. The XoomFi team will periodically review accounts, individually and at the aggregate level, to ensure that the investment allocations are in alignment with their targets, that the risk tolerance responses are still valid.

## Regular Reports

The clients have the ability to generate real-time as well as historical reports of their investments in XoomFi models in the XoomFi Dashboard.

# Item 14: Client Referrals and Other Compensation

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XoomFi does not currently have any relationships with third parties to refer clients. However, XoomFi may do so in the future, in which case this brochure will be revised and all clients referred will be made aware of the conflicts associated.



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## Item 15: Custody

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XoomFi does not maintain physical custody of client accounts, however in its capacity to instruct the custodian to withdraw its fees directly from clients has been deemed to have indirect custody. To mitigate this, XoomFi ensures all client assets are held by an independent qualified custodian that is sending statements directly to you.

## Item 16: Investment Discretion

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XoomFi has sole discretionary authority with respect to the investment decisions made on behalf of clients pursuant to the terms of the Investment Advisory Agreement.

## Item 17: Voting Client Securities

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By opening an advisory account and entering into the Investment Agreement, you authorize us to vote proxies for the securities held in your Account, although you may retain proxy voting authority by instructing us and your Account's custodian in writing.

If we are not voting proxies for your accounts, you will receive your proxy and reporting information directly from the custodian and you cannot contact XoomFi for questions on your proxy votes.

If we are voting your proxies, we will vote them in accordance with our established policies and procedures, which were created to reasonably ensure that votes cast are in your economic interest. A copy of our proxy voting policies is available upon request.

Notwithstanding the foregoing, if we identify any material conflict of interest between ourselves and you, we will determine whether it is appropriate to inform you, to give you an opportunity to vote the relevant proxies or to address the voting issue through other objective means such as voting in a manner consistent with a predetermined voting policy or an independent third-party recommendation.

We will maintain a record of our proxy voting activities, including the resolution of any proxy voting conflict of interest. If you hold similar securities as those in your Account elsewhere, you should note that it is possible that a given proxy vote for your Account could differ from the other vote for the securities



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held elsewhere. You can contact us if you have questions regarding voting proxies, in general, or wish to obtain information concerning how securities in your Account were voted.

The Investment Agreement does not authorize us to act on your behalf in any legal proceedings or other corporate actions, including class actions or bankruptcies, involving securities held in your Account.

## Item 18: Financial Information

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XoomFi has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients and has not been the subject of a bankruptcy proceeding. Further, we do not accept pre-payment of fees of more than \$1,200 and six months in advance and therefore are not obligated to provide a balance sheet within this brochure.