Investment Advisory Disclosures Form ADV Part 2

Gray Matrix Inc DBA Kuber Investments
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Item 1: Cover Page

This Brochure provides information about the qualifications and business practices of Gray Matrix Inc DBA Kuber Investments(CRD# 297229). If you have any questions about the contents of this Brochure, please contact us at 949-285-0006. 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.

Kuber Investments is DBA name and is a registered investment adviser located in Irvine, California. Registration of an investment adviser does not imply any level of skill or training. The oral and written communications of an adviser provide you with information about which you determine to hire or retain an adviser.

Item 2: Material Changes

To Request Copies of our Brochure

Currently, this Brochure may be requested by contacting Mahesh Jain at 949-285-0006 or mahesh@kuberinvestments.com. This Brochure is also available on our web site www.kuberinvestments.com free of charge.

Item 3: Table of Contents

Item 4: Advisory Business

Gray Matrix Inc DBA Kuber Investments ("KI" or "We") is a Irvine, California-based investment advisory firm, founded on June 01, 2018. KI specializes in providing discretionary portfolio management services to individuals and/or small businesses for an asset-based fee.

Such services are provided in accordance with each client's investment objectives & risk tolerance. We currently offer Growth, Balanced, and Income investment objectives. For more details, *see "Item 8"* for methods of analysis, Investment strategies & risk of loss.

Under our portfolio management agreement, we generally hold a limited power of attorney to act on a discretionary basis with client securities subject to any restrictions the client may place on individual securities or types of securities. Firm does not have a discretion over the selection of a Broker-Dealer but recommends Interactive Brokers ("IBKR") as a preferred Broker-Dealer. Interactive Brokers is a member FINRA/SIPC ("Interactive Brokers"), an unaffiliated SEC-registered broker-dealer and FINRA member. Client assets are deposited at the client's designated broker-dealer. No assets are held by KI, as required by applicable law.

Wrap fee: KI does not participate in any wrap fee program.

AUM: KI has $2.8M discretionary assets under management as of Dec 31, 2020

Item 5: Fees and Compensation

The standard annual investment management fee is as follows:

Market Value of Account Annual Rate

$100,000 to $250,000	2.0%
$250,001 to $500,000	1.75%
$500.000 to $750,000	1.5%
$750,001 to $1,000,000	1.25%
$1,000,000+	1.00%

KI's asset-based fee is payable in arrears at the end of each calendar year. Clients are provided with an invoices that can be paid on receipt. If KI provides service for less than one full calendar year, it will pro-rate its fee based on the number of days of the year KI provided its services. For ex. If they invested $1M on July 1st, the management fee will be calculated as "1,000,000 x 0.01 x 183/365 = $5010". Similarly, if the funds are deposited on July 1st, and withdrawn on July 30, the AUM fee will be "1,000,000 x 0.01 x 31/365 = $850". Either KI or the client can terminate the client's investment management agreement upon written notice at any time, and if a client terminates an agreement within five (5) business days after signing the agreement, KI charges no fees for the period between signing and terminating.

KI may deem appropriate to hold ETFs (Exchange Traded Fund) in client accounts to provide greater diversification or if KI judges the client's portfolio too small for a diversified portfolio of individual stocks. ETFs are baskets of stocks and involve the usual transaction fee like Stocks but they may represent certain sector or even the overall Market (ex. SPY). Investing in a ETF like SPY provides exposure to the whole Markets in general and elminiates business risk to a certain extent that is inherent with individual stock picking. For more information, please refer to https://www.investopedia.com/terms/e/etf.asp

Clients also pay all brokerage, transaction and custodial expenses that incur as a result of our management of their portfolio. It is important to understand that lower fees for comparable services may be available from other sources. Also, KI and any of its supervised persons do not accept compensation for the sale of securities or other investment products. Please see Item 12 for more information on our brokerage practices.

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

KI does not charge performance-based fees because we believe it encourages advisers to take excessive risk in order to boost fees.

Item 7: Types of Clients

As discussed above in Item 4, KI provides investment services to individuals and small businesses. Advisory portfolio management services provided to clients are fully discretionary, subject to client restrictions as to excluded securities. We generally require new clients to have a minimum investment portfolio of $100K to open an account. We, in our discretion, reserve the right to waive this minimum. In addition, we require all clients make representations concerning their experience in engaging investment advisers and the risks associated in such engagements, including the risk that the client's account could suffer substantial diminution in value. KI recommends IBKR (a Broker-Dealer) as a preferred Custodian to hold its Client's assets but is also willing to work with Client's choice of Custodian. Please see Item 12 for more information about IBKR.

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

Method of Analysis: KI uses both internal and external sources to conduct financial research on securities.

Internal financial research involves using fundamental analytical methods to determine the underlying value of a company's stock, as well as analyzing a number of quantitative measures, such as valuation (*e.g.,* price-earnings ratio, book value, price per revenue), growth performance (earnings per share, revenues and free cash flow), price/earnings to growth ratio, return on capital, and various debt metrics, to identify potentially undervalued stocks and/or stocks with good growth potential.

Internal research on screening includes reading reports published by independent organizations, reading corporate sustainability reports, and contacting companies, stakeholders and independent non-governmental and governmental organizations directly.

External research on financial issues is obtained using reports and on-line information provided by IBKR Institutional, Value Line, Morningstar, and Standard & Poor's, and a subscription to Barrons's and Investor Business Daily.

Investment Strategies: There are two types of investments that make up the majority of our clients' portfolio assets: equity securities (stocks) and fixed income securities (bonds). Our equity securities primarily include individual stocks of large cap domestic companies, and we may also include mid-cap stocks and American Depository Receipts representing interests in foreign stocks ("ADRs") in a portfolio if they meet the client's financial need. We also may include various ETFs (exchange traded funds) to provide greater geographic, industry and market cap diversification.

Fixed income securities in which we invest include investment-grade corporate and municipal bonds, U.S. government and agency securities, convertible securities, preferred stocks, and bond ETFs We generally do not invest in Mutual Funds and prefer Active investing custom tailored to Client's requirement. We also avoid shorting and investing on margin, unless otherwise directed by Clients, who understands the risk involved in the same.

As mentioned in Item 4 and Item 5 above, KI currently offers three investment objectives to fit the risk tolerance of our clients. The Growth investment objective is for clients with a long-term investing horizon who are primarily interested in investing for capital appreciation (a rise in the value of securities). The Balanced investment objective is for more conservative clients with a medium to long-term investment horizon and who are interested in generating primarily income (dividends and interest, respectively, paid on stocks and bonds) along with some capital appreciation. The Income investment objective is for clients who are primarily interested in generating income from investments and preserving principal.

All three investment objectives can be varied to fit the individual client's risk tolerance. The general ranges of target allocations of the three investment objectives are shown below:

Investment Objective	Equities	Fixed Income	Cash Eq*
Growth	60% - 100%	0% - 40%	0% - 15%
Balanced	35% - 55%	35% - 55%	5% - 15%
Income	0% - 30%	60% - 75%	5% - 25%

* Includes money market funds and FDIC insured bank certificates of deposit.

KI maintains a proprietary securities list of approximately 60 to 70 companies, which is updated on a regular basis by our Investment Committee. Securities from our proprietary list are the basis for developing our securities allocations for our clients. We do not mimic a Client portfolio similar to our own, but instead allocate purely based on the Client's risk tolerance. A typical Client portfolio will not hold more than 8 - 10 securities at any given time.

Our screening process identifies Companies with consistent earnings growth, are fairly valued, and have long-term sustainable growth prospects. We generally avoid Cyclical Companies during the contraction phase and invest in Secular growth Companies during expansion phase of the economy pursuant with the Client's requirements and risk tolerance. We also use tactical approach at times to avoid Companies falling out of favour when their Securities fall below the 200DMA (200 Day Moving Average). We understand that algorithms are at work at various tactical levels and take appropriate steps accordingly to either protect the portfolio by purchasing PUTs or get out of that security and wait for the same to climb above the major resistance levels before we purchase it again. We also give due consideration to tax implications and implement various derivative trades to keep the securities but at the same time protect them from volatile markets

Risk of Loss. Investing in securities involves risk of loss that clients should be prepared to bear. The principal risks of our investment strategies and the types of securities in which we invest are:

Management Risk. Our ability to meet the portfolios' investment objectives is directly related to our investment strategies. The value of our client's account may vary with the effectiveness of our research, analysis and asset allocation among portfolio securities. If our investment strategies do not produce the expected results, our client's account assets could even lose value.

General Market Risk. The market value of a security may move up or down, sometimes rapidly and unpredictably. These fluctuations may cause a security to be worth less than the price originally paid for it, or less than it was worth at an earlier time. Market risk may affect a single issuer, industry, or sector of the economy or the market as a whole. U.S. and international markets have experienced significant volatility since 2008. The fixed income markets have experienced substantially lower valuations, reduced liquidity, price volatility, credit downgrades, increased likelihood of default and valuation difficulties. Concerns have spread to domestic and international equity markets. In some cases, the stock prices of individual companies have been negatively impacted even though there may be little or no apparent degradation in the financial conditions or prospects of that company. As a result of this significant volatility, many of the following risks associated with our portfolios may be increased. The U.S.

government has taken numerous steps to alleviate these market conditions. However, there is no assurance that such actions will be successful. Continuing market problems may have adverse effects on our portfolios.

Equity Market Risk. Common stocks are susceptible to general stock market fluctuations and to volatile increases and decreases in value as market confidence and perceptions of their issuers change. These investor perceptions are based on various and unpredictable factors including: expectations regarding government, economic, monetary and fiscal policies; inflation and interest rates; economic expansion or contraction; and global or regional political, economic and banking crises. If you hold common stock of any given issuer, you would generally be exposed to greater risk than if you held preferred stocks and debt obligations of the issuer because common stockholders generally have inferior rights to receive payments from issuers in comparison with the rights of preferred stockholders, bondholders and other creditors of such issuers.

Large-Capitalization Company Risk. Larger, more established companies may be unable to respond quickly to new competitive challenges such as changes in consumer tastes or innovative smaller competitors. Also, large-capitalization ("large cap") companies having market capitalizations of $10 billion or above are sometimes unable to attain the high growth rates of successful, smaller companies, especially during extended periods of economic expansion.

Mid-Capitalization Company Risk. Mid-capitalization ("mid-cap") companies have a market capitalization of between $2 billion and $10 billion. Generally, such companies may have more potential for growth than large-cap companies. Investing in mid-cap companies, however, may involve greater risk than investing in large-cap companies. Mid-cap companies may not have the management experience, financial resources, product diversification and competitive strengths of large-cap companies and therefore their securities may be more volatile than the securities of larger, more established companies, making them less liquid than other securities. Mid-cap company stocks may also be bought and sold less often and in smaller amounts than larger company stocks. Because of this, if we want to sell a large quantity of a mid-cap company's stock, we may have to sell at a lower price than we might prefer, or we may have to sell in smaller than desired quantities over a period of time.

Certain Risks Associated with Cybersecurity. Investment advisers, including KI, must rely in part on digital and network technologies (collectively, “cyber networks”) to conduct businesses. Such cyber networks might in some circumstances be at risk of cyber-attacks that could potentially seek unauthorized access to digital systems for purposes such as misappropriating sensitive information, corrupting data, or causing operational disruption.

Cyber-attacks might potentially be carried out by persons using techniques that could range from efforts to electronically circumvent network security or overwhelm websites to intelligence gathering and social engineering functions aimed at obtaining information necessary to gain access. KI maintains an information technology security policy and certain technical and physical safeguards intended to protect the confidentiality of its internal data. Nevertheless, cyber incidents could potentially occur, and might in some circumstances result in unauthorized access to sensitive information about KI or our clients.

Risk Relating to Investment in Foreign Companies.

<u>Foreign (non-U.S.) Company Risk Generally</u>. Investments in foreign companies involve certain risks not generally associated with investments in the securities of U.S. companies including changes in currency exchange rates, unstable political, social and economic conditions, a lack of adequate or accurate company information, differences in the way securities markets operate, less secure foreign banks or securities depositories than those in the U.S. and foreign controls on investment. In addition, individual foreign country economies may differ favorably or unfavorably from the U.S. economy in such respects as growth of gross domestic product, rates of inflation, capital reinvestment, resources, self-sufficiency, and balance of payments position. Also, certain investments in foreign companies also may be subject to a foreign country’s withholding taxes. Foreign companies may use different accounting standards, and foreign securities markets may not be as liquid as U.S. securities markets. Foreign company investments also involve such risks as currency fluctuation risk, possible imposition of withholding or confiscatory taxes, possible currency transfer

restrictions, expropriation or other adverse political or economic developments and the difficulty of enforcing obligations in foreign countries. These risks may be greater in emerging market and in less developed countries.

Political Risk. The value of our portfolios' foreign company investments may be adversely affected by political and social instability in their home countries and by changes in economic or taxation policies in those countries. Investments in foreign companies will expose these portfolios to the direct or indirect consequences of political, social or economic changes in the countries that issue the securities or countries in which the issuers are located. Certain foreign countries in which our portfolios may invest, especially emerging market countries, have historically experienced, and may continue to experience, high rates of inflation, high interest rates, exchange rate fluctuations, large amounts of external debt, balance of payments and trade difficulties and extreme poverty and unemployment. Many of these countries are also characterized by political uncertainty and instability. The cost of servicing the country's external debt generally will be adversely affected by rising international interest rates because many external debt obligations bear interest at rates that are adjusted based upon international interest rates. In addition, with respect to certain foreign countries, there is a risk of the possibility of expropriation of assets, confiscatory taxation, difficulty in obtaining or enforcing a court judgment, economic, political or social instability, and diplomatic developments that could adversely affect investments in those countries.

Foreign Currency Risk. Foreign company investments often are purchased with and make interest payments in foreign countries' currencies. Therefore, if our portfolios invest in foreign companies, they will be subject to foreign currency risk, which means that the portfolios' values could decline as a result of changes in the exchange rates between foreign country currencies and the U.S. dollar. Certain foreign countries may impose restrictions on the ability of international companies to make payment of principal and interest to investors located outside the country due to blockage of foreign currency exchanges or otherwise. Furthermore, insofar as our portfolios invest in emerging markets, there is a higher risk of currency depreciation. Historically, most emerging market country currencies have experienced significant depreciation against the U.S.

dollar. Some emerging market country currencies may continue to fall in value against the U.S. dollar.

Fixed Income Securities Risk. Prices of fixed income securities tend to move inversely with changes in interest rates. Typically, a rise in rates will adversely affect fixed income security prices. The longer the effective maturity and duration of the client's portfolio, the more the portfolio's value is likely to react to interest rates. For example, securities with longer maturities sometimes offer higher yields, but are subject to greater price shifts as a result of interest rate changes than debt securities with shorter maturities. Some fixed income securities give the issuer the option to call, or redeem, the securities before their maturity dates. If an issuer calls its security during a time of declining interest rates, we might have to reinvest the proceeds in an investment offering a lower yield, and therefore might not benefit from any increase in value as a result of declining interest rates. During periods of illiquid market or rising interest rates, prices of callable issues are subject to increased price fluctuation.

Convertible Securities Risk. The value of a convertible security is influenced by both the yield of non-convertible securities of comparable issuers and by the value of the underlying common stock. The value of a convertible security viewed without regard to its conversion feature (*i.e.,* strictly on the basis of its yield) is sometimes referred to as its "investment value." A convertible security's investment value tends to decline as prevailing interest rate levels increase. Conversely, a convertible security's investment value increases as prevailing interest rate levels decline. However, a convertible security's market value will also be influenced by its "conversion value," which is the market value of the underlying common stock that would be obtained if the convertible security were converted. A convertible security's conversion value tends to increase as the price of the underlying common stock increases, and decrease as the price of the underlying common stock decreases. As the market price of the underlying common stock declines such that the conversion value is substantially below the investment value of the convertible security, the price of the convertible security tends to be influenced more by the yield of the convertible security. Thus, it may not decline in price to the same extent as the underlying common stock. If the market price of the underlying common stock increases to a point where the conversion value approximates or exceeds the investment value, the price of the convertible security tends to be influenced more by the market price of the underlying common stock. In the event of a liquidation of the issuing company, holders of convertible securities would be paid before the company's common stockholders. Consequently, the issuer's convertible securities entail less risk than its common stock.

Preferred Securities Risk. There are various risks associated with investing in preferred securities, including credit risk, interest rate risk, deferral and omission of distributions, subordination to bonds and other debt securities in a company's capital structure, call, reinvestment and income risk, limited liquidity, limited voting rights and special redemption rights.

Deferral and Omission Risk. Preferred securities may include provisions that permit the issuer, at its discretion, to defer or omit distributions for a stated period without any adverse consequences to the issuer.

Credit and Subordination Risk. Credit risk is the risk that a security in the client's portfolio will decline in price or the issuer of the security will fail to make dividend, interest or principal payments when due because the issuer experiences a decline in its financial status. Preferred securities are generally subordinated to bonds and other debt instruments in a company's capital structure in terms of having priority to corporate income, claims to corporate assets and liquidation payments, and therefore will be subject to greater credit risk than more senior debt instruments.

Interest Rate Risk. Interest rate risk is the risk that preferred securities will decline in value because of changes in market interest rates. When market interest rates rise, the market value of such securities generally will fall. Preferred securities with longer periods before maturity may be more sensitive to interest rate changes.

Call, Reinvestment and Income Risk. During periods of declining interest rates, an issuer may be able to exercise an option to redeem its preferred security at par earlier than scheduled which is generally known as call risk. Recent regulatory changes may increase call risk with respect to certain types of preferred securities. If this occurs, we may be forced to reinvest in lower yielding securities. This is known as reinvestment risk.

Liquidity Risk. Certain preferred securities may be substantially less liquid than many other securities, such as common stocks or U.S. Government securities. Illiquid securities involve the risk that the securities will not be able to be sold at the time we desire or at prices approximating the value at which we is carrying the securities on our books.

Limited Voting Rights Risk. Generally, preferred securities offer no voting rights with respect to the issuer unless preferred dividends have been in arrears for a specified number of periods, at which time the preferred security holders may elect a number of directors to the issuer's board. Generally, once all the arrearages have been paid, the preferred security holders no longer have voting rights. Hybrid-preferred security holders generally have no voting rights.

Special Redemption Rights. In certain varying circumstances, an issuer of preferred securities may redeem the securities prior to a specified date. For instance, for certain types of preferred securities, a redemption may be triggered by a change in U.S. federal income tax or securities laws. As with call provisions, a redemption by the issuer may negatively affect the return of the security held by the client.

Item 9: Disciplinary Information

As a registered investment adviser, KI is required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of KI or the integrity of KI's management.

Currently we have no information to discuss applicable to this item.

Item 10: Other Financial Industry Activities and Affiliations

KI or any of its management persons are not registered and does not have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

KI or any of its management persons are not registered and does not have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.

Apart from the Investment Advisory services business, Mahesh Jain is on the Board of Directors for an Information Technology business, under the name "Gray Matrix Inc", a California based Corporation

KI does not select other Advisers for its client advisory business

Item 11: Code of Ethics

The Code of Ethics includes general requirements that we comply with our fiduciary obligations to clients and applicable securities laws, and specific requirements relating to, among other things, personal trading, insider trading, conflicts of interest, and confidentiality of client information.

Under our Code of Ethics, KI would never involve in “front running”. This means KI will never purchase before placing a large order for a Client. KI may also buy or sell specific securities for their own accounts based on personal investment considerations aside from company or industry fundamentals that we do not deem appropriate to buy or sell for clients.

KI or any related person does not recommend to clients or buys or sells for clients’ accounts investments in which KI or related persons has a material financial interest. Any such material conflict of interest will be disclosed.

KI will provide a copy of the Code of Ethics to any client or prospective client upon request.

KI or its representatives does not invest in the same securities (or related securities, e.g., warrants, options or futures) that it recommends to clients. Investments are done based on suitability requirements of the Clients only.

Item 12: Brokerage Practices

In selecting a broker/dealer to effect portfolio transactions for our clients, KI has taken into consideration not only the available prices and rates of brokerage commissions, but other relevant factors that better improve our ability to serve our clients. These factors include:

- the regular and special execution capabilities of the brokers and/or dealers the research provided by the broker/dealer (including economic forecasts, investment strategy advice, fundamental and technical advice on individual securities, valuation advice and market analysis), which are expected to enhance KI general portfolio management capabilities
- the level of difficulty in executing trades
- the quality of the operational facilities and service department
- the expertise of the bond department
- the reputation, financial strength and stability of the broker-dealer
- the efficiency of fee and trade error resolution for our clients
- block trading and block positioning capabilities
- order of call

- the broker-dealers' willingness to execute related or unrelated difficult transactions
- the broker-dealers' online access to computerized data regarding client accounts
- referral of prospective investment advisory client

- clearance
- settlement
- other matters involved in the receipt of quality brokerage services generally

Consistent with the foregoing points, for efficient investment management service we recommend that clients designate IBKR as their broker-dealer and custodian. This is because IBKR provides KI products and services designed specifically for investment managers and their clientele, including, without limitation, product and account services, an electronic securities trading platform, secure online coverage of detailed client account information, and access to a broad range of independent research and information services. IBKR also provides KI's clients with monthly account statements, transaction confirmations, reports and other "back-office" and technical support. Because of this arrangement, KI generally has the ability to place client orders at discounted commission rates. As a result, we place the majority of client orders with IBKR. The receipt of IBKR services under the arrangement described above also may be considered as a conflict of interest, but we address this potential conflict through this disclosure, and we believe that the higher level of services that IBKR makes available for the clients' benefit outweighs any potential conflict that may arise by KI's receipt of these products and services. Further, if IBKR did not provide these services, clients likely would have to pay for comparable services from some other provider.

Research and Other Soft Dollar Benefits: Although KI generally recommends IBKR as the broker-dealer to be used for the execution of Client securities transactions, KI does not receive any Soft Dollar benefits or research materials.

Benefit from using client brokerage commissions to obtain research or other products and services: KI or any related person does not receive any research or other product or services in connection with the Client Securities Transactions.

Incentive to select or recommend a broker-dealer: KI recommends IBKR as the Broker-Dealer because of the efficient execution of Client Security Transactions and good Customer service. KI does not receive any incentive whatsoever from IBKR.

Causing clients to pay commissions higher than those charged by other broker dealers in return for soft dollar benefits: KI recommends IBKR as the Broker-Dealer of choice because of efficient execution of Client Security transactions. There may be other Broker-Dealers available for lower commission and KI would not have any problem going with them. However, this may not guarantee efficient execution of the transaction or good Customer service and KI would make the Clients aware of the same based on their experience.

Products and Services KI acquired with client brokerage commissions over the past fiscal year: We will not acquire any products or services with client brokerage commissions

Brokerage for Client Referrals:
KI does not engage in a practice where we direct any client transactions to a particular broker-dealer in return for a client referral

Directed Brokerage: KI recommends IBKR as the Broker-Dealer and Custodian but is willing to work with the Client designated Broker-Dealer as well.

Aggregation of Securities Transactions: KI generally does not engage in aggregation of securities transaction unless it is determined that aggregation is in the best interests of the clients. Trade aggregation is usually sought to obtain lower commissions and costs or a better transaction price. When orders are aggregated, the price paid by each account is the average price of the order. Transactions costs are allocated to each client on a pro-rata basis, based upon the ratio of the amount of particular issue of securities allocated to the account to the overall amount of that issue purchased.

KI may not aggregate securities orders for particular client accounts in cases where it believes that aggregation is inconsistent with the investment objectives and guidelines for the client accounts participating in the trade. In such cases, these clients may receive less favorable execution in terms of price or transaction costs. It is KI policy that non-aggregated trades are not prioritized in any manner that favors one group of similarly situated clients over another.

Item 13: Review of Accounts

Mahesh Jain, CCO, reviews each client account on a weekly basis or more frequently if prompted by specified price movements, market conditions or other developments. Mr. Jain makes sure that specific client portfolio objectives are continually being met in compliance with the Client's risk tolerance.

Mahesh Jain uses email as a constant mode of communication but prefers quarterly meetings in person with each client, the client's investment objective and goals. More frequent meetings will be held at the request of clients. Upon a client's written request, KI will consult with a client's accountants or tax preparers to coordinate these objectives and goals with the client's tax planning.

KI provides clients with a written performance report for their account at the end of each quarter. Annually, IBKR provides KI clients with an end of the year written capital gains report for tax purposes. IBKR also provides clients with a 1099 showing all taxable interest payments from stock dividends, bond payments, CDs, and other sources of taxable income.

Item 14: Client Referrals and Other Compensation

KI does not engage in receiving economic benefit from Client in exchange of providing Investment advice or other advisory services. KI does not engage in a practice of using Solicitors for Client acquisition or referrals. Also, see Item 12 above for a discussion of KI directing brokerage for referrals.

Item 15: Custody

Client may prefer to go with its own Custodian buf if not, KI client's assets are held by custodian IBKR. Stock shares are held at Depository Trust Company under the Participant Account Name of Interactive Brokers

Clients will receive monthly statements from IBKR that shows the securities held in their account at the end of the month, all trades made during the month, and all dividend and interest payments. KI provides clients with financial performance of the account for the quarter and the year. KI urges clients to carefully review IBKR's statements and compare these official custodial records to the account statements provided by KI. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Item 16: Investment Discretion

KI usually receives discretionary authority from the client in the form of a Limited Power of Attorney (LPOA) in the client's portfolio management agreement at the outset of an advisory relationship, giving us the power to select the securities to be bought and sold in the account. However, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account.

When selecting securities and determining amounts to purchase, KI observes the investment objectives, risk tolerance, and any other limitations or restrictions placed on the accounts by the clients for which it advises.

Because we engage in an investment advisory business and manage more than one account, there may be conflicts of interest over our time devoted to managing any one account and the allocation of investment opportunities among all accounts managed by us. We attempt to resolve all such conflicts in a manner that is generally fair to all of our clients. We may give advice and take action with respect to any of our clients that may differ from advice given or the timing or nature of action taken with respect to any particular client so long as it is our policy, to the extent practicable, to allocate investment opportunities over a period of time on a fair and equitable basis relative to other clients. We are not obligated to acquire for any account any security that we may acquire for our accounts or for the account of any other client, if in our absolute discretion, it is not practical or desirable to acquire a position in such security for that account.

Lastly, in a situation of death or incapacitation, KI maintains a Business Continuity Plan that can be provided to the Client on request

Item 17: Voting Client Securities

KI will vote all proxies in advisory accounts unless the client reserves the right to vote his/her securities. Proxies over which KI has voting authority shall be voted in a manner consistent with KI's economic criteria and the best economic interest of the client.

The following is a summary of the guidelines used by KI to vote client proxies.

Director Related Issues. KI will generally vote for any shareholder proposal that favors independence of directors, and allows for maximum control, by shareholders (as opposed to management), of the composition and tenure of the Board of Directors.

Auditors. KI will generally vote to allow shareholders to elect the auditors of a corporation. KI will generally vote against the ratification of existing auditors.

Executive and Director Compensation. KI will always vote for increased disclosure of compensation and against any shareholder proposal that favors highly compensated executive and upper level management personnel at the expense of lower paid personnel. This category would include option grants, stock-based incentive plans, golden parachutes, and ESOPs.

Social and Environmental Proposals. KI will vote for proposals to add women and minorities to boards, and the inclusion of language in EEO statements barring discrimination on the basis of sexual orientation. KI will vote in favor of shareholder proposals to implement human rights standards and workplace codes of conduct both in the United States and abroad. Shareholder proposals seeking greater disclosure on environmental practices will be supported, including the adoption of the CERES Principles. KI will vote for shareholder proposals to label products that contain genetically modified organisms ("GMO"), and/or to phase out the use of GMOs.

Capital Structure. KI evaluates capital structure issues on a case by case basis, but generally votes in favor of proposals that strengthen the company's balance sheet and encourage market liquidity.

Voting Structure, KI generally votes in favor of the adoption of cumulative voting and confidential voting, including the use of independent tabulators and inspectors.

Proxy Contest Defenses / Takeover Defenses: KI will vote against any proposal to prohibit shareholder ability to call special meetings and for proposals that seek to remove anti-takeover provisions. KI will favor proposals that allow shareholders equal access to information and are generally shareholder-friendly.

Mergers and Corporate Restructurings. KI will vote on a case by case basis, using best judgment to determine whether the proposed merger / restructuring / reorganization is in the best interests of the shareholders and employees of the corporation.

A client may instruct us in writing if the client wants to direct our vote in a particular proxy solicitation.

If a material conflict of interest over proxy voting arises between us and a client, we will vote all proxies in accordance with the policy described above. If we determine that this policy does not adequately address the conflict of interest, we will notify the client of the conflict and request that the client consent to our intended response to the proxy solicitation. If the client consents to our intended response or fails to respond to the notice within a reasonable period of time specified in the notice, we will vote the proxy as described above. If the client objects to our intended response, we will vote the proxy as directed by the client.

A client can obtain a copy of our proxy voting policy and a record of votes cast by us on behalf of that client by contacting Mahesh Jain at 949-285-0006 or mahesh@kuberinvestments.com.

Item 18: Financial Information

KI has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to its clients, and has not been the subject of a bankruptcy proceeding.

KI does not require the prepayment of fees of more than $500 per client and for six months or more in advance. KI invoices the Client annually in arrears at the end of the Calendar year.

Item 19: Requirements for State Registered Advisers

A. Mahesh Jain is a CCO at Kuber Investments. His education background is Bachelor in Electronics Engineering from Mumbai University, India.
B. Mahesh Jain has been working in the IT industry for the last 25 years and currently a Board of Director in Gray Matrix Inc, a California based corporation.
C. KI does not engage in performance based fee compensation. KI practices a Fee Only Advisory business

D. KI has not been involved in any arbitration claims nor has been liable in any civil or self regulatory organization or administrative proceeding of any respect like fraud, False statements, omissions, theft, embezzlement, bribery, forgery, counterfeiting, extortion, dishonesty, unfair or any unethical practice etc. till date.
E. KI or any of its executive management does not have any relationship or arrangement with any Issuer of securities

Item 1: Cover Page

Mahesh Jain
CRD# 6951859

Gray Matrix Inc DBA Kuber Investments
CRD# 297229
101 Blaze
Irvine, California 92618

T: 949-285-0006

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June 01, 2018

This brochure supplement provides information about Mahesh Jain that supplements the Kuber Investments. Form ADV Part 2A Brochure. You should have received a copy of that brochure. Please contact Mahesh Jain at 949-285-0006 or by email at mahesh@kuberinvestments.com if you did not receive our Brochure or if you have any questions about the contents of the supplement.

Item 2: Educational Background and Business Experience

Mr. Jain received his Bachelors of Electronics Engineering from Mumbai University, India in 1993. He has been working in the field of IT (Information Technology) for the last 25 years. Mahesh has passed the NAASA Series 65 exam, required for the registration of Investment Advisor

Mahesh Jain is the CCO of Kuber Investments (KI). Apart from this he is on the Board of Directors for an IT business under the name Gray Matrix Inc. This business is about Software development / consulting in the field of Information Technology. The address of this business is 101 Blaze Irvine CA 92618.

Employment History:

From	To	Name	Investment related?	City	State	Country	Position
06/2006	01/2011	iRise	No	El Segundo	CA	USA	Technica l Architect

Item 3: Disciplinary Information

KI does not have any legal or disciplinary events to report that are material to a client's or prospective client's evaluation of the advisory business or the integrity of the management. If case of any such disciplinary events, KI will update the brochure promptly

Item 4: Other Business Activities

Apart from the Investment Advisory business, Mahesh Jain is on the Board of Director of an Information Technology business under the name of Gray Matrix Inc, a California based corporation

Item 5: Additional Compensation

KI or any supervised person does not engage in an arrangement where a non-client provides economic benefit in exchange of Investment advisory services

Item 6: Supervision

As President and CEO of KI, Mahesh Jain is not directly supervised by other persons. Mr. Jain is subject to KI's compliance program policies and procedures, including KI's Code of Ethics. Mr. Jain advisory activities involves working as a portfolio manager of KI's clients pursuant to the Client's objectives and risk tolerance

Item 7: Requirements for State-Registered Advisers

A. Mahesh Jain has not been involved in any arbitration claims nor has been liable in any civil or self regulatory organization or administrative proceeding of any respect like fraud, False statements, omissions, theft, embezzlement, bribery, forgery, counterfeiting, extortion, dishonesty, unfair or any unethical practice etc. till date
B. Mahesh Jain has not been a subject of a bankruptcy petition as of current date