

SONRISE OPPORTUNITY

SONRISE OPPORTUNITY CORPORATION

Form ADV Part 2A Appendix 1

Wrap Fee Program Brochure

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Required Texas Disclosure — Client Receipt & Right of Rescission (TAC §116.12(a))

Client acknowledges receipt of Part 2A Appendix 1 of Form ADV (Wrap Fee Program Brochure). If the appropriate disclosure statement was not delivered to the client at least 48 hours prior to the client entering into any written or oral advisory contract with this investment adviser, then the client has the right to terminate the contract without penalty within five business days after entering into the contract. For the purposes of this provision, a contract is considered entered into when all parties to the contract have signed the contract, or, in the case of an oral contract, otherwise signified their acceptance, any other provisions of this contract notwithstanding.

This wrap fee program brochure provides information about the qualifications and business practices of Sonrise Opportunity Corporation. If you have any questions about the contents of this brochure, please contact us at (346) 840-4066. 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 Sonrise Opportunity Corporation also is available on the SEC's website at www.adviserinfo.sec.gov.

Registration as an investment adviser does not imply a certain level of skill or training.

Item 2 — Material Changes

This is the initial Wrap Fee Program Brochure for Sonrise Opportunity Corporation. There are no material changes to report at this time. Future amendments will summarize material changes in this section. Clients may request a free copy of the current Brochure at any time by calling (346) 840-4066 or visiting www.gosonrise.com. An updated Brochure will be delivered within 120 days of fiscal year end.

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Item 4 — Services, Fees, and Compensation

A. Description of the Wrap Fee Program

Sonrise Opportunity sponsors and manages a discretionary wrap fee investment advisory program (the “Program”). Under the Program, clients pay a single asset-based fee covering:

- Ongoing portfolio management, including construction, monitoring, and rebalancing of client portfolios;
- Initial and ongoing investment analysis and strategy consultation;
- Investor profile development and suitability assessment;
- Trade execution through the designated custodian (Charles Schwab & Co., Inc.) without separate per-transaction brokerage commissions; and
- Quarterly account statements and semi-annual advisory review meetings.

Sonrise Opportunity serves as both the sponsor and the sole portfolio manager of the Program. All portfolio management decisions are made internally. No third-party sub-advisers or external portfolio managers participate in the Program at this time.

B. Wrap Fee Schedule

Clients pay a single, all-inclusive annual advisory fee based on the market value of assets under management. The fee schedule is as follows:

Assets Under Management	Annual Wrap Fee
Under \$500,000	1.25% per annum
\$500,001 – \$1,500,000	0.90% per annum
\$1,500,001 – \$2,500,000	0.60% per annum
\$2,500,001 – \$5,000,000	0.30% per annum
Over \$5,000,000	0.25% per annum

The annual wrap fee is billed and payable quarterly in advance, based on the account balance on the last day of the previous calendar quarter. Fees are generally deducted directly from client accounts. If the advisory agreement is executed at a time other than the first day of a calendar quarter, fees will be prorated for the days remaining in that quarter. Sonrise Opportunity's fees are negotiable.

Is a Wrap Fee Program Right for You?

A wrap fee program may cost more or less than purchasing advisory and brokerage execution services separately, depending on the level of trading activity in your account. Clients with lower levels of trading activity may pay more under the wrap fee structure than under a commission-based arrangement. Clients should compare the all-inclusive wrap fee with the separate cost of advisory services and trade execution before enrolling. Sonrise Opportunity will discuss this comparison with prospective clients upon request.

C. Services Included in the Wrap Fee

The wrap fee covers: (1) all portfolio management services provided by Sonrise Opportunity; (2) trade execution through Charles Schwab & Co., Inc. ("Schwab") without separate brokerage commissions or transaction fees for trades executed through Schwab; and (3) custodial and account administration services through Schwab.

D. Services and Costs Not Included in the Wrap Fee

The following are not covered by the wrap fee and are borne by the client in addition to the advisory fee:

- Internal management fees and operating expenses embedded within the no-load mutual funds held in the Program. These are disclosed in each fund's prospectus and reduce investment returns.
- Redemption fees or contingent deferred sales charges imposed by mutual fund companies, if applicable.
- Schwab administrative fees for services outside the normal scope of the Program (e.g., wire transfer fees, returned check fees).
- Transaction costs incurred when trades are executed through broker-dealers other than Schwab, when Sonrise Opportunity determines that doing so is in the client's best interest.

- Taxes, including any taxes arising from securities transactions in the account.

E. Conflict of Interest — Compensation Structure

Material Conflict of Interest

Because Sonrise Opportunity receives its compensation as a percentage of assets under management, a conflict of interest exists in that the Firm benefits financially from growth in client assets and from recommending that clients add assets to the Program. Additionally, because trade execution through Schwab is included in the wrap fee, Sonrise Opportunity has a financial incentive to direct trades through Schwab rather than seeking potentially lower execution costs elsewhere. When trades are executed outside of Schwab, the client may incur additional transaction costs. Sonrise Opportunity seeks best execution for all trades and discloses this conflict so that clients may evaluate it independently.

F. Insurance Commission Conflict

David Roskoph, Managing Advisor and principal of Sonrise Opportunity, holds a Life and Health Insurance license in Texas and may, in the future, receive normal and customary commissions from the sale of fixed indexed annuities, universal life insurance, whole life insurance, and long-term care insurance. Mr. Roskoph is not currently engaged in insurance sales activity and is not currently receiving insurance commissions, consistent with his current Form U4 disclosure. Were this activity to become active, the resulting commissions would create a financial incentive that could influence recommendations. Sonrise Opportunity's fiduciary obligation requires that all recommendations be made in the client's best interest. Clients are not required to purchase insurance products through Mr. Roskoph and may obtain such products from any source.

G. Non-Assignment Clause (Required — Texas TAC §116.12(c))

Non-Assignment Clause — Required Notice (Texas TAC §116.12(c)): Sonrise Opportunity's advisory agreement contains a provision prohibiting assignment of the advisory contract by Sonrise Opportunity without the prior written consent of the client, as required by Texas Administrative Code §116.12(c). Clients will receive written notice of any proposed assignment and must provide affirmative written consent before any such assignment becomes effective.

H. External Account Advisory Services

In addition to the Program, Sonrise Opportunity may provide advisory oversight for accounts held at separate broker-dealers or in employer-sponsored retirement plans. The fee for such services is one-half (1/2) of the standard Program fee schedule, and is also negotiable. These arrangements are not wrap fee programs; trade execution costs are not included in the external advisory fee.

I. Termination and Fee Refund

Either party may terminate the advisory agreement at any time upon written notice. All fees will be prorated to the date of termination, and any unearned portion of prepaid fees will be promptly refunded. If terminated during a calendar quarter, fees will be prorated based on the days the agreement was in effect.

Item 5 — Account Requirements and Types of Clients

A. Eligible Clients

The Program is available to: individuals (including high-net-worth individuals); pension and profit-sharing plans; trusts; estates; charitable organizations; and corporations and other business entities.

B. Account Minimums

There is no minimum account size required to participate in the Program at this time. Sonrise Opportunity reserves the right to establish minimum account requirements in the future, which will be disclosed in an updated Brochure. Prospective clients should contact the Firm to confirm current requirements.

C. Investor Profile and Suitability

Each client completes a written investor profile at the onset of the Program describing their investment objectives, liquidity needs, time horizon, risk tolerance, and relevant financial circumstances. Sonrise Opportunity uses this information to determine the appropriate portfolio allocation among the Moderate Portfolio, the Growth Portfolio, and the Opportunity Portfolio. The investor profile is reviewed annually and updated whenever a client's circumstances change materially. Clients should notify Sonrise Opportunity promptly of any material changes.

D. Client-Imposed Restrictions

Clients may impose reasonable written restrictions on the management of their accounts, including restrictions on specific securities, sectors, or investment types. Sonrise Opportunity will honor reasonable restrictions to the extent consistent with the Firm's strategies and applicable law. Clients should be aware that restrictions may limit the Firm's ability to fully implement the selected strategy and may adversely affect performance.

E. Account Additions and Withdrawals

Clients may add to or withdraw from their accounts at any time, subject to Sonrise Opportunity's right to terminate an account. Additions may be cash or in-kind securities, subject to the Firm's right to liquidate transferred securities or decline specific securities. Withdrawals are subject to normal securities settlement procedures. Because Program portfolios are designed as long-term investments, withdrawals may impair achievement of investment objectives.

Item 6 — Portfolio Manager Selection and Evaluation

A. The Portfolio Manager

Sonrise Opportunity serves as the sole portfolio manager for all Program accounts. All investment decisions are made by the Firm's Managing Advisor, David Roskoph. No external sub-advisers or third-party managers are used in the Program at this time. Clients wishing to review Mr. Roskoph's background and qualifications may do so by reviewing the Form ADV Part 2B Brochure Supplement, a copy of which is available upon request.

B. Investment Philosophy and Strategy Overview

Sonrise Opportunity manages three distinct model portfolios — the Moderate Portfolio, the Growth Portfolio, and the Opportunity Portfolio — each built upon a single, unifying investment philosophy: that disciplined investors should not be compelled to choose between participating in rising markets and protecting themselves against falling ones. Each Portfolio is constructed exclusively from no-load mutual funds and is designed to hold both long and short positions simultaneously, providing meaningful exposure to assets that may rise in value while maintaining positions that may benefit when other markets fall.

The Portfolios invest across a deliberately wide opportunity set: domestic and global equities, fixed income, sector-specific strategies, currencies, cryptocurrency, energy, and precious metals. By maintaining positions across many uncorrelated and often inversely correlated categories, each Portfolio seeks to remain relevant and potentially profitable across a full range of market conditions.

The three Portfolios are differentiated primarily by their targeted level of volatility relative to the S&P 500, as measured by standard deviation. The Moderate Portfolio targets approximately 60% of the S&P 500's standard deviation, the Growth Portfolio targets approximately 100%, and the Opportunity Portfolio targets approximately 150%. Investors should select the Portfolio whose risk profile aligns with their own documented investment objectives, time horizon, and risk tolerance as established in their investor profile.

C. The Three Portfolios

The Moderate Portfolio

Measured participation across all market environments

The Moderate Portfolio is designed for investors who seek meaningful participation in diversified market opportunities while maintaining a portfolio whose overall volatility is materially lower than the broad equity market. The Portfolio targets a standard deviation of approximately 60% of that of the S&P 500. The Portfolio manages risk through diversification, disciplined position sizing, and the deliberate inclusion of both long and short exposures across uncorrelated asset categories.

During periods of significant market stress, the portfolio may shift a portion or all of its assets into Money Market Funds, prioritizing capital preservation when the risk-reward environment becomes unfavorable. The Moderate Portfolio is appropriate for investors with a medium to long-term time horizon who wish to move beyond a purely long-only strategy but who prefer a measured approach to volatility. It is not guaranteed against loss, and clients should be prepared to bear the risk of loss.

Portfolio Characteristic	Description
Volatility Target	Approximately 60% of S&P 500 Standard Deviation
Directional Posture	Long and Short
Portfolio Composition	No-Load Mutual Funds Exclusively
Minimum Holding Period	See “Holding Period Approach” in Item 8 of Sonrise Opportunity’s Form ADV Part 2A
Cash Reserve Authority	May hold all or a portion in Money Market Funds

Investment Universe — Moderate Portfolio

The Portfolio is constructed exclusively from no-load mutual funds selected from the following asset categories:

- Domestic equity mutual funds — long and short positions across large-cap, mid-cap, small-cap, and broad market strategies
- Global and international equity mutual funds — long and short positions across developed markets, emerging markets, and single-country strategies
- Fixed income mutual funds — long and short positions across U.S. government, corporate, high-yield, and international debt
- Sector mutual funds — long and short positions targeting specific industries and economic sectors
- Cryptocurrency mutual funds — long and short positions in digital asset markets through regulated fund vehicles
- Precious metals mutual funds — long and short positions in gold, silver, platinum, and related resource strategies
- Energy mutual funds — long and short positions in oil, natural gas, and the broader energy complex
- Currency mutual funds — long and short positions across major and emerging market currency pairs
- Money Market Funds — utilized for capital preservation during periods of elevated risk or portfolio repositioning

The Growth Portfolio

Full-market participation with broad directional flexibility

The Growth Portfolio is designed for investors who are prepared to accept equity-market-level volatility in pursuit of returns across a diverse and broadly positioned portfolio. The Portfolio targets a standard deviation of approximately 100% of that of the S&P 500. Unlike a passive index fund, the Growth Portfolio positions actively across domestic and international equities, fixed income, sector strategies, currencies, precious metals, energy, and cryptocurrency mutual funds.

The Portfolio’s long positions reflect the Adviser’s conviction about areas of relative opportunity; the short positions serve both as risk mitigants and as independent return sources. The Growth Portfolio is appropriate for investors with a long-term time horizon and genuine tolerance for equity-level volatility who seek an active, multi-directional approach to market participation.

Portfolio Characteristic	Description
Volatility Target	Approximately 100% of S&P 500 Standard Deviation
Directional Posture	Long and Short
Portfolio Composition	No-Load Mutual Funds Exclusively
Minimum Holding Period	See “Holding Period Approach” in Item 8 of Sonrise Opportunity’s Form ADV Part 2A
Cash Reserve Authority	May hold all or a portion in Money Market Funds

Investment Universe — Growth Portfolio

The Portfolio is constructed exclusively from no-load mutual funds selected from the following asset categories:

- Domestic equity mutual funds — long and short positions across large-cap, mid-cap, small-cap, and broad market strategies
- Global and international equity mutual funds — long and short positions across developed markets, emerging markets, and single-country strategies
- Fixed income mutual funds — long and short positions across U.S. government, corporate, high-yield, and international debt
- Sector mutual funds — long and short positions targeting specific industries and economic sectors
- Cryptocurrency mutual funds — long and short positions in digital asset markets through regulated fund vehicles
- Precious metals mutual funds — long and short positions in gold, silver, platinum, and related resource strategies
- Energy mutual funds — long and short positions in oil, natural gas, and the broader energy complex
- Currency mutual funds — long and short positions across major and emerging market currency pairs
- Money Market Funds — utilized for capital preservation during periods of elevated risk or portfolio repositioning

The Opportunity Portfolio (Aggressive)

Maximum growth potential across all market environments

The Opportunity Portfolio is the Firm’s flagship strategy and is designed for investors who seek the highest level of growth potential available within the Sonrise Opportunity family of portfolios. The Portfolio targets a standard deviation of approximately 150% of that of the S&P 500 — a deliberately elevated level of volatility that reflects the Portfolio’s mandate to pursue maximum growth across all market environments. Investors considering the Opportunity Portfolio must genuinely understand and accept that higher potential returns are accompanied by commensurately higher potential losses.

The Opportunity Portfolio is intended to pursue the highest level of growth potential within the Sonrise Opportunity family of portfolios, using a regulated, transparent, and accessible structure built exclusively

from no-load mutual funds. This Portfolio should not constitute a disproportionate share of a client's total investable assets unless the client has specifically directed otherwise in writing and the Adviser has determined such concentration is consistent with the client's overall financial situation.

⚠ Risk Disclosure — Opportunity Portfolio

The Opportunity Portfolio is the Firm's highest-risk strategy. This Portfolio is NOT appropriate for investors with time horizons shorter than one year and should not represent a disproportionately large share of any investor's total portfolio unless specifically requested by the client above Sonrise Opportunity's recommendation. Clients should be prepared to bear the risk of significant losses.

Portfolio Characteristic	Description
Volatility Target	Approximately 150% of S&P 500 Standard Deviation
Directional Posture	Long and Short
Portfolio Composition	No-Load Mutual Funds Exclusively
Minimum Holding Period	See "Holding Period Approach" in Item 8 of Sonrise Opportunity's Form ADV Part 2A
Cash Reserve Authority	May hold all or a portion in Money Market Funds

Investment Universe — Opportunity Portfolio

The Portfolio is constructed exclusively from no-load mutual funds selected from the following asset categories:

- Domestic equity mutual funds — long and short positions across large-cap, mid-cap, small-cap, and broad market strategies
- Global and international equity mutual funds — long and short positions across developed markets, emerging markets, and single-country strategies
- Fixed income mutual funds — long and short positions across U.S. government, corporate, high-yield, and international debt
- Sector mutual funds — long and short positions targeting specific industries and economic sectors
- Cryptocurrency mutual funds — long and short positions in digital asset markets through regulated fund vehicles
- Precious metals mutual funds — long and short positions in gold, silver, platinum, and related resource strategies
- Energy mutual funds — long and short positions in oil, natural gas, and the broader energy complex
- Currency mutual funds — long and short positions across major and emerging market currency pairs
- Money Market Funds — utilized for capital preservation during periods of elevated risk or portfolio repositioning

D. Methods of Analysis

Sonrise Opportunity uses the following analytical methods in managing Program accounts:

- **Cyclical Analysis:** Statistical identification of predictable recurring events extrapolated into the future, based on the premise that cyclical forces drive price movements in financial markets.
- **Fundamental Analysis:** Assessment of a fund's or market's financial characteristics, competitive environment, and economic backdrop, performed on historical and present data to form forward-looking assessments.
- **Technical Analysis:** Price and volume analysis using relative strength indexes, moving averages, regressions, inter-market correlations, market cycles, and chart pattern recognition.
- **Quantitative Analysis:** Use of models or algorithms to evaluate assets, involving searches of large datasets for patterns such as correlations among liquid assets or price-movement trends.
- **Qualitative Analysis:** Subjective assessment addressing unquantifiable factors such as management expertise, industry cycles, and macroeconomic sentiment.
- **Sector Analysis:** Identification of industries or economic sectors likely to exhibit superior or inferior performance, taking into account customer base, market share, growth, competition, regulation, and business cycles.
- **Behavioral Analysis:** Assessment of market conditions driven primarily by investor emotion rather than fundamental valuation. Identifying extremes of fear and greed presents potential opportunities on both the long and short side.

E. Risks of Investing in the Program

Important Risk Disclosure

Investing in securities, including no-load mutual funds, involves risk of loss that clients should be prepared to bear. The use of short-positioned mutual funds introduces risks distinct from traditional long-only investing, including the possibility of losses in rising markets. Past performance is not indicative of future results. No investment strategy or method of analysis can guarantee profits or protect against losses. Standard deviation targets described herein are objectives, not guarantees, and actual volatility may differ materially depending on market conditions.

Principal risks include:

- **Market Risk:** The value of investments may decline due to general market conditions, economic factors, or geopolitical events.
- **Short Position Risk:** Mutual funds that seek to profit from declining markets may lose significant value in rising markets and may not perform as expected over varying holding periods.
- **Cryptocurrency Risk:** Mutual funds with exposure to digital assets are subject to high volatility, regulatory uncertainty, and rapidly evolving market structures.
- **Currency Risk:** Investments in currency-linked securities or international funds expose clients to fluctuations in foreign exchange rates.
- **Commodity Risk:** Investments tied to metals and energy carry volatility specific to commodity markets and may be affected by supply, demand, and geopolitical factors.
- **Liquidity Risk:** Certain no-load mutual funds may experience periods of reduced liquidity, particularly during market stress or periods of unusual redemption activity.
- **Concentration Risk:** Sector-specific or country-specific positions may result in greater volatility than broadly diversified portfolios.
- **Interest Rate Risk:** Fixed income mutual funds may decline in value as interest rates rise, and short-positioned fixed income funds may decline in value as rates fall.
- **Manager Risk:** The performance of client accounts depends significantly on the investment judgment of Sonrise Opportunity's Managing Advisor.

F. Proxy Voting

Sonrise Opportunity does not vote proxies on behalf of Program clients. Clients retain full responsibility for receiving and voting proxies for all securities in their accounts. Proxy materials are forwarded directly to clients by the issuer or custodian. General proxy voting information is available upon request, but Sonrise Opportunity does not make specific voting recommendations and does not exercise voting authority.

G. Brokerage Practices and Trade Execution

Sonrise Opportunity recommends Charles Schwab & Co., Inc. ("Schwab") as the Program custodian and broker-dealer. Schwab is a FINRA-registered broker-dealer and member SIPC. Sonrise Opportunity is not affiliated with Schwab. Clients are not required to use Schwab; however, use of a different custodian may limit Program services or result in additional costs. Clients open accounts directly with Schwab by entering into a separate account agreement.

Although execution through Schwab is included in the wrap fee, Sonrise Opportunity may execute trades through other broker-dealers when doing so is in the client's best interest, in which case the client may incur additional transaction costs. Sonrise Opportunity seeks best execution for all trades. Orders for multiple accounts may be aggregated to facilitate best execution and equitable allocation.

H. Review of Accounts

Program accounts are reviewed on an ongoing basis. The Managing Advisor monitors portfolio positions, market conditions, and client investment objectives continuously throughout each business day. At least quarterly, Sonrise Opportunity produces account statements showing account value, positions, and performance. The Managing Advisor meets with each client semi-annually, in person or by teleconference. Clients also receive account confirmations and statements directly from Schwab at least quarterly, which they are encouraged to compare with Sonrise Opportunity's statements.

Item 7 — Client Information Provided to Portfolio Managers

Because Sonrise Opportunity serves as the sole portfolio manager, all client information is maintained within the Firm. No client information is shared with external portfolio managers. The Managing Advisor considers the following information when managing each account:

- Complete investor profile (objectives, risk tolerance, time horizon, liquidity needs);
- Written restrictions or limitations imposed by the client;
- Relevant tax information provided by the client;
- Information about the client's other investments or assets, to the extent disclosed; and
- All updates to the foregoing provided by the client from time to time.

Clients are responsible for keeping their investor profile current. Sonrise Opportunity is not responsible for investment decisions made on the basis of outdated client information. Clients should notify the Firm promptly of any material changes to their financial situation, objectives, or risk tolerance.

Item 8 — Client Contact with Portfolio Managers

Clients have unrestricted direct access to the Managing Advisor, David Roskoph, who manages all Program accounts. There are no limitations on client contact with the portfolio manager. Clients may reach the Managing Advisor at:

- Telephone: (346) 840-4066
- Website: www.gosonrise.com
- Mail: 1722 Pecan Crossing Dr, Richmond, TX 77406

In addition to scheduled semi-annual review meetings, clients are encouraged to contact the Managing Advisor whenever they have questions about their accounts, experience changes in their financial situation, or have concerns about their portfolios.

Item 9 — Additional Information

A. Disciplinary Information

In 2018, the Washington Department of Financial Institutions, Securities Division entered a Consent Order involving Mr. Roskoph and his former firm, Rennaisat Capital, Inc., relating to net worth, financial reporting, and audited financial statement delivery requirements applicable to a private fund Rennaisat then managed. The matter was resolved by consent, without a hearing and without any finding of client loss, misappropriation, breach of fiduciary duty, misrepresentation, or fraud. Other than this matter, Sonrise Opportunity Corporation and its management persons have no legal or disciplinary history to disclose. The full details of this event, including its findings and sanctions, are disclosed in Item 9 of Sonrise Opportunity's Form ADV Part 2A Firm Brochure, which accompanies this Appendix.

B. Other Financial Industry Activities and Affiliations

David Roskoph holds a Life and Health Insurance license in Texas and may, in the future, receive commissions from the sale of insurance products including fixed indexed annuities, universal life insurance, whole life insurance, and long-term care insurance. He is not currently engaged in insurance sales activity or receiving insurance commissions, consistent with his current Form U4 disclosure. Were this activity to become active, it would present a potential conflict of interest, as disclosed in Item 4.F. Sonrise Opportunity has no other financial industry affiliations required to be disclosed.

C. Code of Ethics and Personal Trading

Sonrise Opportunity has adopted a written Code of Ethics governing ethical conduct, fiduciary obligations, personal securities trading (including preclearance and reporting), conflicts of interest, political contributions, gifts and entertainment, and electronic communications. A copy is available to clients and prospective clients upon request. Firm personnel may hold securities also held or being considered for Program accounts; all such trading is subject to Code requirements designed to ensure client interests are placed first.

D. Client Referrals

Sonrise Opportunity may pay referral fees to promoters or solicitors introducing prospective clients to the Program, in accordance with applicable Texas and federal law, including requirements of the Texas Securities Act and the Investment Advisers Act of 1940. Referral fees are paid solely from Sonrise Opportunity's compensation and do not result in additional charges to referred clients. Clients introduced through a promoter receive written disclosure of the arrangement at the time of introduction.

E. Custody

Sonrise Opportunity does not maintain physical custody of client assets, which are held by Schwab or another qualified custodian. The Firm is deemed to have constructive custody by virtue of its authority to deduct advisory fees from client accounts. Clients receive statements directly from the qualified custodian at least quarterly and are encouraged to compare these with Sonrise Opportunity's statements. Discrepancies should be reported promptly to (346) 840-4066.

F. Financial Information

Sonrise Opportunity does not require or solicit prepayment of fees of more than \$500 per client six or more months in advance. Accordingly, a balance sheet is not required to be included in this Brochure. Sonrise Opportunity has no financial condition that would impair its ability to meet contractual or fiduciary commitments to clients and has never been the subject of a bankruptcy proceeding.

G. Privacy Policy

Sonrise Opportunity is committed to protecting client privacy. We do not sell personal client information to third parties. We share information with third parties only as necessary to provide Program services, administer accounts, or comply with applicable law, using appropriate physical, electronic, and procedural safeguards. Clients may request a full Privacy Policy at any time by contacting (346) 840-4066.

Item 19.E — Relationships with Issuers of Securities

Neither Sonrise Opportunity Corporation nor Mr. David Roskoph, the Firm's sole management person, has any relationship or arrangement with any issuer of securities, consistent with the Firm's Form ADV Part 2A, Item 19.E. (Mr. Roskoph's Life and Health Insurance licensure, disclosed in Item 4.F and Item

9.B of this Brochure, is a compensation-related conflict addressed there; it does not involve a relationship with an issuer of securities and so is not repeated here.)

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This Brochure does not constitute legal advice. Registration as an investment adviser does not imply a certain level of skill or training. This Brochure has not been reviewed or approved by the Texas State Securities Board.