

SONRISE OPPORTUNITY CORPORATION

Form ADV Part 2A — Firm Brochure

Registered Investment Adviser

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⚠ Client Receipt and Right of Rescission — Required Disclosure (Texas TAC §116.12(a)) Client acknowledges receipt of Part 2 of Form ADV; a disclosure statement containing the equivalent information; or a disclosure statement containing at least the information required by Part 2A Appendix 1 of Form ADV, if the client is entering into a wrap fee program sponsored by the investment adviser. 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 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 Firm Brochure prepared by Sonrise Opportunity Corporation and filed as Part 2A of Form ADV. Because this is our first brochure, there are no material changes to report at this time.

In the future, this Item will summarize any material changes made to this brochure since the last annual update. We will provide clients with a summary of material changes either directly or by reference to the updated brochure within 120 days of our fiscal year end. Clients may request a complete copy of our current brochure at any time by contacting us at (346) 840-4066 or by visiting our website at www.gosonrise.com.

Item 3 — Table of Contents

Item 1 — Cover Page.....	1
Item 2 — Material Changes.....	2
Item 3 — Table of Contents.....	2
Item 4 — Advisory Business.....	2
Item 5 — Fees and Compensation.....	4
Item 6 — Performance-Based Fees and Side-By-Side Management.....	5
Item 7 — Types of Clients.....	5
Item 8 — Methods of Analysis, Investment Strategies and Risk of Loss.....	6
Item 9 — Disciplinary Information.....	16
Item 10 — Other Financial Industry Activities and Affiliations.....	17
Item 11 — Code of Ethics, Participation in Client Transactions and Personal Trading.....	18
Item 12 — Brokerage Practices.....	18
Item 13 — Review of Accounts.....	20
Item 14 — Client Referrals and Other Compensation.....	20
Item 15 — Custody.....	20
Item 16 — Investment Discretion.....	21
Item 17 — Voting Client Securities.....	21
Item 18 — Financial Information.....	21
Item 19 — Requirements for State-Registered Advisers.....	22

Item 4 — Advisory Business

Sonrise Opportunity Corporation is a Texas corporation founded in 2026 and has been in business since March 2026. The Firm's sole principal owner is David J. Roskoph, who owns 100% of the Firm and serves as its President and Chief Compliance Officer.

Wrap Fee Program

Sonrise Opportunity Corporation ("Sonrise Opportunity" or the "Firm") offers investment advisory services through a wrap fee program (the "Program"). A wrap fee program is an arrangement under which clients receive investment advisory services, including portfolio management or advice concerning the selection

of investment strategies, and the execution of client transactions for a specified fee or fees not based upon the number of transactions in their accounts. Clients in the Program pay a single, all-inclusive fee that covers both advisory services and trade execution costs through the designated custodian.

Because Sonrise Opportunity is the sponsor and portfolio manager of this wrap fee program, clients entering into the Program will receive our Wrap Fee Program Brochure (Form ADV Part 2A Appendix 1) in addition to this Firm Brochure. Clients should carefully review the Wrap Fee Program Brochure for complete information about the Program, including costs and whether the wrap fee structure is appropriate for their needs.

To participate in the Program, clients must open a securities brokerage account with Charles Schwab & Co., Inc. ("Schwab"), a FINRA-registered broker-dealer and member SIPC, or another broker-dealer approved by Sonrise Opportunity. Clients enter into a separate account agreement directly with Schwab.

Wrap Fee Account Management and Compensation

Sonrise Opportunity provides portfolio management services exclusively through the Program and does not manage any client accounts outside of the Program. Accordingly, there are no differences between how Sonrise Opportunity manages wrap fee accounts and how it manages other accounts, because all client accounts are wrap fee accounts managed under the Program in accordance with each client's investor profile and selected investment strategy.

Clients should understand that Sonrise Opportunity receives a portion of the wrap fee as compensation for the investment advisory and portfolio management services it provides under the Program. The balance of the wrap fee is applied to trade execution and related Program costs through the designated custodian, as described in Item 5 of this Brochure and in our Wrap Fee Program Brochure (Form ADV Part 2A Appendix 1).

Investor Profile and Suitability

At the onset of the Program, each client completes an investor profile describing their individual investment objectives, liquidity and cash flow needs, time horizon, risk tolerance, and any other factors pertinent to their specific financial situation. After analyzing the relevant information, Sonrise Opportunity assists each client in developing an appropriate investment strategy. The investor profile is reviewed no less than annually and updated whenever a client's circumstances change materially.

Model Portfolios

Sonrise Opportunity provides investment advisory services on a discretionary basis using three model portfolios (collectively, the "Portfolios"): the Moderate Portfolio, the Growth Portfolio, and the Opportunity Portfolio. Each Portfolio is a model allocation composed exclusively of no-load mutual funds. Each client's account is managed in accordance with one or more of the Portfolios, selected on the basis of the client's investor profile and risk tolerance.

The Portfolios are model portfolios only. They are not pooled investment vehicles, private funds, or separate legal entities of any kind. Sonrise Opportunity does not sponsor, operate, or provide investment advice to any private fund or pooled investment vehicle, and client assets are never commingled. Each client's assets are held in the client's own individual brokerage account at Schwab, titled in the client's name, and are invested in accordance with the selected Portfolio. Clients should be aware that, in addition to Sonrise Opportunity's advisory fee, the no-load mutual funds held in client accounts carry their own internal fees and expenses borne indirectly by investors, as described more fully in Item 5.

Retirement Plan Brokerage Window Accounts

Where an individual participant in an employer-sponsored retirement plan has access to a self-directed brokerage window custodied at Schwab (for example, the Schwab Personal Choice Retirement Account, or "PCRA"), Sonrise Opportunity may manage that participant's brokerage window account as part of the Program. In each case, the individual participant — not the plan or the plan sponsor — is the Firm's client, executes the Firm's Investment Advisory Agreement, completes an Investor Profile, and grants the Firm trading authority over the brokerage window account. Investment selection is limited to the alternatives available through the brokerage window, and the account is managed in accordance with the client's selected Portfolio to the extent available investments permit.

Sonrise Opportunity provides no advice or services to any plan, plan sponsor, or plan fiduciary. The Firm does not advise on plan participation, contribution or funding levels, contribution allocation among plan options outside the brokerage window, employer securities, or plan design, and does not provide pension consulting services. Brokerage window accounts are charged the Firm's standard Program fee schedule as described in Item 5; any fees or charges imposed by the plan, the plan's recordkeeper, or the brokerage window itself are separate from, and in addition to, the Program fee and are borne by the client.

Assets Under Management

As of the date of this Brochure, Sonrise Opportunity manages \$0 in client assets on a discretionary basis and \$0 in client assets on a non-discretionary basis, as the Firm has not yet commenced advisory operations pending completion of its registration. Upon commencement, all client assets will be managed on a discretionary basis, and the Firm will update its assets under management in its annual Form ADV Part 1A filings. Clients may contact us at (346) 840-4066 to obtain current information about our assets under management.

Item 5 — Fees and Compensation

Wrap Fee Schedule

On an annualized basis, our Program fees are as follows:

Assets Under Management	Annual Advisory 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

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

Retirement plan brokerage window accounts managed under the Program (see Item 4) are charged this same standard fee schedule; fees or charges imposed by the plan or the brokerage window are separate and are borne by the client.

⚠ Non-Assignment Clause — Required Notice (Texas TAC §116.12(c)) Sonrise Opportunity's advisory agreement contains a provision prohibiting the 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 be notified in writing of any proposed assignment and will be required to provide affirmative written consent before any such assignment becomes effective.

Underlying Mutual Fund Expenses

Clients should be aware that the no-load mutual funds held within the Program carry their own internal management fees, operating expenses, and other charges that are separate from and in addition to Sonrise Opportunity's advisory fee. These embedded costs are reflected in each fund's net asset value and are not separately charged to the client's account, but they do reduce investment returns. Clients should review each fund's prospectus or other disclosure documents for information about internal expenses.

Account Additions and Withdrawals

Clients may make additions to or withdrawals from their accounts at any time, subject to Sonrise Opportunity's right to terminate an account. Additions may be in cash or securities; however, Sonrise Opportunity reserves the right to liquidate any transferred securities or to decline to accept particular securities into a client's account. Clients may withdraw account assets upon written notice, subject to normal securities settlement procedures. Portfolios are designed as long-term investments, and withdrawal of assets may impair the achievement of a client's investment objectives.

Termination

This agreement may be terminated by either party at any time upon written notice. All fees will be prorated to the date of termination based on the number of calendar days elapsed, and any unearned portion of prepaid fees shall be promptly refunded to the client.

Item 6 — Performance-Based Fees and Side-By-Side Management

Sonrise Opportunity does not offer any advisory services under performance-based fee arrangements. We do not employ side-by-side management — that is, the simultaneous management of accounts that pay performance-based fees alongside accounts that do not.

Item 7 — Types of Clients

Sonrise Opportunity offers investment advisory services to the following types of clients:

- Individuals (including high-net-worth individuals)
- Trusts and estates

- Charitable organizations
- Corporations and other business entities

There is no minimum account size required to open an account with Sonrise Opportunity, although the Firm reserves the right to impose minimum account requirements in the future. Clients should contact the Firm directly to discuss any account minimums that may apply.

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

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. Traditional long-only investing exposes a portfolio to the full weight of every bear market, every sector rotation, and every geopolitical disruption. Sonrise Opportunity rejects that constraint. 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. No single market environment favors every asset class, and no adviser can predict with certainty which will lead or lag in any given period. 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 — from sustained bull markets to sharp corrections, from inflationary periods to deflationary ones, from dollar strength to dollar weakness.

The three Portfolios are differentiated primarily by the maximum level of volatility each is authorized to take relative to the S&P 500, as measured by standard deviation. These percentages are ceilings, not fixed targets: the Adviser retains discretion to manage any Portfolio at a lower level of risk when market, economic, or portfolio-specific conditions warrant, and a Portfolio's realized standard deviation will vary over time and may be materially below its stated maximum. The Moderate Portfolio is managed toward a standard deviation ceiling of up to approximately 60% of the S&P 500's standard deviation, the Growth Portfolio up to approximately 100%, and the Opportunity Portfolio up to approximately 150%. All three Portfolios pursue this objective using the same underlying approach — long and short positions across the same asset categories — differing primarily in the degree of risk each is authorized to take and, correspondingly, the extent to which each may employ leveraged mutual funds: the Moderate Portfolio does not use leveraged funds, the Growth Portfolio may use them in a limited capacity, and the Opportunity Portfolio may use them more extensively. 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. Because each Portfolio employs both long and short exposures, the nature of risk experienced within these portfolios differs qualitatively from a traditional long-only portfolio

of comparable measured volatility. Clients are encouraged to discuss these distinctions with the Firm before investing.

Holding Period Approach

The Moderate, Growth, and Opportunity Portfolios are not managed as trading portfolios; the Firm's exclusive use of no-load mutual funds reflects this long-term orientation. The Firm does not impose a fixed minimum or maximum holding period on any position in any Portfolio. The Firm forms a directional thesis based on its assessment of prevailing economic and market conditions, or on its assessment that a given asset category is trading above or below what the Firm views as its intrinsic value. For long positions, including leveraged long positions, the Firm does not anticipate a fixed resolution period; a position is held for as long as its thesis continues to be supported by conditions and the position remains within the Portfolio's risk parameters, with no expectation of exiting or rotating on any particular schedule. For inverse and short positions, the Firm generally anticipates shorter holding periods, because markets do not decline in a straight line -- even within a sustained downturn, meaningful counter-trend rallies are common, and the Firm reassesses an inverse or short thesis whenever one occurs. Inverse and short positions are accordingly reassessed more frequently, and are not expected, on average, to be held as long as the Firm's long positions. In every case, if the Firm's view proves incorrect, a position may be exited earlier, subject to any minimum-holding or short-term-redemption restriction imposed by the underlying fund itself. Separately, the Firm may change a position's size during a rebalancing event solely to manage risk exposure -- for example, trimming a position that has appreciated significantly in order to keep the Portfolio's overall risk within its target range -- even where the Firm's underlying thesis for that position remains intact and continues to perform as expected.

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 is managed toward a standard deviation ceiling of up to approximately 60% of that of the S&P 500, with discretion to run at a lower level of risk when conditions warrant. This does not mean the Portfolio avoids risk; rather, it means the Portfolio is managed to control risk through diversification, disciplined position sizing, and the deliberate inclusion of both long and short exposures across uncorrelated asset categories. The Moderate Portfolio does not employ leveraged mutual funds.

The Portfolio's use of both long and short positions is a defining characteristic of the strategy. Just as the Adviser may hold a long position in a mutual fund it believes is positioned to benefit from a rising asset category, the Adviser may hold a short-positioned or inverse mutual fund it believes is positioned to benefit from a declining asset category. In either case the objective is the same: to seek a return from the Adviser's view of that category's direction. A short-positioned or inverse fund held in the Moderate Portfolio is not used solely, or even primarily, to offset losses in a related long position elsewhere in the Portfolio — it is a direct, independent expression of the Adviser's view that a given asset category, or the broader market, is likely to decline, and it is intended to gain value in that scenario. Because these positions are held through mutual funds rather than direct short sales, a client's potential loss on any such position is limited to the amount invested in that fund, unlike a direct short sale, where loss is theoretically unlimited. In a rising market, however, a short-positioned or inverse fund will lose value — potentially

significantly — regardless of gains elsewhere in the Portfolio. During periods of significant market stress or heightened uncertainty, the Adviser may instead shift a portion or all of the Portfolio's assets into Money Market Funds, prioritizing capital preservation when the risk-reward environment appears unfavorable for either long or short positioning.

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," above
Cash Reserve Authority	May hold all or a portion in Money Market Funds

Investment Universe

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, and small-cap segments
- Global and international equity mutual funds — long and short positions across developed and emerging markets
- Fixed income mutual funds — long and short positions across U.S. government, corporate, and international bonds
- Sector mutual funds — long and short positions targeting specific industries and economic sectors
- Precious metals mutual funds — long and short positions in gold, silver, and platinum
- Energy mutual funds — long and short positions in oil, natural gas, and the broader energy sector
- Currency mutual funds — long and short positions in foreign exchange including major and emerging market currencies
- Cryptocurrency mutual funds — long and short positions in funds providing exposure to digital assets
- Money Market Funds — utilized for capital preservation during periods of elevated risk or portfolio repositioning

All investment decisions within the Moderate Portfolio are made at the discretion of Sonrise Opportunity's Managing Adviser in accordance with the investment guidelines described herein and the client's documented investor profile. No minimum or maximum holding period applies. The Adviser forms a directional thesis for each position and generally anticipates that thesis will resolve over approximately six to nine months, though the Adviser retains full discretion to exit a position earlier if its view changes, subject to any restriction imposed by the underlying fund, or to hold a position longer if the thesis continues to be supported by conditions.

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 is managed toward a standard deviation ceiling of up to approximately 100% of that of the S&P 500 — full equity-market-level volatility as its maximum, not a fixed target, with discretion to run at a lower level of risk when conditions warrant — but pursues that risk through a fundamentally different structure than a traditional index or long-only equity fund. By holding both long and short positions across a wide array of asset categories, the Portfolio seeks to capture gains from rising markets while directly seeking gains from declining ones through short and inverse positions. To pursue this mandate, the Portfolio may also employ leveraged mutual funds in a limited capacity, consistent with its risk ceiling.

Unlike a passive index fund, the Growth Portfolio does not simply accept whatever markets deliver. It positions actively across domestic and international equities, fixed income, sector strategies, currencies, precious metals, energy, and cryptocurrency mutual funds. Just as the Portfolio's long positions reflect the Adviser's conviction about areas of relative opportunity, its short and inverse positions reflect the Adviser's conviction that a given asset category is likely to decline, and are intended to gain value directly from that decline rather than solely to offset losses elsewhere in the Portfolio. Because these positions are held through mutual funds rather than direct short sales, a client's potential loss on any such position is limited to the amount invested in that fund, unlike a direct short sale, where loss is theoretically unlimited.

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. Clients should understand that the Portfolio may underperform a rising equity market in certain environments and that the use of short-positioned mutual funds introduces risks distinct from traditional equity investing.

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," above
Cash Reserve Authority	May hold all or a portion in Money Market Funds

Investment Universe

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 spanning developed markets, emerging markets, and single-country strategies
- Fixed income mutual funds — long and short positions across U.S. Treasuries, corporate bonds, high-yield, and international fixed income

- Sector mutual funds — long and short positions targeting leading and lagging industries across the economic cycle
- Cryptocurrency mutual funds — long and short positions in digital asset markets through regulated fund vehicles
- Precious metals mutual funds — long and short positions across gold, silver, platinum, and related mining strategies
- Energy mutual funds — long and short positions tied to oil, natural gas, and the broader energy complex
- Currency mutual funds — long and short positions across major and emerging market foreign exchange rates
- Money Market Funds — utilized for capital preservation during periods of elevated risk or portfolio repositioning

All investment decisions within the Growth Portfolio are made at the discretion of Sonrise Opportunity's Managing Adviser. No-load mutual funds are selected for their strategic alignment with the Portfolio's objectives, cost structure, and risk characteristics. No minimum or maximum holding period applies. Positions are managed on the same thesis-driven basis described for the Moderate Portfolio, above, subject to any minimum-holding or short-term-redemption restriction imposed by the underlying fund itself.

The Opportunity Portfolio

Maximum growth potential across all market environments

The Opportunity Portfolio is designed for investors who seek the highest level of growth potential available within the Sonrise Opportunity family of portfolios. The Portfolio is managed toward a standard deviation ceiling of up to approximately 150% of that of the S&P 500 — the highest maximum risk level within the Sonrise Opportunity family, and not a fixed target: the Adviser has discretion to manage the Portfolio at a materially lower level of risk when conditions warrant, and to increase risk toward the maximum when conditions, in the Adviser's judgment, favor doing so. Investors considering the Opportunity Portfolio must genuinely understand and accept that higher potential returns are accompanied by commensurately higher potential losses. This Portfolio is not appropriate for investors with short time horizons or limited risk capacity.

What distinguishes the Opportunity Portfolio is not simply its willingness to accept risk, but how it deploys that risk. The Portfolio holds both long and short positions simultaneously across the broadest possible opportunity set, including domestic equities, international equities, fixed income, sectors, currencies, cryptocurrency, energy, and precious metals. Just as the Portfolio's long positions seek to profit from areas of anticipated strength, its short and inverse positions seek to profit directly from areas of anticipated weakness — regardless of which markets are rising and falling at any given time — rather than serving solely as an offset to the Portfolio's long exposure. To pursue its risk ceiling, the Portfolio may employ leveraged mutual funds more extensively than the Moderate or Growth Portfolios, and may concentrate in categories that are inherently more volatile than the broad market. Because these positions are held through mutual funds rather than direct short sales, a client's potential loss on any individual position is limited to the amount invested in that fund, unlike a direct short sale, where loss is theoretically unlimited.

The Adviser seeks to manage the Portfolio's aggregate exposure, including any leveraged positions, so that estimated net risk remains within the stated ceiling; this assessment reflects the Adviser's reasonable, good-faith estimate and cannot guarantee that realized risk will not exceed that ceiling, particularly in stressed or fast-moving markets. 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.

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," above
Cash Reserve Authority	May hold all or a portion in Money Market Funds

Investment Universe

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

- Domestic equity mutual funds — aggressive long and short positioning across all market capitalizations and investment styles
- Global and international equity mutual funds — long and short exposure to developed markets, emerging markets, frontier markets, and single-country strategies
- Fixed income mutual funds — long and short positions across the full credit spectrum including U.S. government, corporate, high-yield, and international debt
- Sector mutual funds — concentrated long and short positions targeting specific industries, themes, and economic sectors with high conviction
- Cryptocurrency mutual funds — regulated fund vehicles providing meaningful exposure to digital asset markets and blockchain-related strategies
- Precious metals mutual funds — long and short positions in gold, silver, platinum, copper, and related resource strategies
- Energy mutual funds — long and short exposure to oil, natural gas, alternative energy, and the global energy complex
- Currency mutual funds — active long and short positions across major, minor, and emerging market currency pairs
- Money Market Funds — utilized for capital preservation during periods of elevated systemic risk or portfolio repositioning

All investment decisions within the Opportunity Portfolio are made at the sole discretion of Sonrise Opportunity's Managing Adviser in accordance with the client's documented investor profile and the investment guidelines set forth herein. No minimum or maximum holding period applies. Positions are managed on the same thesis-driven basis described for the Moderate Portfolio, above, subject to any minimum-holding or short-term-redemption restriction imposed by the underlying fund itself. The Adviser retains full discretion to reposition the Portfolio at any time in response to market or economic conditions.

Methods of Analysis

Cyclical Analysis: Statistical analysis of events occurring at predictable intervals extrapolated into the future, based on the premise that cyclical forces drive price movements in financial markets.

Fundamental Analysis: Analysis 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: Employs models and rules based on price and volume data, including 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 analysis addressing unquantifiable factors such as management expertise, industry cycles, and macroeconomic sentiment — the experiential dimension of investment judgment.

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. Markets periodically experience manias and panics driven by greed or fear. Identifying these extremes requires experienced judgment and presents potential opportunities on both the long and short side.

Material Risks of Each Method of Analysis

Each method of analysis described above involves material risks, and none can assure a profit or protect against loss. The material risks of each method include the following:

Cyclical Analysis Risk: Cyclical analysis assumes that patterns observed at historical intervals will repeat. Economic and market cycles vary in length, amplitude, and cause, and may shift, truncate, or fail to recur. A cycle identified in historical data may be coincidental rather than causal, and structural changes in markets, policy, or technology can render prior cycles unreliable, causing investment decisions based on an expected cycle to be mistimed or simply wrong.

Fundamental Analysis Risk: Fundamental analysis relies on financial, competitive, and economic data that may be inaccurate, incomplete, stale, or subject to revision. Even where the data and the resulting assessment are correct, market prices may fail to converge toward the assessed value for extended periods, or other market forces may overwhelm fundamentals, so a security or fund judged attractive on fundamentals may nonetheless decline.

Technical Analysis Risk: Technical analysis is based on historical price and volume data and assumes past trading patterns have predictive value. Patterns may be the product of randomness, may fail out of sample, or may cease to work once widely recognized. Technical signals can generate false or conflicting

indications and do not account for the underlying financial condition of an investment, which may cause poorly grounded entry and exit decisions.

Quantitative Analysis Risk: Quantitative analysis depends on models, algorithms, and datasets that may contain errors, embed flawed assumptions, or be trained on historical relationships that break down in changed market conditions (model risk). Apparent statistical relationships may be spurious, and over-reliance on model output without judgment can produce losses precisely in stressed markets where historical correlations fail.

Qualitative Analysis Risk: Qualitative analysis is inherently subjective. Judgments regarding factors such as management quality, industry dynamics, or business cycles depend on the analyst's experience, information access, and potential biases, cannot be verified statistically, and may prove incorrect. Two qualified analysts may reach opposite conclusions from the same information.

Sector Analysis Risk: Sector analysis concentrates attention, and potentially allocations, on particular industries or economic sectors. A sector expected to outperform may instead underperform due to regulatory change, technological disruption, demand shifts, or macroeconomic factors, and emphasis on fewer sectors reduces diversification, increasing the impact of an incorrect sector judgment on results.

Behavioral Analysis Risk: Behavioral analysis attempts to identify market extremes driven by investor emotion. Sentiment is difficult to measure, extremes can persist far longer than anticipated (markets can remain irrational for extended periods), and a perceived mania or panic may reflect fundamental change rather than emotion. Acting against prevailing sentiment — including through short-positioned funds — can produce significant losses if the identified extreme continues or was misdiagnosed.

Material Risks of Each Portfolio

Each Portfolio is an investment strategy with its own material risks, described below. All three Portfolios share certain structural risks: each holds both long and short positions across multiple asset categories (domestic and global equities, fixed income, sector strategies, currencies, cryptocurrency, energy, precious metals, and money market funds), with short and inverse positions used as a direct, independent expression of the Adviser's view that a category is likely to decline, not solely as an offset to long positions; each such position loses value when the referenced market rises; each manages toward a standard deviation ceiling that is a maximum, not a guarantee — realized volatility and losses may materially exceed the ceiling, particularly in stressed markets when historical correlations between asset categories break down; and the Growth and Opportunity Portfolios may employ leveraged mutual funds, which magnify both gains and losses. The Growth Portfolio involves significant risks, and the Opportunity Portfolio involves risks that are significant and, because of its greater use of leverage and its higher risk ceiling, more pronounced, as described below.

Moderate Portfolio Risks: Although the Moderate Portfolio is managed toward a standard deviation ceiling of up to approximately 60% of the S&P 500, it remains subject to meaningful risk of loss across every asset category it holds, including equity, fixed income, currency, commodity, and cryptocurrency exposure. Its short and inverse positions create opportunity-cost risk: the Portfolio may materially underperform in strongly rising markets, because those positions are designed to gain from decline and will lose value as markets rise, regardless of gains elsewhere in the Portfolio. The volatility ceiling is a

maximum, not a guarantee, and may be exceeded; in periods of market stress, diversification across categories may fail precisely when it is most needed.

Growth Portfolio Risks: The Growth Portfolio is managed toward a standard deviation ceiling of up to approximately 100% of the S&P 500 and therefore exposes clients to full equity-market-level volatility, including drawdowns comparable in depth and duration to broad equity bear markets. Because the Portfolio pursues that risk ceiling through combined long and short positions across nine asset categories, and may employ leveraged mutual funds in a limited capacity — rather than through a conventional long-only equity allocation — it carries additional risks a client may not expect at this volatility level: whipsaw risk, in which both long and short positions lose simultaneously in choppy or reversing markets; leverage risk; currency and emerging-markets risk; commodity and energy price risk; and cryptocurrency volatility. These risks are significant, and a client should be prepared for substantial fluctuation in account value.

Opportunity Portfolio Risks: The Opportunity Portfolio is managed toward a standard deviation ceiling of up to approximately 150% of the S&P 500 — the highest ceiling among the three Portfolios — and involves correspondingly elevated risk. Its amplified risk ceiling means losses can be substantially larger, more frequent, and longer-lasting than those of the broad equity market; a market decline may be experienced at roughly one and one-half times its magnitude. The Portfolio makes the most extensive use, among the three Portfolios, of short-positioned, inverse, and leveraged mutual funds: short and inverse exposure loses value in rising markets, and certain short, inverse, or leveraged mutual funds rebalance daily, so their returns over periods longer than one day can differ materially — and adversely — from the simple multiple of the referenced market, particularly in volatile conditions. The Portfolio may also hold elevated exposure to inherently volatile categories, including emerging markets, currencies, energy, precious metals, and cryptocurrency. In choppy or directionless markets, both long and short positions can lose value at the same time. The Opportunity Portfolio is suitable only for clients whose documented risk tolerance permits substantial fluctuation and potential loss, and the Firm requires the specific initialed risk acknowledgment described earlier in this Item before managing assets under this strategy.

Material Risks of Each Category of Mutual Fund

The Portfolios are constructed exclusively from no-load mutual funds. All mutual funds share certain risks: shares are priced once daily at net asset value; each fund bears its own internal fees and expenses in addition to the Firm's advisory fee; performance depends in part on the skill of the underlying fund's manager; and funds may impose redemption fees or restrictions on frequent trading that can constrain the timing of Portfolio changes. Mutual fund shares are not bank deposits and are not FDIC insured. In addition, each category of mutual fund used in the Portfolios involves its own material risks:

Single Asset-Type Concentration Risk: Because the Portfolios are constructed exclusively from one type of asset — registered open-end no-load mutual funds — every client account is fully exposed to the structural characteristics of that asset type: shares can be bought or sold only at the fund's once-daily net asset value, so the Firm cannot execute intra-day; underlying fund fees and expenses apply to substantially all assets, in addition to the Firm's advisory fee; fund-level events such as manager departures, redemption restrictions, capital gains distributions, or fund closures affect the entire account; and clients forgo potential benefits available through other security types, such as individual bonds held to maturity, individual equities, or exchange-traded funds. Diversification across fund categories does not eliminate this structural concentration in a single type of security.

Domestic Equity Funds (long and short): Subject to general equity market risk — the value of underlying stocks may decline due to economic, political, or issuer-specific developments. Mid-cap and small-cap funds are typically more volatile and less liquid than large-cap funds. Short-positioned domestic equity funds lose value when the referenced equity market rises.

Global and International Equity Funds (long and short): Subject to equity market risk plus currency risk (adverse exchange-rate movements can reduce returns even when local markets rise), political and economic instability, differing regulatory, accounting, and disclosure standards, and potentially lower liquidity. Emerging markets funds magnify each of these risks and can experience abrupt, severe declines.

Fixed Income Funds (long and short): Subject to interest rate risk (bond prices fall as rates rise, with longer-duration funds falling further), credit and default risk (particularly for corporate and lower-rated debt), inflation risk eroding real returns, and — for international bond funds — currency and sovereign risk. Short-positioned fixed income funds lose value when interest rates fall or bond prices rise.

Sector Funds (long and short): Concentrated in a single industry or economic sector and therefore lack diversification; an adverse regulatory change, technological disruption, or demand shift affecting that sector impacts the fund far more severely than a broad-market fund. Sector funds are typically more volatile than diversified equity funds.

Precious Metals Funds (long and short): Subject to sharp commodity price volatility driven by supply and demand, currency movements (particularly the U.S. dollar), central bank activity, and investor sentiment. Precious metals produce no income, and funds concentrated in mining companies add equity and operational risks on top of metal price risk.

Energy Funds (long and short): Subject to pronounced swings in oil, natural gas, and other energy prices driven by geopolitical events, OPEC and governmental policy, weather, and technological change, as well as regulatory and environmental risks affecting energy producers. Energy funds are among the more volatile sector categories.

Currency Funds (long and short): Subject to exchange-rate volatility driven by interest-rate differentials, monetary and fiscal policy, political developments, and government intervention, including currency controls and devaluations. Emerging market currency exposure can be extremely volatile and illiquid. Currency movements are notoriously difficult to predict and can reverse abruptly.

Cryptocurrency Funds: Involve significant and unusual risks. Cryptocurrency prices are extraordinarily volatile — far more than traditional asset classes — and are affected by evolving and uncertain regulation, technology and security failures, fraud and market manipulation, concentrated ownership, and shifting investor sentiment. A cryptocurrency-linked fund can lose a substantial portion of its value in a short period, and the asset class lacks the long performance history used to evaluate traditional investments.

Money Market Funds: Used for capital preservation, but not risk-free: money market funds are not FDIC insured, are not guaranteed, and although they seek to maintain a stable share price, it is possible to lose money. Yields may be lower than inflation, eroding purchasing power over time.

Short-Positioned and Inverse Mutual Funds: Used across all three Portfolios as a direct, independent expression of the Adviser's view that a given category is likely to decline — not solely to offset losses in a

related long position — and involving risks that may be less familiar to retail investors than a traditional long-only strategy. These funds are designed to gain when a referenced market falls and therefore lose value when that market rises — including in prolonged bull markets. Certain inverse funds rebalance daily; due to compounding, their returns over periods longer than one day can differ materially and adversely from the inverse of the referenced market's return over the same period, especially in volatile, directionless markets. These characteristics can cause outcomes that differ substantially from a client's intuitive expectations, which is why the Firm requires the specific risk acknowledgment described earlier in this Item.

Risk of Loss

⚠ 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.

Specific risks associated with Sonrise Opportunity's investment strategies include, but are not limited to:

- **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.
- **Leverage Risk:** The Growth Portfolio and, more extensively, the Opportunity Portfolio may hold mutual funds that seek to deliver a multiple of the return of an underlying index or asset category. Leverage magnifies both gains and losses, and daily-rebalanced leveraged funds can produce returns over periods longer than one day that differ materially from the simple multiple of the underlying index's return. The Moderate Portfolio does not employ leveraged funds.
- **Currency Risk:** Investments in currency-linked securities or international funds expose clients to fluctuations in foreign exchange rates.
- **Cryptocurrency Risk:** Mutual funds with exposure to digital assets are subject to high volatility, regulatory uncertainty, and rapidly evolving market structures.
- **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 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.
- **Manager Risk:** The performance of client accounts depends significantly on the investment judgment of Sonrise Opportunity's Managing Adviser.
- **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.

Client Risk Awareness and Acknowledgment

Before engaging any client in a Portfolio strategy — and in particular the Growth Portfolio and the Opportunity Portfolio, which target elevated volatility relative to the S&P 500 — Sonrise Opportunity takes specific, documented steps to ensure the client is aware of the risks associated with the selected strategy. First, each client completes a written Investor Profile documenting the client's investment

objectives, time horizon, and risk tolerance, and the Firm will not place a client in a Portfolio inconsistent with that profile. Second, each client receives this Brochure and the Wrap Fee Program Brochure, which describe the investment approach and specific risk factors of each Portfolio, at least 48 hours before entering into an advisory agreement. Third, before assets are managed under a selected Portfolio, the client signs a Portfolio Selection and Risk Acknowledgment form identifying the selected Portfolio(s) and specifically acknowledging the associated risks, including the elevated volatility and short-position risks applicable to the Growth Portfolio and the Opportunity Portfolio. Signed acknowledgments are retained in the Firm's books and records. In addition, the Firm's investment advisory agreement contains a general risk acknowledgment executed by every client. Sonrise Opportunity will never recommend the Growth Portfolio or the Opportunity Portfolio to a client whose Investor Profile reflects a conservative risk tolerance. Portfolio recommendations are limited to strategies consistent with each client's documented risk tolerance. For clients whose risk tolerance is below that of the Moderate Portfolio (which targets approximately 60% of the standard deviation of the S&P 500), the Firm may recommend a reduced allocation that pairs the Moderate Portfolio with a cash or money market position — for example, an allocation of approximately 50% cash and 50% Moderate Portfolio, targeting roughly 30% of the standard deviation of the S&P 500 — or, where no suitable allocation exists, the Firm will decline the engagement rather than place a client in an unsuitable strategy. Likewise, because the Firm invests client accounts exclusively in no-load mutual funds, the Firm will not engage a client whose profile indicates that investing exclusively in no-load mutual funds is not suitable for that client.

Item 9 — Disciplinary Information

The following disciplinary event involving the Firm's principal is disclosed because it may be material to a client's evaluation of the Firm and its management.

Washington Consent Order (2018). On December 11, 2018, the Washington Department of Financial Institutions, Securities Division entered a Consent Order (No. S-17-2209-18-CO01) with respect to Rennaisat Capital, Inc., a Washington-registered investment adviser formerly owned and operated by Mr. Roskoph, and Mr. Roskoph individually as its principal. The findings related to Rennaisat's obligations, as custodian, with respect to a single private fund it then managed, Horse Head LP: Rennaisat failed to maintain its minimum net worth requirement on certain occasions, failed to maintain its balance sheet in accordance with GAAP, and failed to deliver Horse Head LP's year-end audited financial statements within the required 120 days of fiscal year-end for 2015, 2016, and 2017. These findings did not concern any of Rennaisat's approximately 22 separately managed advisory accounts, and by March 2018 — before the Consent Order was entered — all investors had withdrawn from Horse Head LP and no securities remained in the fund. With respect to the 2016 statement, Rennaisat had elected, on the advice of legal counsel and with client consent, not to distribute the audited statement; the Securities Division determined that the audited financial statement requirement is a regulatory requirement that may not be waived by clients. The matter was resolved by consent, without a hearing and without any finding of client loss, misappropriation, breach of fiduciary duty, misrepresentation, or fraud. The minimum net worth requirement at issue arose under Washington law; Texas, where the Firm is registered, imposes no minimum capital or bonding requirement on investment advisers, though insolvency may independently be grounds for denial, revocation, or suspension of registration. Under the order, Rennaisat and Mr. Roskoph agreed to pay a fine of \$10,000 (of which \$9,000 was suspended contingent on future compliance) and costs of \$5,000 (of which \$4,500 was suspended); agreed that they may not serve as an officer, director, owner, manager, or general partner of any private offering made pursuant to the private offering exemption in 15 U.S.C. § 77d(a)(2); and agreed not to have custody of client funds or securities

for ten years from entry of the order (through December 11, 2028), except for the direct deduction of advisory fees in compliance with applicable rules.

Sonrise Opportunity's advisory program is designed in full conformity with these: the Firm does not sponsor, manage, or advise any private fund or pooled investment vehicle; the Firm does not take custody of client funds or securities; all client assets are held at Schwab, a qualified custodian, in accounts titled in each client's name; and the Firm's authority is limited to trading and, where authorized, the direct deduction of its advisory fee. A copy of the Consent Order is available from the Firm upon request and through public regulatory records (CRD).

Item 10 — Other Financial Industry Activities and Affiliations

David Roskoph, the principal of Sonrise Opportunity Corporation, is a licensed Life and Health Insurance representative in the State of Texas. In this capacity, he may recommend and receive normal and customary commissions from the sale of insurance products, including fixed indexed annuities, universal life insurance, whole life insurance, and long-term care insurance.

⚠ Conflict of Interest Disclosure — Insurance Commissions A potential conflict of interest would exist if Mr. Roskoph begins recommending insurance products and receiving customary commissions on their sale: that compensation would create a financial incentive to recommend insurance and annuity products based in part on the compensation received, rather than exclusively on the client's best interest. Mr. Roskoph is not currently engaged in insurance sales activity, consistent with his current Form U4 disclosure. To mitigate this conflict, Sonrise Opportunity is committed to acting in the best interest of its clients at all times and to disclosing all material conflicts of interest. Clients are under no obligation to purchase any insurance product through Mr. Roskoph and may obtain insurance products from any provider of their choosing.

Sonrise Opportunity has no other affiliations with broker-dealers, investment companies, banking or thrift institutions, accountants, attorneys, pension consultants, real estate brokers or dealers, or sponsors of limited partnerships that are required to be disclosed.

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

Sonrise Opportunity has adopted a written Code of Ethics (the "Code") applicable to all officers and employees of the Firm. The Code establishes standards of ethical and professional business conduct, sets forth each employee's fiduciary obligations to clients, and requires compliance with applicable federal and state securities laws and regulations. The Code addresses personal securities trading, material non-public information, political contributions, gifts and entertainment, and electronic communications.

Sonrise Opportunity will provide a copy of its Code of Ethics to any client or prospective client upon request. Please contact us at (346) 840-4066 to request a copy. Our Firm and its employees may buy or sell for their own accounts securities that are also held or being considered for client accounts. These

personal trading activities are governed by the Code and are subject to preclearance, reporting, and other requirements designed to prevent conflicts of interest and ensure that client interests are placed first.

Material Financial Interest in Recommended Securities (Item 11.B): Neither Sonrise Opportunity nor any related person has any material financial interest in any security that the Firm recommends to clients or buys or sells for client accounts. The Firm does not act as principal in client transactions, does not act as general partner of any partnership in which clients are solicited to invest, and does not act as an investment adviser to any investment company recommended to clients. Accordingly, Item 11.B is not applicable.

Personal Trading in the Same Securities (Item 11.D): Mr. Roskoph and other supervised persons may buy or sell for their own accounts the same no-load mutual funds that the Firm recommends to, or buys or sells for, client accounts, and may do so at or about the same time. This practice presents a potential conflict of interest, because a person trading for their own account could seek to benefit from client trading activity. In the Firm's case, this conflict is substantially mitigated by the nature of the securities involved: open-end mutual fund shares are bought and sold at the fund's net asset value calculated once per day, so personal orders and client orders placed on the same day receive the same price, and personal trading cannot obtain a price advantage from, or ahead of, client transactions. In addition, the Code of Ethics subjects personal trading to preclearance and reporting requirements and requires that client interests be placed first at all times.

Item 12 — Brokerage Practices

Sonrise Opportunity recommends that clients use Charles Schwab & Co., Inc. ("Schwab") as their custodian and broker-dealer. Schwab is a FINRA-registered broker-dealer and member SIPC. Sonrise Opportunity is independently owned and operated and is not affiliated with Schwab. Clients are not required to use Schwab, but if a client elects to use a different custodian, Sonrise Opportunity may be unable to provide the full range of services described in this brochure or may be required to charge additional fees.

Clients open their Schwab accounts directly by entering into a separate account agreement with Schwab. Sonrise Opportunity does not open client accounts on behalf of clients. Although Sonrise Opportunity recommends Schwab as custodian, the Firm retains the ability to use other broker-dealers to execute trades when doing so is in the client's best interest.

Factors Considered in Recommending Schwab

In selecting and recommending Schwab as broker-dealer and qualified custodian, and in determining the reasonableness of Schwab's compensation, Sonrise Opportunity considers a range of factors, including: the breadth of no-load mutual funds available on Schwab's platform, including the long- and short-positioned funds used in the Portfolios; commission rates, transaction charges, and other costs borne by clients, and how those costs compare with those of other custodians offering comparable services; quality, speed, and accuracy of trade execution; financial strength, stability, and reputation; SIPC membership and the scope of additional asset protection; quality of custody services, including accuracy of statements, tax reporting, and transfer processing; technology, trading platforms, and account access

provided to clients and to the Firm; availability of a self-directed brokerage window (PCRA) for retirement plan participants; and responsiveness and quality of service and operational support. The Firm periodically evaluates these factors to confirm that its recommendation of Schwab and the compensation Schwab receives remain reasonable in relation to the value of the brokerage and custody services provided. Best execution is measured by the totality of these factors, not by cost alone.

Research and Other Soft Dollar Benefits (Item 12.A.1)

Sonrise Opportunity does not have any soft dollar arrangements and does not receive research or other products or services from any broker-dealer or third party in connection with client securities transactions. The Firm notes that Schwab makes certain services available to all independent advisers whose clients custody assets at Schwab — such as trading platforms, duplicate statements, and back-office support — that are not contingent on any volume of transactions and are common to institutional custody platforms generally. The availability of these services may nonetheless create an incentive for the Firm to recommend Schwab, which is a conflict of interest; the Firm addresses this conflict through the best-execution review described above.

Brokerage for Client Referrals (Item 12.A.2)

Sonrise Opportunity does not receive client referrals from Schwab or from any other broker-dealer or third party, and does not consider client referrals in selecting or recommending broker-dealers.

Directed Brokerage (Item 12.A.3)

Because Sonrise Opportunity recommends that all client accounts be maintained at Schwab, the Firm is deemed to recommend directed brokerage. Not all advisers require or recommend that clients use a particular broker-dealer. By using Schwab, clients may be unable to achieve the most favorable execution available elsewhere for a particular transaction, and this practice may cost clients more money in some circumstances. Because the Portfolios trade no-load mutual funds within Schwab's platform, the Firm believes any such effect is limited, and the Firm believes the aggregate benefits of the Schwab platform — including fund availability, custody quality, and cost — support its recommendation. Clients who direct the Firm to use a different broker-dealer should understand that the Firm may be unable to manage the account through the Program, may be unable to aggregate the client's orders with those of other clients, and that the client may pay higher costs as a result.

Aggregation of Orders

When Sonrise Opportunity determines that the purchase or sale of a security is appropriate for more than one client account, the Firm may aggregate orders for multiple accounts to facilitate best execution, including the negotiation of more favorable pricing or more timely execution. Any securities acquired through a blocked trade will be allocated among participating accounts in a fair and equitable manner consistent with each account's investment objectives and the Firm's policies.

Item 13 — Review of Accounts

Sonrise Opportunity reviews client accounts on an ongoing basis. The Managing Adviser 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 Adviser meets with each client on a semi-annual basis, in person or via teleconference.

In addition to Sonrise Opportunity's account statements, clients receive account confirmations and statements directly from Schwab at least quarterly. Clients are encouraged to compare these statements and to contact us promptly with any questions or discrepancies.

Item 14 — Client Referrals and Other Compensation

Sonrise Opportunity does not compensate any person or firm — including promoters, solicitors, or other third parties — for client referrals, and does not receive compensation for referring clients to others. Sonrise Opportunity does not receive any economic benefit from any third party in connection with providing investment advice to clients. Item 10 of this Brochure separately addresses the conflict of interest that would arise from Mr. Roskoph's insurance licensure if that activity becomes active in the future.

Item 15 — Custody

Sonrise Opportunity does not maintain physical custody of client assets. Client assets are maintained by Schwab (or such other qualified custodian as the client may select). However, Sonrise Opportunity is deemed to have constructive custody of client assets because it has the authority to deduct advisory fees directly from client accounts. All clients receive account statements directly from their qualified custodian at least quarterly. Clients are strongly encouraged to carefully review these statements and compare them with any account statements received from Sonrise Opportunity. Questions about account balances, positions, or fees should be directed to us at (346) 840-4066.

Item 16 — Investment Discretion

Sonrise Opportunity's wrap fee Program is managed on a fully discretionary basis. We place trades in a client's account without contacting the client prior to each trade. Our discretionary authority includes the ability to determine, without prior client approval, which securities to buy or sell and the amount of each security to buy or sell. Clients grant Sonrise Opportunity discretionary authority by executing a discretionary investment advisory agreement. Clients may impose restrictions on our discretionary authority by providing written instructions specifying any securities, sectors, or types of investments to be avoided, and may amend these restrictions at any time in writing.

Item 17 — Voting Client Securities

As a matter of firm policy, Sonrise Opportunity does not have authority to vote proxies on behalf of advisory clients. Clients retain full responsibility for receiving and voting proxies for all securities held in their accounts. Proxy materials will be sent directly to clients by the issuer or their custodian. Sonrise Opportunity may provide general information to clients regarding the voting of proxies upon request but does not make voting recommendations or exercise voting authority on behalf of any client. Sonrise Opportunity will not render advice or take action with respect to any legal proceedings involving securities held in client accounts.

Item 18 — 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, we are not required to include a balance sheet with this brochure under Item 18 of Form ADV Part 2A. Sonrise Opportunity has no financial condition, commitment, or liability that is reasonably likely to impair our ability to meet our contractual or fiduciary obligations to clients. Sonrise Opportunity has never been the subject of a bankruptcy proceeding.

Privacy Policy

Sonrise Opportunity is committed to protecting the privacy of its clients. We do not sell personal client information to third parties. We share personal information with third parties only as necessary to provide clients with the products or services they request, to administer client accounts, or as required by applicable law. The types of personal information we collect may include information provided on applications and forms, information about client transactions, and information received from custodians and other financial institutions.

We maintain physical, electronic, and procedural safeguards designed to protect client information from unauthorized access or disclosure. We will continue to protect client personal information even after the client relationship has ended. Clients who have questions about our privacy practices may contact us at (346) 840-4066.

Item 19 — Requirements for State-Registered Advisers

A. Principal Executive Officers and Management Persons

The sole principal executive officer and management person of Sonrise Opportunity Corporation is David J. Roskoph, MBA, Owner, President, and Chief Compliance Officer. Mr. Roskoph holds a BA in Liberal Arts from Cleveland State University (1982), an MBA from City University (1998), and an MBA — Advanced Studies from City University (2000). He has more than thirty-three years of experience in financial services, securities, and investment management, from 1987 through his retirement from Rennaisat Capital, Inc. in December 2020, including as CEO of Rennaisat Capital, Inc. (1997–2020) and its affiliated private fund, Horse Head LP (2008–2018), as CEO of Total Asset Management (1994–1997),

and in prior roles in financial sales, options trading, and securities brokerage, including service as a broker, general securities principal, and financial operations principal. Mr. Roskoph subsequently retired from active practice from December 2020 until founding Sonrise Opportunity in March 2026. His complete educational background and business experience are set forth in the accompanying Brochure Supplement (Form ADV Part 2B).

B. Other Business Activities of Management Persons

Mr. Roskoph holds a Life and Health Insurance license in the State of Texas and may, in the future, assist clients with the purchase of certain insurance products, including fixed indexed annuities, universal life insurance, whole life insurance, and long-term care insurance, for which he would receive normal and customary insurance commissions. 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, it would present a conflict of interest, as disclosed in Item 10 of this Brochure and in the Brochure Supplement; clients are under no obligation to purchase any insurance product through Mr. Roskoph. If activated, this activity is expected to occupy a minority of Mr. Roskoph's professional time. In addition, Mr. Roskoph is engaged in the following non-investment-related activities: he works part-time as a personal trainer, predominantly outside of securities market hours; and he has developed two completed proprietary systems — a children's music-learning system and a deep-sleep enhancement system — which are in maintenance status and require only incidental time. None of these activities involves investment advice, securities, or client assets, and collectively they are not expected to interfere with Mr. Roskoph's responsibilities to advisory clients. Neither the Firm nor Mr. Roskoph is actively engaged in any other business.

C. Performance-Based Fees

Neither Sonrise Opportunity nor any of its supervised persons is compensated with performance-based fees. As stated in Item 6 of this Brochure, the Firm charges only the asset-based wrap fee described in Item 5. No portion of the Firm's compensation is based on a share of capital gains on, or capital appreciation of, client assets.

D. Disciplinary Events

Neither Sonrise Opportunity nor any of its management persons has been found liable in any arbitration claim. With respect to administrative proceedings, in 2018 the Washington Department of Financial Institutions, Securities Division entered a Consent Order involving Mr. Roskoph and his former advisory firm, Rennaisat Capital, Inc., relating to net worth, GAAP balance sheet, and private fund audited financial statement delivery requirements. The material facts of that order, including its sanctions and ongoing undertakings, are disclosed in Item 9 of this Brochure. There are no other events to report under Item 19.D.

E. Relationships with Issuers of Securities

Neither Sonrise Opportunity nor any of its management persons has any relationship or arrangement with any issuer of securities.