

Item 1 Cover Page

**FORM ADV PART 2A  
DISCLOSURE BROCHURE**

**Omega Advisory LLC**

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This brochure provides information about the qualifications and business practices of Omega Advisory LLC. Being registered as a registered investment adviser does not imply a certain level of skill or training. If you have any questions about the contents of this brochure, please contact us at 770-361-3034. 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 Omega Advisory LLC (CRD #287459) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

**FEBRUARY 24,  
2025**

## Item 2: Material Changes

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### **Annual Update**

The Material Changes section of this brochure will be updated annually or when material changes occur since the previous release of the Firm Brochure.

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### **Material Changes since the Last Update**

This update is in accordance with the required annual update for Registered Investment Advisors. Since the last filing of this brochure on January 23, 2024, the following has been updated:

- Item 4 has been updated to disclose the most recent calculation for assets under management.
  - Item 7 account minimums updated.
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### **Full Brochure Available**

This Firm Brochure being delivered is the complete brochure for the Firm.

## Item 3: Table of Contents

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## Item 4: Advisory Business

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### **Firm Description**

Omega Advisory LLC, ("Omega") was founded in January 2017. Srikanth Madineni is 100% owner.

Omega is a fee based financial planning and investment advisory firm. The firm does not sell annuities, insurance, or other commissioned products.

An evaluation of each client's initial situation is provided to the client, often in the form of a net worth statement, risk analysis, similar document or conversation. Periodic reviews are also communicated to provide reminders of the specific courses of action that need to be taken. More frequent reviews occur but are not necessarily communicated to the client unless immediate changes are recommended.

Other professionals (e.g., lawyers, accountants, tax preparers, insurance agents, etc.) are engaged directly by the client on an as-needed basis and may charge fees of their own. Conflicts of interest will be disclosed to the client in the event they should occur. Under CCR Section 260.238(k), Omega, its representatives or any of its employees will disclose to the clients all material conflicts of interest.

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### **Types of Advisory Services**

Omega furnishes financial planning and investment advice through consultations.

#### **ASSET MANAGEMENT**

Omega offers discretionary and non-discretionary direct asset management services to advisory clients. Omega will offer clients ongoing portfolio management services through determining individual investment goals, time horizons, objectives, and risk tolerance. Investment strategies, investment selection, asset allocation, portfolio monitoring and the overall investment program will be based on the above factors.

##### **Discretionary**

When the client provides Omega discretionary authority the client will sign a limited trading authorization or equivalent. Omega will have the authority to execute transactions in the account without seeking client approval on each transaction.

##### **Non-discretionary**

When the client elects to use Omega on a non-discretionary basis, Omega will determine the securities to be bought or sold and the amount of the securities to be bought or sold. However, Omega will obtain prior client approval on each and every transaction before executing any transactions.

#### **FINANCIAL PLANNING AND CONSULTING**

If financial planning services are applicable, the client will compensate Omega on an hourly rate as described in detail under "Fees and Compensation" section of this brochure. Services include but are not limited to a thorough review of all applicable topics including; Investments, Taxes, Qualified Plans, Retirement Income, and College Planning. If a conflict of interest exists between the interests of the investment advisor and the interests of the client, the client is under no obligation to act upon the investment advisor's recommendation. If the client elects to act on any of the recommendations, the client is under no obligation to effect the transaction through Omega. Financial plans will be completed inside of sixty (60) days from the time the client has provided all the required documents and/or information. Under

CCR Section 260.235.2, it requires that the conflict of interest, which exists between the interests of the investment advisor and the interests of the client when offering financial planning services, be disclosed.

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**Client Tailored Services and Client Imposed Restrictions**

The goals and objectives for each client are documented in our client files. Investment strategies are created that reflect the stated goals and objectives. Clients may impose restrictions on investing in certain securities or types of securities. Clients are not limited to the types of restrictions that they may put on investments. Restrictions and limitations will be documented in the client file.

Agreements may not be assigned without written client consent.

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**Wrap Fee Programs**

Omega does not sponsor any wrap fee programs.

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**Client Assets under Management**

Omega has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$95,018,450	\$0	December 31, 2024

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**Item 5: Fees and Compensation**

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**Method of Compensation and Fee Schedule**

Omega bases its fees on a percentage of assets under management and hourly fees.

**ASSET MANAGEMENT**

Omega offers discretionary and non-discretionary direct asset management services to advisory clients. Pursuant to CCR Section 260.238(j), lower fees for comparable services may be available from other sources. Total fees to Client will never exceed the safe harbor threshold of 3% of assets under management per year. The fees for these services will be based on a percentage of Assets Under Management as follows:

Assets Under Management	Annual Fee	Quarterly Fee
Up to \$1,000,000	1.00%	0.25%
\$1,000,001-\$2,000,000	0.95%	0.2375%
\$2,000,001 - \$3,000,000	0.90%	0.225%
\$3,000,001 - \$4,000,000	0.85%	0.2125%
\$4,000,001-\$5,000,000	0.80%	0.20%
Over \$5,000,000	0.75%	0.1875%

This is a flat fee/breakpoint fee schedule, the entire portfolio is charged the same asset management fee. For example, a Client with \$1,500,000 under management would pay \$14,250 on an annual basis.  $\$1,500,000 \times 0.95\% = \$14,250$ .

The annual fee may be negotiable. Fees are billed quarterly in arrears based on the amount of assets managed as of the close of the last business of each quarter. Quarterly advisory fees deducted from the clients' account by the custodian will be reflected in a provided statement from the custodian. Lower fees for comparable services may be available from other sources. Clients may terminate their account within five (5) business days of signing the Investment Advisory Agreement for a full refund. Clients may terminate advisory services with thirty (30) days written notice. Omega will be entitled to a pro rata fee for the days service was provided in the final quarter. Client shall be given thirty (30) days prior written notice of any increase in fees, and client will acknowledge, in writing, any agreement of increase in said fees.

#### **FINANCIAL PLANNING SERVICES**

Financial plans are based on an hourly fee at a rate of \$120 per hour, priced according to the degree of complexity associated with the client's situation. Prior to the planning process the client is provided an estimated plan fee. The payment is due upon delivery of the plan. Financial Planning fees are negotiable and Omega reserves the right to waive the financial planning fee if plan is implemented with Omega. Client may cancel within five (5) days of signing Agreement with no obligation. If the client cancels after five (5) days, any earned, unpaid fees will be due to Omega based on the percentage of work completed based on the hourly rate.

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#### **Client Payment of Fees**

Investment management fees are billed quarterly in arrears, meaning that we charge you at the end of the three-month billing period. Fees are usually deducted from a designated client account to facilitate billing. The client must consent in advance to direct debiting of their investment account.

Financial planning services fees are due upon delivery of the plan.

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#### **Additional Client Fees Charged**

Custodians may charge transaction fees on purchases or sales of certain mutual funds, stocks, equities, and exchange-traded funds. These charges may include Mutual Fund transactions fees, postage and handling and miscellaneous fees.

Omega, in its sole discretion, may waive its minimum fee and/or charge a lesser investment advisory fee based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with clients, etc.).

For more details on the brokerage practices, see Item 12 of this brochure.

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#### **Prepayment of Client Fees**

Omega does not require any prepayment of fees.

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#### **External Compensation for the Sale of Securities to Clients**

Omega does not receive any external compensation for the sale of securities to clients, nor do any of the investment advisor representatives of Omega.



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

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### **Sharing of Capital Gains**

Fees are not based on a share of the capital gains or capital appreciation of managed securities.

Omega does not use a performance-based fee structure because of the conflict of interest. Performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client.

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

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### **Description**

Omega generally provides investment advice to individuals and high net worth individuals.

Client relationships vary in scope and length of service.

### **Account Minimums**

Omega requires a minimum of \$250,000 to open an account, but reserves the right to accept accounts with lesser assets at Omega's discretion.

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

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### **Methods of Analysis**

Security analysis methods may include fundamental analysis, technical analysis, and cyclical analysis. Investing in securities involves risk of loss that clients should be prepared to bear. Past performance is not a guarantee of future returns.

Fundamental analysis involves evaluating a stock using real data such as company revenues, earnings, return on equity, and profits margins to determine underlying value and potential growth. Technical analysis involves evaluating securities based on past prices and volume. Cyclical analysis involves analyzing the cycles of the market. Omega will specifically look to invest in assets that are undervalued and in most circumstances will focus on long term purchases.

When creating a financial plan, Omega utilizes fundamental analysis to provide review of insurance policies for economic value and income replacement. Technical analysis is used to review mutual funds and individual stocks. The main sources of information include Morningstar, client documents such as tax returns and insurance policies.

In developing a financial plan for a client, Omega's analysis may include cash flow analysis, investment planning, risk management, tax planning and estate planning. Based on the information gathered, a detailed strategy is tailored to the client's specific situation.

The main sources of information include financial newspapers and magazines, research materials prepared by others, corporate rating services, annual reports, prospectuses, and filings with the Securities and Exchange Commission.

### **Investment Strategy**

The investment strategy for a specific client is based upon the objectives stated by the client during consultations. The client may change these objectives at any time. Each client executes

a client profile form or similar form that documents their objectives and their desired investment strategy.

Other strategies may include long-term purchases, short-term purchases, and trading.

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### **Security Specific Material Risks**

All investment programs have certain risks that are borne by the investor. Fundamental analysis may involve interest rate risk, market risk, business risk, and financial risk. Risks involved in technical analysis are inflation risk, reinvestment risk, and market risk. Cyclical analysis involves inflation risk, market risk, and currency risk.

Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks and should discuss these risks with Omega:

- *Interest-rate Risk:* Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- *Market Risk:* The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- *Inflation Risk:* When any type of inflation is present, a dollar today will buy more than a dollar next year, because purchasing power is eroding at the rate of inflation.
- *Currency Risk:* Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- *Reinvestment Risk:* This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- *Business Risk:* These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- *Liquidity Risk:* Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- *Financial Risk:* Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.
- *Long-term purchases:* Long-term investments are those vehicles purchased with the intention of being held for more than one year. Typically the expectation of the investment is to increase in value so that it can eventually be sold for a profit. In

addition, there may be an expectation for the investment to provide income. One of the biggest risks associated with long-term investments is volatility, the fluctuations in the financial markets that can cause investments to lose value.

- *Short-term purchases:* Short-term investments are typically held for one year or less. Generally there is not a high expectation for a return or an increase in value. Typically, short-term investments are purchased for the relatively greater degree of principal protection they are designed to provide. Short-term investment vehicles may be subject to purchasing power risk — the risk that your investment’s return will not keep up with inflation.
- *Trading risk:* Investing involves risk, including possible loss of principal. There is no assurance that the investment objective of any fund or investment will be achieved.

## **Item 9: Disciplinary Information**

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### **Criminal or Civil Actions**

The firm and its management have not been involved in any criminal or civil action.

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### **Administrative Enforcement Proceedings**

The firm and its management have not been involved in administrative enforcement proceedings.

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### **Self-Regulatory Organization Enforcement Proceedings**

The firm and its management have not been involved in legal or disciplinary events related to past or present investment clients.

## **Item 10: Other Financial Industry Activities and Affiliations**

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### **Broker-Dealer or Representative Registration**

Omega has no representatives or employees who are registered representatives of a broker dealer.

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### **Futures or Commodity Registration**

Neither Omega nor its employees are registered or have an application pending to register as a futures commission merchant, commodity pool operator, or a commodity trading advisor.

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### **Material Relationships Maintained by this Advisory Business and Conflicts of Interest**

Neither Omega nor its employees have a material relationship to disclose.

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### **Recommendations or Selections of Other Investment Advisors and Conflicts of Interest**

Omega does not recommend other investment advisors.

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

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### **Code of Ethics Description**

The employees of Omega have committed to a Code of Ethics (“Code”). The purpose of our Code is to set forth standards of conduct expected of Omega employees and addresses

conflicts that may arise. The Code defines acceptable behavior for employees of Omega. The Code reflects Omega and its supervised persons' responsibility to act in the best interest of their client.

One area the Code addresses is when employees buy or sell securities for their personal accounts and how to mitigate any conflict of interest with our clients. We do not allow any employees to use non-public material information for their personal profit or to use internal research for their personal benefit in conflict with the benefit to our clients.

Omega's policy prohibits any person from acting upon or otherwise misusing non-public or inside information. No advisory representative or other employee, officer or director of Omega may recommend any transaction in a security or its derivative to advisory clients or engage in personal securities transactions for a security or its derivatives if the advisory representative possesses material, non-public information regarding the security.

Omega's Code is based on the guiding principle that the interests of the client are our top priority. Omega's officers, directors, advisors, and other employees have a fiduciary duty to our clients and must diligently perform that duty to maintain the complete trust and confidence of our clients. When a conflict arises, it is our obligation to put the client's interests over the interests of either employees or the company.

The Code applies to "access" persons. "Access" persons are employees who have access to non-public information regarding any clients' purchase or sale of securities, or non-public information regarding the portfolio holdings of any reportable fund, who are involved in making securities recommendations to clients, or who have access to such recommendations that are non-public.

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

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### **Investment Recommendations Involving a Material Financial Interest and Conflict of Interest**

Omega and its employees do not recommend securities to clients in which we have a material financial interest.

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### **Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest**

Omega and its employees may buy or sell securities that are also held by clients. In order to mitigate conflicts of interest such as front running, employees are required to disclose all reportable securities transactions as well as provide Omega with copies of their brokerage statements.

The Chief Compliance Officer of Omega is Srikanth Madineni. He reviews all employee trades each quarter. The personal trading reviews ensure that the personal trading of employees does not affect the markets and that clients of the firm receive preferential treatment over employee transactions

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### **Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest**

Omega does not maintain a firm proprietary trading account and does not have a material financial interest in any securities being recommended and therefore no conflicts of interest exist. However, employees may buy or sell securities at the same time they buy or sell

securities for clients. In order to mitigate conflicts of interest such as front running, employees are required to disclose all reportable securities transactions as well as provide Omega with copies of their brokerage statements.

The Chief Compliance Officer of Omega is Srikanth Madineni. He reviews all employee trades each quarter. The personal trading reviews ensure that the personal trading of employees does not affect the markets and that clients of the firm receive preferential treatment over employee transactions.

## **Item 12: Brokerage Practices**

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### **Factors Used to Select Broker-Dealers for Client Transactions**

Omega may recommend the use of a particular broker-dealer such as Charles Schwab or may utilize a broker-dealer of the client's choosing. Omega will select appropriate brokers based on a number of factors including but not limited to their relatively low transaction fees and reporting ability. Omega relies on its broker to provide its execution services at the best prices available. Lower fees for comparable services may be available from other sources. Clients pay for any and all custodial fees in addition to the advisory fee charged by Omega.

- *Directed Brokerage*

In circumstances where a client directs Omega to use a certain broker-dealer, Omega still has a fiduciary duty to its clients. The following may apply with Directed Brokerage: Omega's inability to negotiate commissions, to obtain volume discounts, there may be a disparity in commission charges among clients, and conflicts of interest arising from brokerage firm referrals.

- *Best Execution*

Investment advisors who manage or supervise client portfolios have a fiduciary obligation of best execution. The determination of what may constitute best execution and price in the execution of a securities transaction by a broker involves a number of considerations and is subjective. Factors affecting brokerage selection include the overall direct net economic result to the portfolios, the efficiency with which the transaction is effected, the ability to effect the transaction where a large block is involved, the operational facilities of the broker-dealer, the value of an ongoing relationship with such broker and the financial strength and stability of the broker. The firm does not receive any portion of the trading fees.

- *Soft Dollar Arrangements*

Omega does not have any soft dollar arrangements.

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### **Aggregating Securities Transactions for Client Accounts**

Omega is authorized in its discretion to aggregate purchases and sales and other transactions made for the account with purchases and sales and transactions in the same securities for other Clients of Omega. All clients participating in the aggregated order shall receive an average share price with all other transaction costs shared on a pro-rated basis.

## Item 13: Review of Accounts

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### **Schedule for Periodic Review of Client Accounts or Financial Plans and Advisory Persons Involved**

Account reviews are performed quarterly by Srikanth Madineni, Chief Compliance Officer. Account reviews are performed more frequently when market conditions dictate.

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### **Review of Client Accounts on Non-Periodic Basis**

Other conditions that may trigger a review of clients' accounts are changes in the tax laws, new investment information, and changes in a client's own situation.

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### **Content of Client Provided Reports and Frequency**

Clients receive written account statements no less than quarterly for managed accounts. Account statements are issued by the Custodian at which the client's account is held. Client receives confirmations of each transaction in account from Custodian and an additional statement during any month in which a transaction occurs.

## Item 14: Client Referrals and Other Compensation

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### **Economic benefits provided to the Advisory Firm from External Sources and Conflicts of Interest**

Omega does not receive economic benefits from external sources.

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### **Advisory Firm Payments for Client Referrals**

Omega does not compensate for client referrals.

## Item 15: Custody

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### **Account Statements**

All assets are held at qualified custodians, which means the custodians provide account statements directly to clients at their address of record at least quarterly. Clients are urged to review their account statements received directly from their custodians.

Omega is deemed to have constructive custody solely because advisory fees are directly deducted from client's account by the custodian on behalf of Omega. Pursuant to CCR Section 260.237(b)(3).

A. The investment adviser has custody of the funds and securities solely as a consequence of its authority to make withdrawals from client accounts to pay its advisory fee.

B. The investment adviser has written authorization from the client to deduct advisory fees from the account held with the qualified custodian.

C. Each time a fee is directly deducted from a client account, the investment adviser concurrently:

- i. Sends the qualified custodian an invoice or statement of the amount of the fee to be deducted from the client's account; and

ii. Sends the client an invoice or statement itemizing the fee. Itemization includes the formula used to calculate the fee, the value of the assets under management on which the fee is based, and the time period covered by the fee.

D. The investment adviser notifies the Commissioner in writing that the investment adviser intends to use the safeguards provided in this paragraph (b)(3). Such notification is required to be given on Form ADV.

## **Item 16: Investment Discretion**

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### **Discretionary Authority for Trading**

Omega may accept discretionary authority to manage securities accounts on behalf of clients. Omega has the authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. The client will authorize Omega discretionary authority to execute selected investment program transactions as stated within the Investment Advisory Agreement.

Clients may impose restrictions on investing in certain securities or types of securities. Clients are not limited to the types of restrictions that they may put on investments. Restrictions and limitations will be documented in the client file. However, Omega will consult with the client prior to each trade to obtain concurrence if a blanket trading authorization has not been given.

The client approves the custodian to be used and the commission rates paid to the custodian. Omega does not receive any portion of the transaction fees or commissions paid by the client to the custodian on certain trades.

## **Item 17: Voting Client Securities**

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### **Proxy Votes**

Omega does not vote proxies on securities. Clients are expected to vote their own proxies. The client will receive their proxies directly from the custodian of their account or from a transfer agent.

When assistance on voting proxies is requested, Omega will provide recommendations to the client. If a conflict of interest exists, it will be disclosed to the client.

## **Item 18: Financial Information**

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### **Balance Sheet**

A balance sheet is not required to be provided because Omega does not serve as a custodian for client funds or securities and Omega does not require prepayment of fees of more than \$500 per client and six months or more in advance.

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### **Financial Conditions Reasonably Likely to Impair Advisory Firm's Ability to Meet Commitments to Clients**

Omega has no condition that is reasonably likely to impair our ability to meet contractual commitments to our clients.

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**Bankruptcy Petitions during the Past Ten Years**

Neither Omega nor its management has had any bankruptcy petitions in the last ten years.

**Item 19: Requirements for State Registered Advisors**

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**Principal Executive Officers and Management Persons**

The education and business background for Srikanth Madineni can be found in the Part 2B of this Brochure.

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**Outside Business Activities**

The outside business activities for Srikanth Madineni can be found in the Part 2B of this Brochure.

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**Performance Based Fee Description**

Omega does not receive any performance-based fees.

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**Disclosure of Material Facts Related to Arbitration or Disciplinary Actions Involving Management Persons**

No management persons of Omega have any disclosures to report.

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**Material Relationship Maintained by this Advisory Business or Management persons with Issuers of Securities**

There are no material relationships with issuers of securities to disclose.

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**Material Conflicts of Interest Assurance**

All material conflicts of interest regarding Omega, its representatives or any of its employees which could be reasonably expected to impair the rendering of unbiased and objective advice are disclosed as required under CCR Section 260.238(k).



Item 1 Cover Page  
**SUPERVISED PERSON BROCHURE**  
FORM ADV PART 2B

**Srikanth Madineni**

**Omega Advisory LLC**

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[omegaadvisory.net](http://omegaadvisory.net)

This brochure supplement provides information about Srikanth Madineni and supplements the Omega Advisory LLC's brochure. You should have received a copy of that brochure. Please contact Srikanth Madineni if you did not receive the brochure or if you have any questions about the contents of this supplement.

Additional information about Srikanth Madineni (CRD #6750109) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**FEBRUARY 24, 2025**

## Brochure Supplement (Part 2B of Form ADV)

### Supervised Person Brochure

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**Srikanth Madineni**

Year of birth: 1970

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#### Item 2 Educational Background and Business Experience

Educational Background:

- Nagarjuna University; Bachelor of Science – Mechanical Engineering; 1992

Business Experience:

- Omega Advisory LLC; Managing Member/Investment Advisor Representative; 01/2017 to Present
  - Unemployed; 07/2016 to 12/2016
  - ZeroChaos; IT Engineer; 07/2013 – 07/2016
  - Estuate Technologies; IT Engineer; 01/2013 – 06/2013
  - ZeroChaos; IT Engineer; 06/2011 – 12/2012
  - IHG; IT Engineer; 05/2010 – 04/2011
  - Synapse Technologies; IT Engineer; 04/2009 – 04/2010
  - B2B Software; IT Engineer; 01/2009 – 04/2009
  - Synapse Technologies; IT Engineer; 01/2007 – 12/2008
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#### Item 3 Disciplinary Information

*Criminal or Civil Action:* None to report.

*Administrative Proceeding:* None to report.

*Self-Regulatory Proceeding:* None to report.

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#### Item 4 Other Business Activities

Srikanth Madineni does not have any outside business activities.

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#### Item 5 Additional Compensation

Srikanth Madineni does not have any additional compensation, nor does he charge performance-based fees. He does not receive any additional compensation for performing advisory services other than what is disclosed in Item 5 of Part 2A.

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#### Item 6 Supervision

Srikanth Madineni is the sole owner of Omega Advisory LLC and therefore he is solely responsible for all supervision and formulation and monitoring of investment advice offered to clients. He will adhere to the policies and procedures as described in the firm's Compliance Manual.

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#### Item 7 Requirements for State-Registered Advisors

*Arbitration Claims:* None to report.

*Self-Regulatory Organization or Administrative Proceeding:* None to report.

*Bankruptcy Petition:* None to report.

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