Item 1: Cover Page

DBA

Part 2A of Form ADV
Firm Brochure

March 20, 2022

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CRD No. 302009

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This brochure provides information about the qualifications and business practices of DataDriven Advisor, LLC. If you have any questions about the contents of this brochure, please contact us at 917-768-3390. 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. Registration as an investment advisor does not imply a certain level of skill or expertise.

Additional information about DataDriven Advisor, LLC is also available on the SEC's website at www.adviserinfo.sec.gov.

Item 2: Material Changes

None.

Item 3: Table of Contents

Item 4: Advisory Business

DataDriven Advisor, LLC

DataDriven Advisor, LLC ("DDA") is a registered investment advisor based in Chicago, Illinois. The firm was formed in 2019 as a Limited Liability Company (LLC) under the laws of the state of Delaware. DDA primarily does business under the name moneypacer (MP). Moneypacer provides one-time financial plans and roadmaps to clients. DDA is owned by Randy Kurtz.

As used in the brochure, the words "we", "our", and "us" refer to DDA or MP, and the words "you", "your", "their", "her", and "client" refer to you either as a client or prospective client of our firm. "Site" refers to either www.moneypacer.com or datadrivenadvisor.com and any part or extension of those domains.

History and Principal Owner: Randy Kurtz (Born 1974). Chief Investment Officer and Chief Compliance Officer of DDA. Concurrently, Randy Kurtz runs Upper Left Wealth Management, LLC. Previously, Randy served as the Founder and Chief Investment Officer of BetaFrontier from 2005-2017, and as the Co-Founder and Chief Investment Officer of Supernova Companies from 2014-2017. Concurrently, Randy was a managing partner at BroadArch Capital, LLC, a NY based hedge fund from 2012-2014. Previously, he was employed at Bear Stearns Asset Management, where he worked on the Large Cap Value Fund from 2002-2005. Randy received an MBA from Columbia University in 2002 and a B.S.B.A in Finance from The Olin Business School at Washington University in St. Louis in 1997. Randy Kurtz is a CFP®.

Description of Advisory Services Offered

MP provides financial plans to clients for a one-time fee. These financial plans are based on algorithms and are intended to be a one-time service only. MP has no ongoing relationship with its clients. Our relationship ceases once the financial plan is delivered to the client. MP does not represent that the financial planning service is meant to replace a comprehensive evaluation of a Client's entire financial plan considering all the Client's circumstances. Should a Client choose to implement any recommendation made by MP, the Client should consult with their tax advisor regarding the Client's personal circumstances. Implementation of a financial plan recommendation is entirely at the Client's discretion.

Our Mission

MP's mission is to deliver AI financial plans to a generation of underserved individuals… people who possibly don't have the assets for a full-service financial advisor, or clients who have not previously engaged with a full-service financial advisor. MP encourages all clients to hire a traditional, full-service financial advisor and to review the MP report with that advisor.

Clients evaluating MP's software-based financial planning service should be aware that MP's relationship with Clients is likely to be different from the "traditional" investment advisory relationship in several aspects:

MP is a software-based advisor which means each Client must acknowledge their ability and willingness to conduct their relationship with MP exclusively on an electronic basis. Under the terms of the Client Agreement, each Client agrees to receive all information, financial plans and communication through their access to the Site and MP's electronic communications.

MP's relationship with Client is one-time in nature. Immediately upon receiving the financial plan, the relationship between MP and Client ceases.

MP encourages all Clients to review the financial plan from MP with a "traditional" financial advisor before acting on or implementing any recommendations.

Wrap Fee Programs

We do not offer wrap fee programs.

Client Assets Under Management

As disclosed in DDA's Form ADV Part 1, DDA does not have any assets undermanagement as of 12/31/2021. We have no intention of having assets under management.

Item 5: Fees and Compensation

Methods of Compensation and Fee Schedule

MP charges a low, one-time fee. Currently, the MP fee is between $49-$999, but we reserve the right to adjust our fee from time to time.

A client investment advisory agreement may be terminated by either party for any reason upon receipt of written notice. No fees shall be reimbursed at any time for any reason. **The contract terminates once the financial roadmap is delivered to the client.**

Additional Client Fees Charged

Clients may face other fees if implementing our suggestions or recommendations. These fees might be in the form of account opening fees at various custodians, trading fees imposed by various custodians, investment advisor fees if Client engages with a full-service investment advisor, taxes of various kinds, fees from mutual funds or ETFs Client chooses to invest in, etc.

Clients may pay other fees or expenses to third parties. The issuer of some of ETFs, mutual funds or other similar financial products, may charge product fees that affect clients. MP does not charge these fees to Clients and does not benefit directly or indirectly from any such fees. An ETF or mutual fund typically includes embedded expenses that may reduce the fund's net asset value, and therefore directly affect the fund's performance and a Client's portfolio performance or an index benchmark comparison. Expenses of an ETF or mutual fund may include management fees, custodian fees, brokerage commissions, and legal and accounting fees. ETF and mutual fund expenses may change from time to time at the sole discretion of the ETF or mutual fund issuer. Further, custodians may charge per trade fees on many ETFs and mutual funds or other securities. These fees vary by custodian, please see your own custodians fee schedule for details. Lastly, a Client's financial advisor charges their own fees. MP does not charge these fees to Clients and does not benefit directly or indirectly from any such fees.

Please refer to the Brokerage Practices section (Item 12) for additional information regarding the firm's brokerage practices.

External Compensation for the Sale of Securities to Clients

MP advisory professionals are compensated solely through a salary and bonus structure. MP is not paid any sales, service or administrative fees for the sale of any other investment products.

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

MP does not charge performance-based fees.

Item 7: Types of Clients

MP aims to serve Clients who are 25-75 years of age, regardless of net worth. MP Clients do not want an ongoing relationship with MP. Rather, they want a one-time financial plan based off of financial information that the Client inputs themselves. MP Clients are encouraged to share their MP financial plan with a traditional full-service financial advisor or tax professional.

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

Methods of Analysis and Investment Strategies

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Methods of Analysis

MP does not recommend specific investments other than generic "retirement date funds".

Clients who allocate some portion of their assets to retirement date funds will likely have exposure to the following six asset classes through ETFs and mutual funds: U.S. equities, International equities, Emerging Market equities, U.S. Bonds, International Bonds and Emerging Market bonds.

Risk Considerations

MP cannot guarantee any level of performance or that any Client will avoid a loss of assets. Any investment in securities involves the possibility of financial loss that Clients should be prepared to bear. When evaluating risk, financial loss may be viewed differently by each Client and may depend on many different risk items, each of which may affect the probability of adverse consequences and the magnitude of any potential losses. The following risks may not be all-inclusive but should be considered carefully by a prospective client before implementing MP's financial roadmap. MP advises all Clients to hire a full-service financial advisor to assist in any investment decisions. These risks should be considered as possibilities, with additional regard to their actual probability of occurring and the effect on a Client if there is in fact an occurrence.

Market Risk. The price of any security or the value of an entire asset class can decline for a variety of reasons outside of MP's control, including, but not limited to, changes in the macroeconomic environment, unpredictable market sentiment, forecasted or unforeseen economic developments, interest rates, regulatory changes, and domestic or foreign political, demographic, or social events. If a Client has a high allocation in a particular asset class, it may negatively affect overall performance to the extent that the asset class underperforms relative to other market assets. Conversely, a low allocation to a particular asset class that outperforms other asset classes in a particular period will cause that Client account to underperform relative to the overall market.

Advisory Risk. There is no guarantee that MP's judgment or recommendations about particular securities or asset classes will necessarily produce the intended results. It is possible that Clients or may experience computer equipment failure, loss of internet access, viruses, or other events that may impair access to their assets. MP and its representatives are not responsible to any Client for losses unless caused by MP breaching its fiduciary duty.

Volatility and Correlation Risk. MP does not recommend specific securities, rather, MP only recommends generic "retirement date funds" and **MP encourages all Clients to seek the counsel of a full-service financial advisor before making any investment decisions**. It is possible that different or unrelated asset classes may exhibit similar price changes in similar directions which may adversely affect a Client's account and may become more acute in times of market upheaval or high volatility. Past performance is no guarantee of future results, and any historical returns, expected returns, or probability projections may not reflect actual future performance.

Liquidity and Valuation Risk – High volatility and/or the lack of deep and active liquid markets for a security may prevent a Client from selling his or her securities at all, or at an advantageous time or price because Client's executing custodian may have difficulty finding a buyer and may be forced to sell at a significant discount to market value. Some securities (including ETFs) that hold or trade financial instruments may be adversely affected by liquidity issues as they manage their portfolios.

Credit Risk. MP cannot control and Clients are exposed to the risk that financial intermediaries or security issuers may experience adverse economic consequences that may include impaired credit ratings, default, bankruptcy or insolvency, any of which may affect portfolio values or management. This risk applies to assets on deposit with any custodian utilized by Client, notwithstanding asset segregation and insurance requirements that are beneficial to custodian clients generally. In addition, exchange trading venues or trade settlement and clearing intermediaries could experience adverse events that may temporarily or permanently limit trading or adversely affect the value of Client securities. Finally, any issuer of securities may experience a credit event that could impair or erase the value of the issuer's securities held by a Client.

Legislative and Tax Risk - Client may directly or indirectly be affected by government legislation or regulation, which may include, but is not limited to: changes in investment adviser / financial advisor or securities trading regulation; change in the U.S. government's guarantee of ultimate payment of principal and interest on certain government securities; and changes in the tax code that could affect interest income, income characterization and/or tax reporting obligations (particularly for ETF securities dealing in natural resources). MP does not engage in tax planning, and in certain circumstances a Client may incur taxable income on his or her investments without a cash distribution to pay the tax due.

Potentially High Levels of Trading Risk. MP does not recommend high levels of trading.

Foreign Investing and Emerging Markets Risk. Foreign investing involves risks not typically associated with U.S. investments, and the risks may be exacerbated further in emerging market countries. These risks may include, among others, adverse fluctuations in foreign currency values, as well as adverse political, social and economic developments affecting one or more foreign countries. In addition, foreign investing may involve less publicly available information and more volatile or less liquid securities markets, particularly in markets that trade a small number of securities, have unstable governments, or involve limited industry. Investments in foreign countries could be affected by factors not present in the U.S., such as restrictions on receiving the investment proceeds from a foreign country, foreign tax laws or tax withholding requirements, unique trade clearance or settlement procedures, and potential difficulties in enforcing contractual obligations or other legal rules that jeopardize shareholder protection. Foreign accounting may be less transparent than U.S. accounting practices and foreign regulation may be inadequate or irregular.

ETF Risks, including Net Asset Valuations and Tracking Error. ETF performance may not exactly match the performance of the index or market benchmark that the ETF is designed to track because 1) the ETF will incur expenses and transaction costs not incurred by any applicable index or market benchmark; 2) certain securities comprising the index or market benchmark tracked by the ETF may, from time to time, temporarily be unavailable; and 3) supply and demand in the market for either the ETF and/or for the securities held by the ETF may cause the ETF shares to trade at a premium or discount to the actual net asset value of the securities owned by the ETF. Certain ETF strategies may from time to time include the purchase of fixed income, commodities, foreign securities, American Depositary Receipts, or other securities for which expenses and commission rates could be higher than normally charged for exchange traded equity securities, and for which market quotations or valuation may be limited or inaccurate. Clients should be aware that to the extent they invest in ETF securities they will pay management fees charged by the issuer of the ETF. An ETF typically includes embedded expenses that may reduce the fund's net asset value, and therefore directly affect the fund's performance and indirectly affect a client's portfolio performance or an index benchmark comparison. Expenses of the fund may include ETF management fees, custodian fees, brokerage commissions, and legal and accounting fees. ETF expenses may change from time to time at the sole discretion of the ETF issuer. ETF tracking error and expenses may vary.

Mutual Fund Risk. Investing in mutual funds carries inherent risk. The major risks of investing in a mutual fund include the quality and experience of the portfolio management team and its ability to create fund value by investing in securities that have positive returns, the amount of individual company diversification, the type and amount of industry diversification, and the type and amount of sector diversification within specific industries. In addition, mutual funds tend to be tax inefficient and therefore investors may pay capital gains taxes on fund investments while not having yet sold the fund. Mutual fund investments bear additional expenses based on a pro-rata share of operating expenses, including potential duplication of management fees. The risk of owning a mutual fund generally reflects the risks of owning the underlying securities held by mutual fund.

Clients should be aware that to the extent they invest in mutual fund investments they will pay any management fees charged by the issuer of the mutual fund.

A mutual fund typically includes embedded expenses that may reduce the fund's net asset value, and therefore directly affect the fund's performance and indirectly affect a client's portfolio performance or an index benchmark comparison. Expenses of the fund may include investment advisor management fees, custodian fees, brokerage commissions, and legal and accounting fees. Mutual fund expenses may change from time to time at the sole discretion of the mutual fund issuer. Mutual fund expenses may vary.

Inflation, Currency, and Interest Rate Risks. Security prices and portfolio returns will likely vary in response to changes in inflation and interest rates. Inflation causes the value of future dollars to be worth less and may reduce the purchasing power of an investor's future interest payments and principal. Inflation also generally leads to higher interest rates, which in turn may cause the value of many types of fixed income investments to decline. In addition, the relative value of the U.S. dollar-denominated assets may be affected by the risk that currency devaluations affect client purchasing power.

Bond Investments. Bond investments are subject to the following risks:

Fixed Income Securities Risk. Fixed income securities carry additional risks than those of equity securities described above. These risks include the company's ability to retire its debt at maturity, the current interest rate environment, the coupon interest rate promised to bondholders, legal constraints, jurisdictional risk (U.S or foreign) and currency risk. If bonds have maturities of ten years or greater, they will likely have greater price swings when interest rates move up or down. Foreign bonds have liquidity and currency risk.

Corporate Debt, Commercial Paper and Certificates of Deposit. Fixed income securities carry additional risks than those of equity securities described above. These risks include the company's ability to retire its debt at maturity, the current interest rate environment, the coupon interest rate promised to bondholders, legal constraints, jurisdictional risk (U.S or foreign) and currency risk. If bonds have maturities of ten years or greater, they will likely have greater price swings when interest rates move up or down. The shorter the maturity the less volatile the price swings. Foreign bonds also have liquidity and currency risk.

Commercial paper and certificates of deposit are generally considered safe instruments, although they are subject to the level of general interest rates, the credit quality of the issuing bank and the length of maturity. With respect to certificates of deposit, depending on the length of maturity there can be prepayment penalties if the client needs to convert the certificate of deposit to cash prior to maturity.

Municipal Securities. Municipal securities carry additional risks than those of corporate and bank-sponsored debt securities described above. These risks include the municipality's ability to raise additional tax revenue or other revenue (in the event the bonds are revenue bonds) to pay interest on its debt and to retire its debt at maturity. Municipal bonds are generally tax free at the federal level, but may be taxable in individual states where the client resides, and capital gains and losses are generally taxable at all levels of government,

Government and Agency Mortgage-Backed Securities. The principal issuers or guarantors of mortgage-backed securities are the Government National Mortgage Association ("GNMA"), Fannie Mae ("FNMA") and the Federal Home Loan Mortgage Corporation ("FHLMC"). GNMA, a wholly owned U.S. government corporation within the Department of Housing and Urban Development ("HUD"), creates pass-through securities from pools of government-guaranteed (Farmers' Home Administration, Federal Housing Authority or Veterans Administration) mortgages. The principal and interest on GNMA pass-through securities are backed by the full faith and credit of the U.S. government.

FNMA, which is a U.S. government-sponsored corporation owned entirely by private stockholders that is subject to regulation by the secretary of HUD, and FHLMC, a corporate instrumentality of the U.S. government, issue pass-through securities from pools of conventional and federally insured and/or guaranteed residential mortgages. FNMA guarantees full and timely payment of all interest and principal, and FHMLC guarantees timely payment of interest and ultimate collection of principal of its pass-through securities. Mortgage-backed securities from FNMA and FHLMC are not backed by the full faith and credit of the U.S. government.

Corporate Debt Obligations. Corporate debt obligations include corporate bonds, debentures, notes, commercial paper and other similar corporate debt instruments. Companies use these instruments to borrow money from investors. The issuer pays the investor a fixed or variable rate of interest and must repay the amount borrowed at maturity. Commercial paper (short-term unsecured promissory notes) is issued by companies to finance their current obligations and normally has a maturity of less than nine months. In addition, the firm may also invest in corporate debt securities registered and sold in the United States by foreign issuers (Yankee bonds) and those sold outside the U.S. by foreign or U.S. issuers (Eurobonds).

Mortgage-Backed Securities. Mortgage-backed securities represent interests in a pool of mortgage loans originated by lenders such as commercial banks, savings associations, and mortgage bankers and brokers. Mortgage-backed securities may be issued by governmental or government-related entities, or by non-governmental entities such as special-purpose trusts created by commercial lenders.

Pools of mortgages consist of whole mortgage loans or participations in mortgage loans. The majority of these loans are made to purchasers of between one and four family homes. The terms and characteristics of the mortgage instruments are generally uniform within a pool but may vary among pools. For example, in addition to fixed-rate, fixed-term mortgages, the firm may purchase pools of adjustable-rate mortgages, growing equity mortgages, graduated payment mortgages and other types. Mortgage poolers apply qualification standards to lending institutions, which originate mortgages for the pools as well as credit standards and underwriting criteria for individual mortgages included in the pools. In addition, many mortgages included in pools are insured through private mortgage insurance companies.

Mortgage-backed securities differ from other forms of fixed income securities, which normally provide for periodic payment of interest in fixed amounts with principal payments at maturity or on specified call dates. Most mortgage-backed securities, however, are pass-through securities, which means that investors receive payments consisting of a pro rata share of both principal and interest (less servicing and other fees), as well as unscheduled prepayments as loans in the underlying mortgage pool are paid off by the borrowers. Additional prepayments to holders of these securities are caused by prepayments resulting from the sale or foreclosure of the underlying property or refinancing of the underlying loans. As prepayment rates of individual pools of mortgage loans vary widely, it is not possible to accurately predict the average life of a particular mortgage-backed security. Although mortgage-backed securities are issued with stated maturities of up to 40 years, unscheduled or early payments of principal and interest on the mortgages may shorten considerably the securities' effective maturities.

Asset-Backed Securities. Like mortgages-backed securities, the collateral underlying asset-backed securities are subject to prepayment, which may reduce the overall return to holders of asset-backed securities. Asset-backed securities present certain additional and unique risks. Primarily, these securities do not always have the benefit of a security interest in collateral comparable to the security interests associated with mortgage-backed securities. Credit card receivables are in general unsecured. Debtors are entitled to the protection of a number of state and federal consumer credit laws, many of which give such debtors the right to set-off certain amounts owed on the credit cards, thereby reducing the balance due.

Generally, automobile receivables are secured by automobiles. Most issuers of automobile receivables permit the loan servicers to retain possession of the underlying obligations. If the servicer were to sell these obligations to another party, there is a risk that the purchaser would acquire an interest superior to that of the holders of the asset-backed securities. In addition, because of the large number of vehicles involved in a typical issuance and the technical requirements under state laws, the trustee for the holders of the automobile receivables may not have a proper security interest in the underlying automobiles. As a result, the risk that recovery on repossessed collateral might be unavailable or inadequate to support payments on asset-backed securities is greater for asset-backed securities than for mortgage-backed securities. In addition, because asset-backed securities are relatively new, the market experience in these securities is limited and the market's ability to sustain liquidity through all phases of an interest rate or economic cycle has not been tested.

Collateralized Obligations. Collateralized mortgage obligations ("CMOs") are collateralized by mortgage-backed securities issued by GNMA, FHLMC or FNMA ("mortgage assets"). CMOs are multiple-class debt obligations. Payments of principal and interest on the mortgage assets are passed through to the holders of the CMOs as they are received, although certain classes (often referred to as "tranches") of CMOs have priority over other classes with respect to the receipt of mortgage prepayments. Each tranche is issued at a specific or floating coupon rate and has a stated maturity or final distribution date. Interest is paid or accrues in all tranches on a monthly, quarterly or semi-annual basis. Payments of principal and interest on mortgage assets are commonly applied to the tranches in the order of their respective maturities or final distribution dates, so that generally no payment of principal will be made on any tranche until all other tranches with earlier stated maturity or distribution dates have been paid in full.

Collateralized debt obligations ("CDOs") include collateralized bond obligations ("CBOs"), collateralized loan obligations ("CLOs") and other similarly structured securities. CBOs and CLOs are types of asset-backed securities. A CBO is a trust that is backed by a diversified pool of high-risk, below-investment-grade fixed income securities. A CLO is a trust typically collateralized by a pool of loans, which may include, among others, domestic and foreign senior secured loans, senior unsecured loans and subordinate corporate loans, including loans that may be rated below investment grade or equivalent unrated loans.

Short-Term Trading. MP does not recommend Clients engage in short-term trading.

Item 9: Disciplinary Information

MP does not have any material legal, financial, regulatory, or other "disciplinary" item to report to any client.

Item 10: Other Financial Industry Activities and Affiliations

Broker-Dealer or Representative Registration

Neither MP nor its affiliates, employees, or independent contractors are registered broker-dealers and do not have an application to register pending.

Futures or Commodity Registration

Neither MP nor its affiliates are registered as a commodity firm, futures commission merchant, commodity pool operator or commodity trading advisor and do not have an application to register pending.

Material Relationships Maintained by this Advisory Business and Conflicts of Interest

MP is owned and operated by Randy Kurtz, who also owns and operates Upper Left Wealth Management, LLC, a financial Advisory firm. Randy spends approximately 200 hours per month on that business currently.

Recommendation or Selection of Other Investment Advisors and Conflicts of Interest

MP does not recommend separate account managers or other investment products in which it receives any form of referral or solicitor compensation from the separate account manager or client.

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

Code of Ethics Description

In accordance with the Advisers Act, MP has adopted policies and procedures designed to detect and prevent insider trading. In addition, MP has adopted a Code of Ethics (the “Code”). Among other things, the Code includes written procedures governing the conduct of MP’s advisory and access persons. The Code also imposes certain reporting obligations on persons subject to the Code. The Code and applicable securities transactions are monitored by the chief compliance officer of MP. MP will send clients a copy of its Code of Ethics upon written request.

MP has policies and procedures in place to ensure that the interests of its clients are given preference over those of MP, its affiliates and its employees. For example, there are policies in place to prevent the misappropriation of material non-public information, and such other policies and procedures reasonably designed to comply with federal and state securities laws.

Investment Recommendations Involving a Material Financial Interest and Conflicts of Interest

MP does not engage in principal trading (i.e., the practice of selling stock to advisory clients from a firm's inventory or buying stocks from advisory clients into a firm's inventory). In addition, MP does not recommend any securities to advisory clients in which it has some proprietary or ownership interest.

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

MP, its affiliates, employees and their families, trusts, estates, charitable organizations and retirement plans established by it may purchase the same securities as are purchased for clients in accordance with its Code of Ethics policies and procedures. The personal securities transactions by advisory representatives and employees may raise potential conflicts of interest when they trade in a security that is:

- owned by the Client, or
- considered for purchase or sale for the Client.

Such conflict generally refers to the practice of front-running (trading ahead of the Client), which MP specifically prohibits. MP has adopted policies and procedures that are intended to address these conflicts of interest. These policies and procedures:

- require our advisory representatives and employees to act in the Client's best interest
- prohibit fraudulent conduct in connection with the trading of securities in a Client account
- prohibit employees from personally benefitting by causing a Client to act, or fail to act in making investment decisions
- prohibit the firm or its employees from profiting or causing others to profit on knowledge of completed or contemplated Client transactions
- allocate investment opportunities in a fair and equitable manner
- provide for the review of transactions to discover and correct any trades that result in an advisory representative or employee benefitting at the expense of a client.

Advisory representatives and employees must follow MP's procedures when purchasing or selling the same securities purchased or sold for the Client.

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

MP, its affiliates, employees and their families, trusts, estates, charitable organizations, and retirement plans established by it may affect securities transactions for their own accounts that differ from those recommended or effected for other MP Clients. It is the policy of MP to place the Clients' interests above those of MP and its employees.

Item 12: Brokerage Practices

Factors Used to Select Broker-Dealers for Client Transactions

Custodian Recommendations

MP does not recommend custodians.

Clients are responsible for assessing the commissions and other costs charged by broker-dealers and/or custodians.

Soft Dollar Arrangements

MP does not have any soft dollar arrangements.

Brokerage for Client Referrals

MP does not engage in the practice of directing brokerage commissions in exchange for the referral of advisory Clients.

Aggregating Securities Transactions for Client Accounts

Best Execution

MP does not manage Client assets thus we have no best execution information to report.

Security Allocation

MP does not manage Client assets thus we have no security allocation information to report.

Order Aggregation

MP does not manage Client assets thus we have no order aggregation information to report.

Allocation of Trades

MP does not manage Client assets thus we have no allocation of trades information to report.

Item 13: Review of Accounts

Schedule for Periodic Review of Client Accounts

MP does not review any Clients accounts.

Content of Client-Provided Reports and Frequency

MP provides one-time reports only. **MP does not have ongoing relationships with clients**.

Item 14: Client Referrals and Other Compensation

Economic Benefits Provided to the Advisory Firm from External Sources and Conflicts of Interest

MP does not currently participate in referral agreements with third parties. MP is reviewing possibilities to participate in referral agreements with third parties. MP does utilize various online advertising platforms, such as Facebook.

Advisory Firm Payments for Client Referrals

MP does not pay for Client referrals.

Item 15: Custody

MP is not considered to have custody of Client assets for purposes of the Advisers Act.

Item 16: Investment Discretion

MP does not manage Client accounts; thus we do not require full investment discretion.

Item 17: Voting Client Securities

MP does not take discretion with respect to voting proxies on behalf of its Clients. In no event will MP take discretion with respect to voting proxies on behalf of its Clients.

Except as required by applicable law, MP will not be obligated to render advice or take any action on behalf of Clients with respect to assets presently or formerly held in their accounts that become the subject of any legal proceedings, including bankruptcies.

MP has no obligation to determine if securities held by the Client are subject to a pending or resolved class action lawsuit. MP also has no duty to evaluate a Client's eligibility or to submit a claim to participate in the proceeds of a securities class action settlement or verdict. Furthermore, MP has no obligation or responsibility to initiate litigation to recover damages on behalf of Clients who may have been injured as a result of actions, misconduct, or negligence by corporate management of issuers whose securities are held by Clients.

Item 18: Financial Information

Balance Sheet

MP does not require the prepayment of fees of $500 or more, six months or more in advance, and as such is not required to file a balance sheet.

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

MP does not have any financial issues that would impair its ability to provide services to Clients.

Bankruptcy Petitions During the Past Ten Years

There is nothing to report on this item.

Item 19: Requirements for State-Registered Advisors

Principal Executive Officers and Management Persons

Randy Kurtz is the Chief Investment Officer and Chief Compliance Officer of MP. Education and business background information are included in the Brochure Supplement provided with this Brochure.

Outside Business Activities Engaged In

Any outside business activities engaged in by the firm's managers are disclosed in Item 10 of this Brochure and/or Part 2B Brochure Supplement.

Performance-Based Fee Description

MP does not charge performance-based fees. See Item 6 of this Brochure.

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

The firm has no material facts related to arbitration or disciplinary actions involving management persons to disclose.

Material Relationships Maintained by this Advisory Business or Management Persons with Issuers of Securities

Any material relationships maintained by this advisory business or management persons with issuers of securities are disclosed under Item 10 of this Brochure.