



Marketos Wealth Management, LLC

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This brochure contains information detailing the stated business practices of MARKETOS WEALTH MANAGEMENT, LLC (“MWM”).

Questions or requests for additional information should be directed to us by contacting our office or searching our website.

MARKETOS WEALTH MANAGEMENT, LLC is an Investment Adviser registered with the United States Securities and Exchange Commission (SEC). The firm’s CRD No. is 289539.

This Brochure has not been reviewed by the SEC or any State sponsored Securities Agency and the formal registration and approval of any financial advisor should not imply or suggest any heightened level of training or special skill.

The SEC’s website provides a wealth of general knowledge and information across a wide range of investment and financially related topics. Please use www.sec.gov to learn more about investing and/or Marketos Wealth Management and its employees.

Item 2 – Material Changes

Pursuant to SEC Rule, we will provide an annually updated version of this Brochure within 120 days of our December fiscal year-end or sooner in the event of a material or disclosable event. Our Brochure can be requested by phone or mail and can also be accessed by visiting our website.

There have been no material changes since our last Brochure filing on September 18, 2017.

Table of Contents

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

Item 4 – Advisory Business

Marketos Wealth Management is an independent US based SEC Registered Investment Adviser focused on providing its clients with a comprehensive range of investment related solutions necessary in successfully achieving their investment objective.

With his sir name prominent in the Corporate title, Peter C. Marketos takes full use of his reputation and 25 years of experience on Wall Street. With our principal office in mid-town Manhattan, Marketos focuses on a client base that's both US based and International, with England and Greece being the overwhelming location of domicile. When viewed from afar, a good majority of investors can be painted with the same brush when asked the simple question, what worries you? In no order, the responses include worries regarding the overall economy local to them, taxes, local Geo-political events and to a lesser extent global geo-political fears, the human and financial fears associated with acts of terrorism and depending on their geographical local; the financial and human hardships brought on by Natural Disasters such as earthquakes and tsunamis.

United by the lure of financial gain and fearful of similar events, logic would have you think investors based in Greece and investors domiciled in the US should share the exact same approach and areas of expertise by the Financial Services industry. As shocking as the fact that Large banks failed to understand their client needs, is the fact that it continues to exist. Uniquely aware and knowledgeable in the nuances of successfully establishing and documenting a new account for a foreign citizen or non-US entity with a US based Bank and accomplishing the task seamless without delay or increased levels of stress is appreciated by investors who continue to experience a decreasing number of institutions interested in maintaining a geographic presence in certain markets.

Discussed in greater detail in following chapters, the individual attention and understanding that every client is unique, and every unique quality should be considered and included every minute of every day.

Interactive Brokers LLC

The role of a Custodian doesn't resonate or stir heightened levels of attention, but it should.

The corporate stability and the platform of financial products and services that a quality custodian provides, that makes it possible for a small financial services practice to match the same depth of products and services offered by global financial giants.

Headquartered in Greenwich, CT, Interactive Brokers, LLC is a member firm of the NYSE, regulated by FINRA and the SEC enjoying a global presence in the financial services sector with direct access to 26 international markets using 6 international offices. Publicly traded (IBG LLC) with over six billion

dollars in equity capital and an Investment Grade rating by Moody's, clients can combine the security and stability of a large bank with the customer service, attention, and access that a "family office" makes possible.

Every s customer account is insured by the Securities Investor Protection Corporation(SIPC) for the maximum coverage of \$500,000, with an additional \$30 million insured under an excess Policy underwritten by Lloyd's of London.

Individualized Investment Advisory Services

Unencumbered or limited by proprietary products and service, *clients* have the freedom and complete access to ANY third-party portfolio manager, hedge fund, exchange listed equity or debt investment. Every client portfolio is constructed and managed based on the individual objectives and risk/reward definitions unique to each individual.

Marketos Wealth Management DOES NOT classify clients by traditional asset class diversification models that we deem ineffective and provide no value or client benefit.

Marketos Wealth primarily invests client assets in listed individual securities, exchange-traded funds, and individual fixed-income securities.

Marketos Wealth does not issue or maintain lists of "recommended" securities or strategies. We exercise our individual judgment regarding the timing of all purchases, sales, and investment advice we offer.

When beneficial to our client, we may manage several client accounts as a household or "family group" to reduce duplicate annual fees and/or service charges.

Item 5 – Fees and Compensation

MWM offers its services on an annual advisory fee basis calculated upon assets under management.

MWM provides investment advisory services for an annual fee based upon a percentage of the assets under management. The annual fee varies between 0.50% and 1.50% of the assets being managed by MWM, depending upon the size of a client's portfolio and the investment advisory services to be rendered. This fee is prorated and charged quarterly, in advance, based upon the market value of the assets on the last day of the previous quarter.

MWM's annual fee is exclusive of, and in addition to brokerage commissions, transaction fees, and other related costs and expenses which are incurred by the client. MWM does not, however, receive any portion of these commissions, fees, and costs.

MWM, in its sole discretion, will negotiate to charge a lesser advisory fee based upon certain criteria (i.e., anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, pre-existing client, account retention, *pro bono* activities, etc.).

Fee Debit

MWM's Agreement authorizes MWM to debit the client's account for the amount of MWM's fee and to directly remit that advisory fee to MWM. Alternatively, clients may elect to have MWM send an invoice for payment.

Fees for Management during Partial Quarters of Service

For the initial period of investment advisory services, the fees are calculated on a *pro rata* basis.

Termination of the Advisory Relationship

Clients may terminate investment advisory services obtained from MWM, without penalty, at any time upon written notice delivered to and received by MWM. The client is responsible for any fees and charges incurred by the client from third parties as a result of maintaining the account such as transaction fees for any securities transactions executed and account maintenance or custodial fees. Clients who terminate investment advisory services during a quarter are charged a prorated advisory fee based on the date of MWM's receipt of client's written notice to terminate. Any earned but unpaid fees are immediately due and payable, and any unearned fees will be refunded on a prorated basis to the client upon termination.

Clients may make additions to and withdrawals from their account at any time. Additions may be in cash or securities provided that the Custodian reserves the right to liquidate any transferred securities or decline to accept particular securities into a client's account. Clients may withdraw account assets on notice to MWM, subject to the usual and customary securities settlement procedures. However, MWM designs its portfolios as long-term investments and the withdrawal of assets may impair the achievement of a client's investment objectives. MWM may consult with its clients about the options and ramifications of transferring securities. However, clients are advised that when transferred securities are liquidated, they may be subject to transaction fees, fees assessed at the mutual fund level (i.e. contingent deferred sales charge) and/or tax ramifications.

If assets are deposited into or withdrawn from an account after the inception of a quarter, the fee payable with respect to such assets will not be adjusted or prorated based on the number of days remaining in the quarter.

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

By definition, performance-based fees are based on a percentage share of capital gains or appreciation

of client assets over a stated period of time. Side-By-Side Management refers to the practice of simultaneous management of client assets where a portion of the assets are subject to a performance base fee, and others are not. This practice could occur with-in the same account or in separate accounts but be part of the same “house-hold”. Marketos Wealth Management does offer or participate in any of these client fee structures.

Item 7 – Types of Clients

Marketos Wealth Management is unencumbered with either self-imposed or management led directives, detailing such things as policy on minimum account standards or sudden changes in corporate policy that instantly shut down client accounts on the basis of geographic region or country of domicile.

Marketos Wealth Management does not impose minimum standards or annual fees on its clients.

Because we individually tailor every account and avoid the practice of categorizing clients in one of a few broadly defined “vehicles”, it’s highly unlikely that our clients will encounter restrictive account requirements or varied billing practices, often imposed by Independent Separate Account Managers.

If the situation should present itself, Marketos Wealth Management will exhaust every effort to accommodate our client’s best interests and wishes.

Marketos Wealth Management relies on the practice of allowing the individual facts in each case dictate the appropriate course of action.

Marketos Wealth Management generally provides advisory services for individual, high net worth, corporate, estate, and retirement accounts for investors in both the U.S. and Southern Europe.

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

Marketos Wealth Management’s primary method of investment analysis is based on the results of a fundamental review of each potential recommendation.

Fundamental analysis involves the examination of such items as the financial condition and competitive position of a company. It includes a historical review and analysis of management capability. It involves forecasts of earnings and revenue and awareness of possible new products or services that could influence future results, are all part of the fundamental review process. Having a good understanding of the fundamental state of a company doesn’t insure financial success. While its possible for a company to be in good financial health and poised for growth, fundamental analysis does not consider the effects of overall market conditions, which have a tremendous amount influence/effect on corporate valuations, especially when viewed through a narrow band of time.

The acceptance or awareness that no individual investor or technology-driven method has ever provided consistent and predictable success in “timing” markets on a weekly, monthly, or quarterly basis; MWM’s

approach of understanding the unique and personal concerns or comfort level of each client factors – in greatly to the annual success/accomplishment of each client’s investment objective. Understanding how each client defines subjective terms such as “risk” or “good returns” has a bigger influence in the make-up of a client’s portfolio than the fundamental results of any investment.

Marketos Wealth Management asks questions, listens to concerns and welcomes discussion.

Use of Private Pooled Investment Vehicles (“Hedge Funds”)

The portfolio managers of these investment vehicles typically have broad discretion as to the investment selection, use of leverage and lack of diversification requirements that their registered investment company counterparts are subjected to disclose and consider. Any client considering investments in such, will include the distribution and acknowledgment of a document defined as a Private Placement Memorandum prior to the funding of client assets. Included in this document are further details on the Fund and its management, as well as the disclosure of numerous other risks that investors should consider. Acknowledging this long and draconian list of potential risks associated with investments in hedge funds; for certain clients that understand and accept these increased levels of risk or loss of investment principal; the potential for wind-fall returns justify the exposure of a reasonably defined small percentage of their overall net worth.

Use of Margin

The ability to effect margin transactions must include client executed documentation and prior firm approval before the use or execution of any margin transaction.

While the use of margin borrowing can substantially improve returns, such use may also increase the adverse impact to which a client’s portfolio may be negatively impacted. Borrowing is typically secured by a client’s securities and/or other assets in accounts titled or owned by the same entity as the borrower. In certain circumstances, it’s possible that a broker-dealer may demand an increase in the amount of collateral that secures a client’s loan or obligation. If the client were unable to provide additional collateral or liquidate enough assets to meet loan to asset ratios, the broker-dealer has the legal right to liquidate assets to return the loan ratio back to good standing. Liquidation of securities in these situations typically cause extremely adverse consequences to a client’s long and short term financial return.

The decision to authorize or restrict the use of margin should be carefully vetted. We welcome questions and requests for additional information and further one-on-one discussion.

General Risk of Loss

All investments include a reasonable levels of market risk or loss of principal due to daily market

volatility. Clients should have a basic understanding and general awareness of the many factors that cause volatility and influence global markets daily.

Item 9 – Disciplinary Information

Regulatory requirements mandate all RIA's disclose any and all material, legal or disciplinary action involving any adviser. FINRA provides a continuously updated portal where any investor has the ability to access the disciplinary history of any Registered Investment Adviser and/or traditional broker-dealer. The website for FINRA's BrokerCheck portal is: www.finra.org/brokercheck. Investors can search by last name and/or individual CRD #. The CRD # for Peter C. Marketos is 1997184. To review the disciplinary history for Marketos Wealth Management, please use the SEC sponsored investor portal: www.adviserinfo.sec.gov. The CRD# for Marketos Wealth Management is 289539.

Item 10 – Other Financial Industry Activities and Affiliations

Marketos Wealth Management isn't registered as a broker-dealer and has no intentions of ever doing so. Instead, we selected Interactive Brokers LLC, a NYSE and FINRA registered broker-dealer to provide the typical broker-dealer services.

Item 11 – Code of Ethics

Written procedures and a Code of Ethics have been developed and implemented to insure clients receive a consistent and uninterrupted level of customer service defined by MWM, and our employees adhere to the Fiduciary standards defined by industry regulators.

The Code of Ethics and Procedures manual are also designed to prevent employees from participating in the intentional and unknowing violation of Federal and State Securities Law. Among many, are the policies and procedures intended to prohibit the unlawful use of material non-public information (insider information). In the rare and unlikely event of personnel coming into contact or having knowledge of information defined as privileged or non-public information, personnel are instructed to contact compliance personnel immediately and refrain from discussing or making any mention of the circumstance or details regarding their involvement. The effected personnel will be prohibited from trading in any security associated with the material non-public information for a period of time defined by compliance, and the effected securities will be added to a Restricted List that MWM maintains which identifies any security that a member of MWM has knowledge of material non-public information.

Following Fiduciary standards, MWM employees are permitted to invest in the same securities as our clients. Employees of MWM are required to submit copies of any monthly financial statement to which they or their immediate family have any percentage of ownership or entitlement along with documents detailing every transaction. Employees are prohibited from trading in any security on the Restricted List

and must obtain pre-approval for transactions defined as IPO's (initial public offering) or Private Placements.

Upon request, Marketos Wealth Management will provide its clients and interested parties with a copy of its Code of Ethics.

Item 12 – Brokerage Practices

The deciding factor for just about every decision including vendor selection focused on building a practice that farmed out the vast majority of the daily labor-intensive back office tasks to third-party vendors who provide the very same service to a wide range of financial services firms. Skillfully repeating the same process of identifying qualified vendors that provide solutions and services that bridge together to create a client experience that draws for the benefits provided by vendors who remain competitive by continuously investing in new technology and by keeping costs down, ultimately making it possible to compete and offer clients the same exact user experience, access to a deep platform of financial products and services, and the assurance and stability that previously remained exclusive to those defined as global giants within the financial services industry.

Technology, automation, and a huge increase in the number of vendors providing quality low cost solutions have enabled Marketos Wealth Management to thrive by fusing together the client attention, access and personal connection of a “home office”, with the firepower and tools of the big guys.

Perfect example is the strategic use of vendors, is the services of a broker-dealer to facilitate client transactions. Marketos Wealth Management isn't registered as a broker-dealer and has not intention of ever doing so. Instead, we selected Interactive Brokers LLC, a NYSE and FINRA registered broker-dealer to provide the typical broker-dealer services.

Best Execution

The majority of the trades made by MWM are directed through Interactive Brokers LLC a qualified custodian.

As an investment adviser, MWM had the duty to seek out the vendor that proved the "best execution" for the benefit of our clients. Overall cost wasn't the lone factor in how we made our final decision. The vetting process included items such as the accuracy and timeliness of trade execution. We took into account the method of error/dispute resolution that firms outline, and even placed a value on the reputation and financial stability of each vendor we vetted.

Factors that weren't included in the vetting of a broker-dealer included consideration for gifts or entertainment, willingness to cover trade errors MWM was responsible for causing, or the introduction of capital and client referrals.

With very few exceptions, highly liquid exchange listed securities will comprise the overwhelming majority of client transactions. These trades will be entered electronically using a routing system that automatically seeks out the best bid or offer and the largest source of liquidity.

While we encourage clients to maintain their accounts using Interactive Brokers LLC as their custodian, Marketos Wealth Management does offer its clients the flexibility of selecting a broker-dealer of their own choice. MWM will make every effort to negotiate terms that mirror the volume discounts and negotiated commission rate that are in place with Interactive Brokers LLC. It would be incumbent for the client to cover any additional fees or expense incurred.

Item 13 – Review of Accounts

An annual requirement, MWM will make every effort to conduct a Quarterly 10-20-minute conversation/webcam discussion with every client specifically designed to bring into focus any recent but previously undiscussed topic or family choice/decision that could warrant an adjustment or possible complete overhaul of our strategic approach.

Clients can select traditional paper or electronic delivery of Account Statements and individual Transaction Confirmations generated and distributed by Interactive Brokers, LLC. Separately, Marketos Wealth Management Investment Advisory clients will also receive a quarterly report that will include information such as: inventory of account holdings, account performance, along with other market related data.

Clients should compare statement data provided by the Custodian, Interactive Brokers, LLC with that found in reports and statements separately and independently generated with data maintained by Marketos Wealth Management.

Item 14 – Client Referrals and Other Compensation

From time to time Marketos Wealth Management may participate in a on-going fee-split agreement or may provide a “one-time” finders’ fee to an introducing third-party (non-client). The financial terms and agreement must be fully disclosed, documented and accepted by the client during the onboarding process for someone new to the firm.

As of the date hereof, Marketos Wealth Management does not compensate any third-parties to assist with client referrals. We may, from time to time in the future, enter into solicitation agreements pursuant

to which we compensate one or more third parties for client referrals that will result in the provision of investment advisory services. Any future cash solicitation agreements will comply with Rule 206(4)-3 of the Investment Advisers Act of 1940.

Item 15 – Custody

Interactive Brokers LLC, is an independent qualified custodian. Unless explicitly noted, Interactive Brokers LLC is the sole provider of all custodial services and maintains unbroken physical custody of all client funds and/or securities. By regulatory definition, Marketos Wealth Management is deemed to have Limited Custody for the sole purpose of assessing fees/charges as defined and agreed upon in the Marketos Wealth Management Client Agreement.

Redundant safeguards are in place preventing the ability of any member of Marketos Wealth Management from having physical access to client funds and/or securities at any time.

The following paragraph contains further details pursuant to Rule 206(4)-2. If questions or uncertainty persists, we implore you to contact us by phone so we can address every question. We consider the security of client assets and the unwavering stability for those defined as a Custodian, the foundation of everything we represent.

Pursuant to Rule 206(4)-2, we are deemed to have limited custody of our client account's funds and securities because (i) we may debit fees directly from the accounts of such clients and/or (ii) certain clients have executed a letter or instruction or similar asset transfer authorization arrangement with a qualified custodian whereby we are authorized to withdraw client funds or securities maintained with a qualified custodian upon our instruction to the qualified custodian (each, an "SLOA"). The terms of each such SLOA are consistent with the terms described in the February 21, 2017 letter of the Chief Counsel's Office of the Securities and Exchange Commission clarifying custody with respect to a standing letter of instruction or other similar asset transfer authorization arrangement established by a client with a qualified custodian.

The qualified custodian of each client account sends or makes available, on a quarterly basis or more frequently, account statements directly to each client. We urge clients to carefully review these account statements from their qualified custodians and compare the information therein with any financial statements or information received or made available to clients through us or any other outside vendor.

Item 16 – Investment Discretion

Included in the onboarding and documentation of every new client is The Marketos Wealth Management Investment Advisory Agreement. Part of this document focuses on a topic that many investors often misunderstand, Discretion. To insure clients, have a complete and accurate understanding prior to acceptance and execution of the Agreement, the MWM representative responsible for assisting clients

through the onboarding and documentation process, will insure extra time is allotted to discuss the topic and answer questions.

In short, clients can either: grant, deny or grant limited discretion. By granting Full Discretion, the client approves the purchase and/or sale of securities in their account prior to granting or authorizing consent. By not granting the use of Discretion, client acceptance/approval will be required prior to the execution of any purchase or sale of securities on their behalf. Authorizing limited Discretion simply allows for an explicitly predefined grant of how or when Discretion can be exercised for their benefit. Examples of Limited Discretion include limiting the exercise to only the sale of existing investments and not the purchase of any security. Limits can be defined by industry, geographic region or even by an authorized dollar or share limit. If clients elect to grant limited discretion, they're required to submit a separate document detailing the terms or conditions of their limited authority.

Item 17 – Voting Client Securities

Interactive Brokers LLC is responsible for the distribution and notification of every Annual Meeting and Stock Proxy solicitation directed to the address of record of each and every individual client.

Proxy selection and voter participation are both at the sole discretion of each client.

Item 18 – Financial Information

Regulatory requirements mandate the public disclosure of any financial condition or event that could lead or create an impairment or inability for an RIA to meet its contractual and fiduciary commitment. Further, regulatory requirements mandate that all registered investment advisers are free from ever having been named or a party to any bankruptcy filing or proceeding. Marketos Wealth Management remains compliant and condition free of any financial event or commitment that would require a public disclosure.