

Kindred Holdings Investment Advisor, LLC

Firm Brochure - Form ADV Part 2A

This brochure provides information about the qualifications and business practices of Kindred Holdings Investment Advisor, LLC. If you have any questions about the contents of this brochure, please contact us at (917) 640-2802 or by email at: info@kindur.com. 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 Kindred Holdings Investment Advisor, LLC is also available on the SEC's website at www.adviserinfo.sec.gov. Kindred Holdings Investment Advisor, LLC's CRD number is: 296585.

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Registration does not imply a certain level of skill or training.

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Item 2: Material Changes

Kindred Holdings Investment Advisor, LLC has not yet filed an annual updating amendment using the Form ADV Part 2A. Therefore there are no material changes to report.

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Item 4: Advisory Business

A. Description of the Advisory Firm

Kindred Holdings Investment Advisor, LLC (hereinafter “Kindur Advisor”) is a Limited Liability Company organized in the State of Delaware. The firm was formed in November 2017, and the principal owner is Kindred Holdings, Inc..

B. Types of Advisory Services

Robo-Advisory Portfolio Management Services

Kindur Advisor provides “robo-advisory” portfolio management services via an online interface. This entails the use of algorithm-based portfolio management advice, rather than in-person investment advice. These automated investment solutions are customized to each client and based on a variety of individual characteristics, including, but not limited to, the client’s age, risk tolerance, income, and current assets.

Services Limited to Specific Types of Investments

Kindur Advisor generally limits its investment advice to a portfolio of exchange traded funds (“ETFs”) . Kindur Advisor may use other securities as well to help diversify a portfolio when applicable.

C. Client Tailored Services and Client Imposed Restrictions

Kindur Advisor provides online “robo-advisory” portfolio management. To use Kindur Advisor’s investment services, clients inform Kindur Advisor of, among other things, their financial goals, risk tolerance, and personal information through Kindur Advisor’s online applications, and Kindur Advisor’s algorithm then recommends and builds a portfolio of exchange traded funds (“ETFs”) for each of the client’s financial goals and account types. Each portfolio is associated with a target allocation of investment types and/or asset classes. Clients may not impose restrictions on investing in certain securities or types of securities.

D. Wrap Fee Programs

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, and certain other administrative fees. Kindur Advisor does not participate in wrap fee programs.

E. Assets Under Management

Kindur Advisor has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$0	\$0	April 2018

Item 5: Fees and Compensation

A. Fee Schedule

Robo-Advisory Portfolio Management Services Fees

Kindur Advisor provides robo-advisory portfolio management services via an online interface.

Total Assets Under Management	Annual Fees
All Assets	0.50%

The advisory fee is calculated using the value of the assets in the Account on the last business day of the prior billing period.

These fees are generally negotiable and the final fee schedule will be memorialized in the client's advisory agreement. Clients may terminate the agreement without penalty for a full refund of Kindur Advisor's fees within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the Investment Advisory Contract generally with 14 days' written notice.

B. Payment of Fees

Payment of Robo-Advisory Portfolio Management Fees

Asset-based portfolio management fees are withdrawn by a third-party acting as custodian directly from the client's accounts with that third-party pursuant to the client's written authorization on a quarterly basis, or may be invoiced and billed directly to the client on a quarterly basis. Clients may select the method in which they are billed.

C. Client Responsibility For Third Party Fees

Clients are responsible for the payment of all third party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and

distinct from the fees and expenses charged by Kindur Advisor. Please see Item 12 of this brochure regarding broker-dealer/custodian.

D. Prepayment of Fees

Kindur Advisor does not collect fees in advance.

E. Outside Compensation For the Sale of Securities to Clients

Neither Kindur Advisor nor its supervised persons accept any compensation for the sale of investment products, including asset-based sales charges or service fees from the sale of mutual funds.

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

Kindur Advisor does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

Item 7: Types of Clients

Kindur Advisor generally provides advisory services to the following types of clients:

- ❖ Individuals
- ❖ High-Net-Worth Individuals

There is no account minimum for any of Kindur Advisor's services.

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

A. Methods of Analysis and Investment Strategies

Methods of Analysis

Kindur Advisor's methods of analysis include Cyclical analysis, Fundamental analysis, Modern portfolio theory and Quantitative analysis.

Cyclical analysis involves the analysis of business cycles to find favorable conditions for buying and/or selling a security.

Fundamental analysis involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

Modern portfolio theory is a theory of investment that attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, each by carefully choosing the proportions of various asset.

Quantitative analysis deals with measurable factors as distinguished from qualitative considerations such as the character of management or the state of employee morale, such as the value of assets, the cost of capital, historical projections of sales, and so on.

Investment Strategies

Kindur Advisor uses long term trading.

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

B. Material Risks Involved

Methods of Analysis

Cyclical analysis assumes that the markets react in cyclical patterns which, once identified, can be leveraged to provide performance. The primary risks with this strategy are two-fold: 1) the markets do not always repeat cyclical patterns; and 2) if too many investors begin to implement this strategy, then it changes the very cycles these investors are trying to exploit.

Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

Modern portfolio theory assumes that investors are risk averse, meaning that given two portfolios that offer the same expected return, investors will prefer the less risky one. Thus, an investor will take on increased risk only if compensated by higher expected returns. Conversely, an investor who wants higher expected returns must accept more risk. The exact trade-off will be the same for all investors, but different investors will evaluate the trade-off differently based on individual risk aversion characteristics. The implication is that a rational investor will not invest in a portfolio if a second portfolio exists with a more favorable risk-expected return profile – i.e., if for that level of risk an alternative portfolio exists which has better expected returns.

Quantitative analysis Investment strategies using quantitative models may perform differently than expected as a result of, among other things, the factors used in the models, the weight placed on each factor, changes from the factors' historical trends, and technical issues in the construction and implementation of the models.

Investment Strategies

Long term trading is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

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

C. Risks of Specific Securities Utilized

Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below are not guaranteed or insured by the FDIC or any other government agency.

Exchange Traded Funds (ETFs): An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance.

Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Item 9: Disciplinary Information

A. Criminal or Civil Actions

There are no criminal or civil actions to report.

B. Administrative Proceedings

There are no administrative proceedings to report.

C. Self-regulatory Organization (SRO) Proceedings

There are no self-regulatory organization proceedings to report.

Item 10: Other Financial Industry Activities and Affiliations

A. Registration as a Broker/Dealer or Broker/Dealer Representative

Neither Kindur Advisor nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer.

B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

Neither Kindur Advisor nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests

Rhian Laura Horgan is a licensed insurance agent with Kindred Holdings Insurance Agency, LLC, and from time to time, may offer clients advice or products from those activities.. Clients are in no way required to utilize the services of any representative of Kindur Advisor in connection with such individual's activities outside of Kindur Advisor.

D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections

Kindur Advisor does not utilize nor select third-party investment advisers.

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

A. Code of Ethics

Kindur Advisor has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. Kindur Advisor's Code of Ethics is available free upon request to any client or prospective client.

B. Recommendations Involving Material Financial Interests

Kindur Advisor does not recommend that clients buy or sell any security in which a related person to Kindur Advisor or Kindur Advisor has a material financial interest.

C. Investing Personal Money in the Same Securities as Clients

Representatives of Kindur Advisor may buy or sell securities identical to or different than those recommended to clients for their personal accounts. Representatives of Kindur Advisor may have an interest or position in certain securities which may also be recommended to a client. In such instances, Kindur Advisor or its representatives may have a financial incentive to buy or sell such securities for client accounts, although this incentive is limited because Kindur Advisor anticipates that generally client activity in the recommended ETF funds is unlikely to materially impact their price.

Additionally, it is the express policy of Kindur Advisor that no person employed by Kindur Advisor may use material, non-public information obtained during the course of his or her work in deciding whether to purchase or sell any security prior to any pending transaction(s) being executed for an advisory account. This policy is intended to prevent employees from benefiting from transactions placed on behalf of advisory accounts.

D. Trading Securities At/Around the Same Time as Clients' Securities

Representatives of Kindur Advisor may buy or sell securities for their personal accounts at or around the same time as clients. Representatives of Kindur Advisor may have an interest or position in certain securities which may also be recommended to a client. In such instances, Kindur Advisor or its representatives may have a financial incentive to buy or sell such securities for client accounts, although this incentive is limited because Kindur Advisor anticipates that generally client activity in the recommended ETF funds is unlikely to materially impact their price.

Additionally, it is the express policy of Kindur Advisor that no person employed by Kindur Advisor may use material, non-public information obtained during the course of his or her work in deciding whether to purchase or sell any security prior to any pending transaction(s) being executed for an advisory account. This policy is intended to prevent employees from benefiting from transactions placed on behalf of advisory accounts.

Item 12: Brokerage Practices

A. Factors Used to Select Custodians and/or Broker/Dealers

Custodians/broker-dealers will be recommended based on Kindur Advisor's duty to seek "best execution," which is the obligation to seek to execute securities transactions for a client on terms that are the most favorable to the client under the circumstances. The client will not necessarily pay the lowest commission or commission equivalent, and Kindur Advisor may also consider the market expertise and research access provided by the payment of commissions, including but not limited to access to written research, oral communication with analysts, admittance to research conferences and other resources provided by the brokers to aid in the research efforts of Kindur Advisor. Kindur Advisor will never charge a premium or commission on transactions, beyond the actual cost imposed by the broker-dealer/custodian.

1. Research and Other Soft-Dollar Benefits

Kindur Advisor does not have a formal soft dollars program in which soft dollars are used to pay for third party services nor does Kindur Advisor receive research, products, or other services from custodians and broker-dealers in connection with client securities transactions ("soft dollar benefits").

2. Brokerage for Client Referrals

Kindur Advisor receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

3. Clients Directing Which Broker/Dealer/Custodian to Use

Kindur Advisor will require clients to use a specific broker-dealer to execute transactions. Not all advisers require clients to use a particular broker-dealer.

B. Aggregating (Block) Trading for Multiple Client Accounts

If Kindur Advisor buys or sells the same securities on behalf of more than one client, then it may (but would be under no obligation to) aggregate or bunch such securities in a single transaction for multiple clients in order to seek more favorable prices, lower brokerage commissions, or more efficient execution. In such case, Kindur Advisor would place an aggregate order with the broker on behalf of all such clients in order to ensure fairness for all clients; provided, however, that trades would be reviewed periodically to ensure that accounts are not systematically disadvantaged by this policy. Kindur Advisor would determine the appropriate number of shares and select the appropriate brokers consistent with its duty to seek best execution, except for those accounts with specific brokerage direction (if any).

Item 13: Review of Accounts

A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews

Robo-advisory portfolio management accounts are not reviewed by Kindur Advisor, save for automated allocation revisions. Clients are encouraged to update Kindur Advisor of any change in their objectives, risk tolerance, or other pertinent information.

B. Factors That Will Trigger a Non-Periodic Review of Client Accounts

Robo-advisory portfolio management accounts do not undergo non-periodic review by Kindur Advisor, allocations will change in accordance with the portfolio management software utilized by Kindur Advisor and changes to the client's profile.

C. Content and Frequency of Regular Reports Provided to Clients

Robo-advisory portfolio management clients will receive at least quarterly a written report that details the client's account including assets held and asset value, which report will come from the custodian and at least quarterly a written report from Kindur Advisor.

Item 14: Client Referrals and Other Compensation

A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)

Kindur Advisor does not receive any economic benefit, directly or indirectly from any third party for advice rendered to Kindur Advisor's clients.

B. Compensation to Non – Advisory Personnel for Client Referrals

Kindur Advisor does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

Item 15: Custody

Kindur Advisor does not serve as the custodian of any client assets. To the extent asset-based portfolio management fees are withdrawn, such withdrawals are performed by a third-party acting as the custodian directly from the client's accounts with that third-party pursuant to the client's written authorization on a quarterly basis. Clients will receive all account statements and

billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy.

Item 16: Investment Discretion

Kindur Advisor provides discretionary investment advisory services to clients. The advisory contract established with each client sets forth the discretionary authority for trading. Where investment discretion has been granted, Kindur Advisor generally manages the client's account and makes investment decisions without consultation with the client as to when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, what securities to buy or sell, or the price per share.

Item 17: Voting Client Securities (Proxy Voting)

Kindur Advisor will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

Item 18: Financial Information

A. Balance Sheet

Kindur Advisor neither requires nor solicits prepayment of more than \$1,200 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

Neither Kindur Advisor nor its management has any financial condition that is likely to reasonably impair Kindur Advisor's ability to meet contractual commitments to clients.

C. Bankruptcy Petitions in Previous Ten Years

Kindur Advisor has not been the subject of a bankruptcy petition in the last ten years.