

# MPFA Inc.

## Firm Brochure - Form ADV Part 2A

*This brochure provides information about the qualifications and business practices of MPFA Inc.. If you have any questions about the contents of this brochure, please contact us at (917) 533-5593 or by email at: [admin@myperfectfinancialadvisor.com](mailto:admin@myperfectfinancialadvisor.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 MPFA Inc. is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). MPFA Inc.'s CRD number is: 304411.*

2767 Torrington West Street  
Torrington, CT 06790  
(917) 533-5593  
[admin@myperfectfinancialadvisor.com](mailto:admin@myperfectfinancialadvisor.com)  
[www.myperfectfinancialadvisor.com](http://www.myperfectfinancialadvisor.com)

*Registration as an investment adviser does not imply a certain level of skill or training.*

Version Date: 7/31/2019

## **Item 2: Material Changes**

MPFA Inc. has not yet filed an annual updating amendment using the Form ADV Part 2A. Therefore there are no material changes to report.

## Item 3: Table of Contents

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

## **Item 4: Advisory Business**

MPFA Inc. (hereinafter “MPF”) is a Corporation organized in the State of Connecticut. The firm was formed in December 2018, and the principal owner is Nicholas W Stuller.

MPF operates as an internet investment adviser providing U.S.-domiciled clients (“Clients”), by means of a dedicated interactive website, with individually tailored referrals to members of a proprietary network of Firm-curated unaffiliated SEC-registered, state-registered advisors and FINRA registered representatives (“Advisors”). MPF will match a client to a advisor using a variety of questions and data including age, occupation, assets and other information. The advisors separately enter into direct bilateral contractual agreements with Clients for the rendition of investment advisory services. Other than such referrals, MPF does not directly advise Clients or assume responsibility for management or supervision of Client assets.

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. MPF does not participate in wrap fee programs.

MPF will not have any assets under management. MPF does not directly advise Clients or assume responsibility for management or supervision of Client assets.

## **Item 5: Fees and Compensation**

### ***Fees***

MPF will not charge individual clients a fee, rather MPF will charge advisors a fixed fee of \$995 fee per year, per advisor to subscribe to the service. These fees are paid 100% in advance. Fees are paid by check or ACH.

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 MPF. Please see Item 12 of this brochure regarding broker-dealer/custodian.

MPF collects fees in advance. Refunds for fees paid in advance will be returned within fourteen days to the client via check, or return deposit back into the client’s account.

Neither MPF 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**

MPF 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**

MPF generally provides advisory services to the following types of clients:

- ❖ Individuals
- ❖ High-Net-Worth Individuals

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

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

### *Methods of Analysis & Investment Strategies*

MPF does not manage assets directly. The methods of analysis and investment strategies information of each advisor is explained in the Part 2A brochure of each advisor.

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

**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**

There are no criminal, civil, administrative, or 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 MPF 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 MPF 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**

Neither MPF nor its representatives have any material relationships to this advisory business that would present a possible conflict of interest.

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

MPF may direct clients to advisors to manage client's assets. MPF will be compensated from the advisors to which it directs those clients. This relationship will be memorialized in each contract between MPF and each third-party advisor. The fees shared will not exceed any limit imposed by any regulatory agency. MPF will always act in the best interests of the client, including when determining which advisor to recommend to clients. MPF will ensure that all recommended advisers are licensed with the SEC or state regulators.

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

#### **A. Code of Ethics**

MPF 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. MPF's Code of Ethics is available free upon request to any client or prospective client.

## **B. Recommendations Involving Material Financial Interests**

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

## **C. Investing Personal Money in the Same Securities as Clients**

MPF will not recommend to clients securities in which the firm or its representatives also invest.

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

Please see Item 11.C above.

# **Item 12: Brokerage Practices**

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

MPF does not recommend brokers/custodians.

### ***1. Research and Other Soft-Dollar Benefits***

MPF does not trade client's accounts and therefore receives no research, product, or services from a broker-dealer ("soft dollar benefits").

### ***2. Brokerage for Client Referrals***

MPF 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***

MPF does not trade client's accounts.

## **B. Aggregating (Block) Trading for Multiple Client Accounts**

MPF does not trade clients' accounts and therefore does not have the ability to block trade purchases across accounts.

### **Item 13: Review of Accounts**

MPF will not review and/or monitor client accounts managed by advisors.

### **Item 14: Client Referrals and Other Compensation**

MPF will receive compensation in connection with its use of third-party advisers.

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

### **Item 15: Custody**

MPF does not take custody of client accounts at any time. Custody of client's accounts is held primarily at the client's custodian. Clients will receive account statements from the custodian and should carefully review those statements for accuracy.

### **Item 16: Investment Discretion**

MPF does not have discretion over client accounts at any time.

### **Item 17: Voting Client Securities (Proxy Voting)**

MPF 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**

MPF 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 MPF nor its management has any financial condition that is likely to reasonably impair MPF's ability to meet contractual commitments to clients.

## **C. Bankruptcy Petitions in Previous Ten Years**

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