

Stockpile Investment
Advisors, Inc.

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PART 2A OF FORM ADV: FIRM BROCHURE

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This brochure provides information about the qualifications and business practices of Stockpile Investment Advisors, Inc. (“Stockpile”). If you have any questions about the contents of this brochure, please contact us at 877.374.2584. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or by any state securities authority.

Additional information about Stockpile is also available on the SEC’s website at www.adviserinfo.sec.gov.

Registration with the SEC as a registered investment adviser pursuant to the Investment Advisers Act of 1940, as amended (the “Advisers Act”), does not imply a certain level of skill or training.

ITEM 2 MATERIAL CHANGES

As this is Stockpile's initial Brochure, there are no material changes to report. In the future, this section will be utilized to list and describe material changes since the previous annual ADV update.

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ITEM 4 **ADVISORY BUSINESS**

Stockpile Investment Advisors, Inc. (“Stockpile Advisors,” “Adviser”), a Delaware Corporation, was established in 2024 with an office in San Francisco, CA. The Adviser is a wholly owned subsidiary of Stockpile, Inc (“the Parent Company”).

The Parent Company provides an interactive investment application (the “App”) to parents, their children, and new investors (“Clients”). Stockpile Advisors requires a \$1 minimum account size. The Adviser's services are designed and intended only for individuals who reside in the United States. The App is only accessible through the internet or via smartphone application, and is owned and operated by the Adviser’s parent company, Stockpile, Inc.. The App aims to help Clients learn about finance, investing, and how to reach their financial goals. Stockpile Advisors maintains a licensing agreement with the Parent Company for the investment platform within the App (“the Investment Platform”). When Clients subscribe to the Investment Platform, the Adviser provides recommendations, which primarily consist of a selection from a curated list of ETFs, which are tailored to each Client’s preferences, objectives, net-worth, sophistication, and risk tolerance (“Investor Profile”). Stockpile Advisors currently offers its services to individuals located within the United States. Stockpile Advisors collects required information from each Client at time of onboarding and on an ongoing basis thereafter, including specific information about a Client’s financial situation and overall investment objectives. Investment recommendations are then generated and executed by Stockpile Advisors’ proprietary algorithm (“the Algorithm”) based on the information provided. Such recommendations are made on a non-discretionary basis; when a recommendation is provided, a Client will decide whether or not to accept or implement such recommendation(s). Although the Adviser reviews Client Investor Profiles before making a recommendation, the Adviser does not guarantee or ensure the success of any of the recommended investments. The Adviser relies on the individual responses to the profile questions to provide investment recommendations to Clients. As such, Clients must provide accurate, complete, and truthful answers to the Adviser's investment profile questions, and are encouraged to update this Profile via the Investment Platform if at any time it becomes materially inaccurate.

Clients are also permitted to select investments of their own choosing up to a specified percentage of the assets held within an investment account (“Learning Bucket”). Clients who elect to utilize the Learning Bucket option will be allowed to select securities from a universe that is identified and periodically monitored by the Adviser and its Investment Committee. All such activity and conducted on a non-discretionary basis.

The Adviser will provide ongoing and updated guidance each time there is a change to the Investor Profile. Membership via the App, whether BASE or PLUS, includes a parent checking account without a debit card as well as a parent investment account. Neither account results in additional fees to the Client, which are included in the membership fees, as described below in Item 5.

Stockpile Advisors engages Apex Clearing Corporation (“Apex”), an SEC registered broker-dealer and a member of FINRA, to provide execution and clearing services to its Clients. Accordingly, all Client trades are placed through Apex. Clients access the Adviser's investment advisory services through the Adviser managed Investment Platform; however, Clients may also use the App for non-investment advisory services provided and managed by the Parent Company

Stockpile Advisors offers Clients the opportunity to transact in select equities and ETFs. Investment opportunities may be limited by the access and abilities of the clearing firm or other factors. Transactions requested by minors must be approved by the adult on the custodial account. Stockpile Advisors participates in wrap fee programs. Please refer to our Wrap Fee Brochure for additional information.

The Adviser does not offer any legal or tax advice with respect to its investment recommendations or investment advisory services generally. As such, the Adviser encourages individuals to seek the advice of their attorneys, accountants, or other professionals regarding their specific financial and personal situations. All investments face risk of loss, including possible loss of principal.

ITEM 5 FEES AND COMPENSATION

General

Fees are assessed monthly, in advance. Clients will enroll in Stockpile Inc.’s App with either a BASE Plan or a PLUS Plan in order to access advisory services provided by Stockpile Advisors. Each plan includes 1 adult (minimum) and up to 5 children (maximum). Membership fees are \$4.95 and \$7.95 for the BASE and PLUS plans, respectively.

The Parent Company will charge Clients a monthly fixed membership fee for App access. Stockpile Advisors’ advisory fee is included in the membership fee as a fixed fee of \$.01, per membership, per month. Advisory fees are not generally negotiable, but the Adviser reserves the right to modify or waive fees in its sole discretion.

The membership fee is collected by the Parent Company. The fee is billed directly to the Client and is then remitted to the Parent Company. After collection, the Parent Company.

retains the fee and subsequently passes the fixed amount of \$.01 to the Adviser for advisory services once the Investor Profile has been completed by the Client. The fees paid to the Adviser are not contingent on the amount of client assets under management or the performance of Client accounts.

Memberships canceled after the close of the billing period will be subject to the subsequent billing period; services will remain in effect until the end of such billing period. No refunds of advisory fees paid in advance will be paid to clients, pro rata or otherwise. Please note that the fixed amount paid to the Adviser by the Parent Company is not subject to negotiation, and Clients are encouraged to consider whether this compensation structure aligns with their financial objectives and needs.

BASE Plan: Includes investing and advisory services for a parent and up to five (5) minors..

PLUS Plan: Includes BASE Plan features but also includes children's checking account with a debit card as well as an interest-bearing savings feature.

Fees are debited directly from Client accounts.

Additional Fees and Expenses Payable by Clients

Stockpile Advisors sponsors and participates in a wrap fee program, which generally includes the costs associated with investment advisory services, execution, custody, and reporting. However, clients should be aware that certain fees are separate and distinct from the wrap fee and will be charged in addition to the wrap fee.

These additional fees may include, but are not limited to:

- **SEC Regulatory Fees:** Fees imposed by the U.S. Securities and Exchange Commission (SEC) related to the execution of certain transactions.
- **Trading Activity Fees (TAF):** Fees associated with certain transactions, including those imposed by the Financial Industry Regulatory Authority (FINRA).
- **Outbound Wire Fees:** Charges for processing outgoing wire transfers.
- **Paper Statement and Trade Confirmation Fees:** Fees for receiving paper copies of account statements or trade confirmations.
- **Escheatment Processing Fee:** Fees associated with processing accounts or assets considered abandoned or unclaimed under applicable state laws.

Clients should also be aware that other similar fees and expenses may be incurred on an incidental basis, depending on the services utilized and the nature of the transactions conducted. These fees are not covered by the wrap fee program and will be charged directly to the client's account as applicable.

We encourage clients to review their account statements and discuss any questions or concerns about fees and charges with the Adviser and/or broker.

Exchange Traded Funds (ETFs)

Clients should be aware that the advisory fees charged by the Adviser are separate and distinct from the fees and expenses associated with investments in Exchange-Traded Funds (ETFs). Clients who invest in ETFs will incur these additional costs, which include management fees and other fund expenses, as described in each ETF's prospectus.

These ETF fees are charged directly to the Client and are not included in the advisory fees paid to the Adviser. As a result, Clients will bear these fees in addition to the advisory fees they pay for our services. It is important for Clients to consider the cumulative impact of these fees on their investment returns.

Clients are encouraged to review all fund documents to understand the nature and extent of all fees and expenses associated with ETF investments.

ITEM 6 PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

Performance-Based Fees

Stockpile Advisors does not offer performance-based pricing to Clients at this time.

Side-by-Side Management

Our Algorithm simultaneously provides recommendations to multiple accounts according to similar investment objectives. The simultaneous management of these different investment recommendations could create certain conflicts of interest. Stockpile Advisors recognizes that it has an affirmative duty to treat all such accounts fairly and equitably over time. Although Stockpile Advisors has a duty to treat all similarly managed (i.e., issued recommendations) accounts fairly and equitably over time, such portfolios will not necessarily be issued the same recommendations at all times. While the Adviser maintains a consistent recommendation approach across Clients and accounts, account and portfolio composition may vary based upon the fact that recommendations are made on a non-discretionary basis, and the Client chooses to implement all or none of such recommendations put forth by the Adviser. In general, investment recommendations for each Client account will be made independently from those of other Client accounts, and will be made with specific reference to the individual needs and objectives of each Client account. As a result, although Stockpile Advisors makes recommendations to numerous

accounts with similar investment objectives, or may make recommendations to accounts with different objectives that trade in the same securities, the portfolio decisions, including those made by the Client, relating to these accounts, and the performance resulting from such decisions, may differ from account to account.

Recommendations are limited to a select set of equities or ETF investments. The selection of these investments is based on a number of criteria or factors, including but not limited to performance, liquidity, fees and expenses. No single factor will determine if an ETF or equity security should be retained, removed, or added to the Adviser's investment recommendations; however, certain factors may have an increased impact on the ultimate analysis.

ITEM 7 TYPES OF CLIENTS

Stockpile Advisors provides advice to individuals located within the United States. The minimum account size is \$1.

ITEM 8 METHOD OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

Investment Strategies and Methods of Analysis

Stockpile Advisors utilizes a proprietary, automated Algorithm to make recommendations from a curated list of equities or ETFs based on a Client's preferences and risk tolerance, among other criteria. Stockpile Advisors will present Clients with recommended investments based on the financial information and investment preferences shared by the Client.

Clients receive such investment advice from Stockpile Advisors, but retain discretion as to whether or not such recommendations will be followed, and may make other portfolio and transaction elections.

Risk of Loss

All investing and trading activities risk the loss of capital. Stockpile Advisors cannot guarantee any level of performance or that Clients will not incur a loss of capital. The following risks are not meant to be all-inclusive, but should be considered prior to engaging Stockpile Advisors for its advisory services.

Technology Risk

Advisers who rely on technology for the delivery of services, known as internet-based investment advisers, offer online investment management services using algorithms and automated processes.

Reliance on Algorithms

Stockpile Advisors' recommendations are based on algorithms that analyze market data and historical trends. While algorithms can be effective tools for decision-making, they are not infallible. They may fail to account for certain market conditions, unexpected events, or changes in investment trends, which could lead to suboptimal investment outcomes.

Technology and Security Risks

Internet-based platforms are vulnerable to technological glitches, system failures, or cyber-attacks that could potentially compromise the security of your personal and financial information. Although the Adviser has security measures in place, there is always a risk of data breaches or unauthorized access to your account.

As part of our commitment to safeguarding client funds and protecting against theft, fraud, and other forms of misappropriation, the Adviser has implemented robust security protocols. These protocols include monitoring for illicit or suspicious activity that could pose a threat to Client accounts.

In certain circumstances, if our security systems detect potentially suspicious or illicit activity, we may temporarily restrict access to affected accounts as a precautionary measure. This restriction is intended to protect Client assets and allow for a thorough investigation of the activity in question.

While these security measures are designed to enhance the safety of Client funds, there is a risk that Clients may experience temporary delays or an inability to access their accounts or execute transactions during the period of investigation. We understand that this may cause inconvenience, but we believe these precautions are necessary to prevent unauthorized access or potential financial loss.

Clients are encouraged to report any unusual or unauthorized activity in their accounts to the Adviser immediately. We remain committed to resolving such situations as quickly and efficiently as possible while maintaining the security and integrity of Client accounts.

Advisory Risk

There is no guarantee that the Advisers's Algorithm, analysis, or recommendations pertaining to particular securities will produce the intended results. Our judgment may not be correct and Clients may not achieve their investment objectives. In addition, there is a risk that Stockpile Advisors or its Clients may experience computer issues, including equipment or Platform failure, loss of internet access, viruses, or other events that may impair our ability to provide advisory services.

General Market Risk

The price of any security or the value of an entire asset class can decline for a variety of reasons that Stockpile Advisors cannot 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.

Equity Securities Generally

The value of equity securities generally varies with the performance of the issuer and movements in the equity markets. Investors in equity securities may lose a substantial portion of their principal.

Company-Specific Risk: Company-specific risk, also known as unsystematic risk, is related to the specific company's performance and operations. It includes factors like management decisions, financial health, competition, and business model that can impact the performance of a particular stock.

Volatility: Stocks are often more volatile than other asset classes, meaning their prices can fluctuate significantly over short periods. High volatility can result in both substantial gains and losses.

Sector Risk: Investing heavily in a particular sector can expose you to sector-specific risks. For example, if you heavily invest in technology stocks, you are vulnerable to risks specific to the technology sector, such as changes in technology trends, regulatory actions, and competition.

Exchange Traded Funds ("ETF") Risk

Investing in ETFs carry additional risks, such as the risk of not having the same rights as direct shareholders (e.g. voting rights), paying additional or unexpected fees and charges, not being able to choose the investments within the ETF, the ETF not tracking its underlying

index or asset accurately or consistently, or of facing unfavorable or complex tax consequences, as described further below.

Market Risk: ETFs, like stocks, are subject to market fluctuations. If the underlying assets of the ETF decrease in value, the ETF's value will also drop, potentially leading to losses.

Tracking Error: ETFs are designed to replicate the performance of a specific index or asset class, but they may not perfectly track their benchmark. This discrepancy, known as tracking error, can be caused by various factors, such as fees, expenses, or changes in the underlying assets.

Liquidity Risk: Some ETFs may have low trading volumes, leading to wider bid-ask spreads and difficulty in buying or selling shares at desired prices. This can be particularly problematic in volatile markets.

Issuer Risk: The financial stability and management practices of the ETF issuer can impact the performance of the ETF. If the issuer faces financial difficulties, it could affect the liquidity or value of the ETF.

Concentration Risk: Some ETFs are heavily concentrated in specific sectors, industries, or geographic regions. This lack of diversification can increase risk if the concentrated area performs poorly.

Currency Risk: For ETFs that invest in foreign assets, changes in exchange rates can impact returns. A strong U.S. dollar, for example, can reduce the value of foreign investments.

Interest Rate Risk: For bond ETFs, changes in interest rates can affect the value of the underlying bonds, impacting the ETF's price. Rising interest rates typically lead to falling bond prices.

Management Risk: While many ETFs are passively managed, those that are actively managed depend on the decisions of the fund manager. Poor investment decisions by the manager can negatively impact the ETF's performance.

Tax Implications: While ETFs are generally tax-efficient, there can be tax implications depending on the structure of the ETF and the investor's individual situation, such as capital gains taxes when selling ETF shares.

ITEM 9 DISCIPLINARY INFORMATION

There are no legal or disciplinary events that are material to a Client's evaluation of Stockpile Advisors or the integrity of our management or any employee of our Firm.

ITEM 10 OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

Stockpile Investments, Inc (CRD#: 156170/SEC#: 8-68772) is a FINRA member broker dealer which is under common ownership with the Adviser. The Adviser does not utilize Stockpile Investments for any brokerage services; all brokerage services are provided by a third-party broker-dealer. Neither Stockpile Advisors nor any of its management persons is registered, or has applied to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person thereof.

None of Stockpile Advisors' employees or officers have relationships with related parties in the financial services industry that materially affect Stockpile Advisors' advisory service.

None of Stockpile Advisors' employees or officers recommend or select investment advisers for Clients or have any business relationships with other investment advisers.

ITEM 11 CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

Our employees are permitted to invest in the same securities that are held by and/or recommended to Clients in personal brokerage accounts held outside the Firm. Stockpile Advisors employees are eligible to hold accounts with Stockpile Advisors and invest alongside Clients. As such, the Adviser has adopted a Code of Ethics that sets forth the standards of conduct expected of employees. All employees, including management, are required to comply with the provisions of the Code of Ethics. The Code of Ethics includes policies and procedures relating to personal trading, gifts and entertainment involving business associates, outside activities, charitable donations, as well as other potential or actual conflicts of interest. All employees and officers must acknowledge receipt of the Code of Ethics and report any violations of the Code to the Chief Compliance Officer.

In addition, the Code of Ethics requires all employees including management to comply with certain rules designed to protect against insider trading. Pursuant to the Code of Ethics, upon commencement of employment, the Adviser's employees who are designated as Access Persons are required to provide an initial holdings report disclosing all personal brokerage accounts, private placements, and investments of limited opportunity (e.g. "hedge funds"). In addition, employees must thereafter provide a personal trading report to the Compliance department within 30 days after the end of each calendar quarter. This report must include every securities transaction (excluding transactions effected in any account over which neither Stockpile Advisors nor the employee has any direct influence or control, and transactions in securities that are direct obligations of the Government of the United

States, bankers' acceptances, bank certificates of deposit, commercial paper, and high quality short-term debt instruments, including repurchase agreements, or shares issued by registered open-end investment companies) in which the employee, the employee's immediate family or trusts of which the employee is a trustee or in which the employee has a beneficial interest have participated during the quarter.

Certain personal trades must be pre-cleared by the Chief Compliance Officer, including investments in private placements and initial public offerings, as referenced above, and such pre-clearance will apply to initial public offerings and private placements, as further described in the Adviser's Code of Ethics. Each employee is also required to provide an annual report of brokerage accounts and holdings along with an acknowledgement at least annually that the employee will comply with the provisions of the Code of Ethics.

Stockpile Advisors is required to keep copies of the Code of Ethics and all records relating thereto. Clients or prospective Clients may obtain a copy of the Code of Ethics upon written request using the address on the front page of this Brochure.

ITEM 12 BROKERAGE PRACTICES

Stockpile Advisors utilizes a qualified custodian to maintain custody of Client assets. This same broker will execute Client transactions. Stockpile Advisors has a fiduciary duty to seek best execution (see further description below), and to ensure that trades are allocated fairly and equitably among Clients over time.

Best Execution – Selection Factors for Broker / Dealers

As noted above, Stockpile Advisors has a duty to seek best execution of transactions for Client accounts. "Best execution" is generally understood to mean the most favorable cost or net proceeds reasonably obtainable under the circumstances. In seeking best execution, Stockpile Advisors looks for the best combination of transaction price, quality of execution (e.g., the speed of execution, the likelihood the trade will be executed, etc.), and other valuable services that an executing broker/dealer may provide.

Clients grant Stockpile Advisors the authority to select the broker/dealer to be used for the purchase or sale of securities. The Adviser, in seeking best execution, will make this selection based on a number of factors, which may include, but are not limited to, the following: the broker/dealer's financial soundness; the broker/dealer's ability to effectively and efficiently execute, report, clear, and settle the order; the broker/dealer's ability to commit capital; the broker/dealer's ability to timely and accurately communicate with the Adviser's trading desk and operations team; the broker/dealer's commission rates; the number of shares being purchased or sold; and similar factors. Stockpile Advisors does not

consider any Client referrals from a broker/dealer when determining best execution, or when placing Client trades.

Stockpile Advisors is not obligated to choose the broker/dealer offering the lowest available commission rate if, in Stockpile Advisors' reasonable judgment, the total cost or proceeds from the transaction may be less favorable than what may be obtained elsewhere or if a higher commission is justified by the service and/or research provided by another broker/dealer.

Stockpile Advisors has implemented a policy to address the conflicts of interest associated with its brokerage practices. To determine that it is receiving best execution for its transactions over time, Stockpile Advisors will obtain information as to the general level of commission rates being charged by the brokerage community, from time to time, and may periodically evaluate the overall reasonableness of brokerage commissions paid on Client transactions by reference to such data.

Directed Brokerage

Stockpile Advisors requires its Clients to use a specified broker/dealer for portfolio transactions in their accounts. This broker is the custodian who has been elected to maintain custody of Client assets.

Cross Trades

Stockpile Advisors does not engage in cross transactions as a matter of policy.

Soft Dollars

Stockpile Advisors does not currently engage in soft dollar arrangements with its brokers or custodians.

Commission Sharing Arrangement

Stockpile Advisors does not engage in commission-sharing arrangements with its brokers or custodians.

Trade Aggregation and Trade Sequence

Stockpile Advisors executes transactions through its third-party broker-dealer as they are submitted. Execution will seek to favor best Client execution. Accounts are subject to ongoing, randomized algorithmic analysis in order to make appropriate transaction recommendations for each account.

Initial Public Offerings

Stockpile Advisors does not offer investments in Initial Public Offerings to its Clients at this time.

Trade Errors

Stockpile Advisors has established error correction procedures which provide that the resolution of errors be made in light of the Adviser's fiduciary duties and in placing an affected Client's interest before that of the Adviser. It is the Adviser's policy to resolve any error identified in a Client account in a manner that the Adviser believes results in no harm to the account.

In the event of a trade error, the Adviser will review each such error on a case-by-case basis. The Adviser will analyze the circumstances surrounding the error and take appropriate action to resolve the issue in a manner that is in the best interest of the affected Clients. Stockpile Advisors will strive to minimize the impact of the error on the Client and may take corrective actions such as adjusting the transaction, providing compensation, or other remedies as deemed necessary. Where the custodian/broker-dealer is the source of trade errors, Stockpile Advisors will generally seek reimbursement from such custodian/broker-dealer.

Stockpile Advisors Employee Investment Eligibility and Activity

Employees are eligible to hold accounts with Stockpile Advisors. The Firm maintains a Code of Ethics designed to address conflicts of interest associated with this practice.

ITEM 13 REVIEW OF ACCOUNTS

Investor Profile Review and Ongoing Monitoring

Stockpile Advisors requires Clients to regularly review, confirm, and update their Investor Profile no less than annually. This process is essential for ensuring that the recommendations made by Stockpile Advisors continue to align with the Clients' financial goals, risk tolerance, and overall investment objectives. Clients are also responsible for updating their profile information whenever it becomes materially inaccurate. Any updates made to the Investor Profile will result in an updated, ongoing recommendation from Stockpile Advisors, ensuring that the advice provided is consistent with the Client's current financial situation and investment preferences.

While investment decisions remain discretionary to the Client, Stockpile Advisors will review the Investor Profile no less than annually as part of its commitment to providing

appropriate recommendations that align with the Client's stated objectives. This annual review process is facilitated by Stockpile Advisors and is designed to capture any changes in the Client's financial situation or investment preferences, thereby ensuring that the investment advice remains relevant and tailored to the Client's needs. In addition, where a Client elects to make an investment that the Adviser deems to fall outside of a typical recommendation for their respective Investor Profile, the Adviser will display a message to Clients indicating as such prior to allowing Clients to move forward with any such investment.

Similarly, the Adviser's Investment Committee periodically reviews the curated list of approved securities for Client investment. This process is facilitated through the Adviser's Investment Committee, which convenes no less than annually.

Clients receive reports solely through the Adviser's Platform, which provides real-time access to account information and performance metrics. Additionally, the custodian provides clients with statements on at least a quarterly basis, as outlined in Item 15. These statements serve as an official record of account activity, and clients are encouraged to review them in conjunction with their ongoing Investor Profile updates.

ITEM 14 CLIENT REFERRALS AND OTHER COMPENSATION

Stockpile Advisors does not receive economic benefits from third-parties for providing investment recommendations for Client referrals.

Stockpile Advisors utilizes third-party solicitors for the purposes of obtaining new Clients. Stockpile Advisors may occasionally compensate current Clients for referrals as permitted by the Investment Advisers Act of 1940 Rule 206(4)-1.

These solicitors are compensated for their referral activities in accordance with a written agreement between the Adviser and the solicitor. This compensation may be in the form of a flat fee, a percentage of the fees generated from the referred client, or another agreed-upon arrangement.

In accordance with Rule 206(4)-1 of the Investment Advisers Act of 1940, the Adviser ensures that all solicitation arrangements comply with the provisions of this rule. Specifically, the Adviser requires that each solicitor, at the time of solicitation, provides the prospective Client with a copy of the Adviser's Form ADV Part 2A and a separate, written solicitor disclosure document. This solicitor disclosure document clearly outlines the terms of the solicitation agreement, including the compensation arrangement between the solicitor and the Adviser, as well as any additional costs or fees that may be incurred by the Client as a result of the solicitation.

Furthermore, the Adviser ensures that all solicitors are in compliance with applicable federal and state laws and regulations, and that they are not subject to any disqualifications under the Investment Advisers Act.

Stockpile Advisors will disclose any material conflicts of interest that may arise from the use of solicitors. Clients referred by solicitors do not pay a higher advisory fee than Clients who engage the Adviser directly. However, Clients should be aware that the existence of a referral arrangement may create an incentive for the solicitor to recommend Stockpile Advisors over other advisers.

The Adviser solicits prospective Clients exclusively through internet-based means and platforms, in alignment with its obligations under the internet adviser exemption of the Investment Advisers Act of 1940. This approach allows the Adviser to reach and engage with Clients efficiently and effectively, while adhering to the regulatory requirements specific to internet advisers.

Any third-party solicitors engaged by the Adviser for Client referrals also operate through internet-based platforms. Solicitation activities are conducted online, using solicitor websites, email campaigns, social media, and other third-party digital platforms.

By conducting all solicitation activities through internet-based means, the Adviser maintains compliance with the specific provisions of the internet adviser exemption, which requires that advisory services be provided through an interactive website and that the Adviser maintains its primary Client relationship via internet-based communications.

ITEM 15 CUSTODY

Stockpile Advisors has appointed an independent qualified custodian as its agent to hold custody of Clients' funds and securities. The qualified custodian will provide the Client with at least quarterly account statements relating to the assets held within the account managed by Stockpile Advisors. Each Client should carefully review the qualified custodian's statement upon receipt to determine that it completely and accurately states all holdings in the Client's account and all account activity over the relevant period. Any discrepancies identified by a Client should be immediately reported to Stockpile Advisors and/or the qualified custodian. Such questions, concerns, or discrepancies may be communicated to Stockpile Advisors by writing, e-mailing, or telephoning us at the contact information listed in "Item 1 – Cover Page" of this Brochure.

ITEM 16 INVESTMENT DISCRETION

As noted above, the Adviser does not accept discretionary authority over Client assets, and provides investment recommendations to self-directed accounts, which retain investment decision-making responsibility regarding all recommendations received from Stockpile Advisors.

ITEM 17 VOTING CLIENT SECURITIES

Stockpile Advisors does not have authority to vote securities on behalf of Clients at this time.

ITEM 18 FINANCIAL INFORMATION

Stockpile Advisors does not require or solicit prepayment of more than \$1,200 of advisory fees per client more than six (6) months in advance from Clients and does not have any financial condition that would impair its ability to meet contractual commitments to Clients.

ITEM 19 REQUIREMENTS FOR STATE-REGISTERED ADVISERS

This item is not applicable to Stockpile Advisors.