



# My Portfolio Guide

• *Personal Wealth Management* •

## *Firm Brochure*

*This brochure provides information about the qualifications and business practices of My Portfolio Guide, LLC. If you have any questions about the contents of this brochure, please contact us at (562)799-5595 or by email at: [matt@myportfolioguide.com](mailto:matt@myportfolioguide.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 My Portfolio Guide, LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). My Portfolio Guide, LLC's CRD number is: 153188*

3020 Old Ranch Parkway, Suite 300  
Seal Beach, California  
(562)799-5595  
[www.MyPortfolioGuide.com](http://www.MyPortfolioGuide.com)  
[Matt@MyPortfolioGuide.com](mailto:Matt@MyPortfolioGuide.com)

*Registration does not imply a certain level of skill or training. Version Date 3/1/2024*

## Item 2: Material Changes

My Portfolio Guide, LLC updates this document annually, or more frequently as needed to report material changes. This section outlines and summarizes the specific changes made since the last update. My Portfolio Guide will deliver a copy of this section to clients within 120 days of the close of its fiscal year to make sure clients are aware of any material changes to the firm's business.

This disclosure document, dated 3/1/2024, includes the material changes below. My Portfolio Guide clients may request a full copy of the latest version of this document at any time by contacting Matthew Pixa: (562) 799-5595 or via email at: [Matt@MyPortfolioGuide.com](mailto:Matt@MyPortfolioGuide.com).

**Amendments: MPG is filing for registration with the SEC and will no longer be a State of CA registered investment advisor.**

## Item 3: Table of Contents

### ADV Part 2A

Item 2: Material Changes .....	i
Item 3: Table of Contents .....	ii
Item 4: Advisory Business .....	1
Item 5: Fees and Compensation .....	2
Item 6: Performance-Based Fees and Side-By-Side Management .....	3
Item 7: Types of Clients .....	4
Item 8: Methods of Analysis, Investment Strategies, and Risk of Investment Loss .....	4
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 .....	5
Item 12: Brokerage Practices .....	6
Item 13: Reviews of Accounts .....	6
Item 14: Client Referrals and Other Compensation .....	7
Item 15: Custody .....	7
Item 16: Investment Discretion .....	7
Item 17: Voting Client Securities (Proxy Voting) .....	7
Item 18: Financial Information .....	8
Item 19: Requirements For State Registered Advisers .....	8

## Item 4: Advisory Business

My Portfolio Guide, LLC (hereinafter “MPG”) is a Limited Liability Company organized in the state of California.

My Portfolio Guide, LLC has been in business since April 4, 2010. The principal owner is Matthew Pixa.

MPG offers discretionary and non-discretionary ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. MPG provides portfolio management services to both separately managed accounts and retirement plans for a percentage of assets under management.

MPG creates an Investment Policy Statement for each client, which outlines the client’s current situation (income, tax levels, and risk tolerance levels) and then constructs a plan (the Investment Policy Statement) to aid in the selection of a portfolio that matches each client’s specific situation. Investment Supervisory Services include, but are not limited to, the following:

- Investment strategy
- Asset allocation
- Risk tolerance
- Personal investment policy
- Asset selection
- Regular portfolio monitoring

MPG evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. MPG will request discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

MPG has created six customized and proprietary models (“Disciplined Investor Models”) that are used as a baseline for each portfolio. From there MPG customizes each to suit the more specific goals, tax situations, or preferences each unique client may have. MPG also has a strategy for some portfolios that aims for longer-term growth with a focus on dividends. This is our “MPG Dividend Driver” portfolio strategy.

MPG typically includes financial planning discussions, presentations, and solutions as part of the investment management fee. The financial plans are updated annually as part of the investment supervisory service provided to clients. For the rare occasion when there is a need for MPG to bill clients for financial planning services, they will do so at a predetermined hourly rate. Financial plans and financial planning may include, but are not limited to: investment planning, life insurance; tax concerns; retirement planning; college planning; and debt/credit planning. These services are based on hourly fees and the final fee structure is documented in Exhibit II of the Financial Planning Agreement.

MPG provides “The Guide,” a complimentary newsletter to clients that offers market commentary and analysis. Clients will receive the newsletter 2-3 times per year.

MPG generally limits its investment advice and/or money management to mutual funds, equities, bonds, fixed income, debt securities, ETFs, REITs, insurance products including annuities, and government securities. MPG may use other securities as well to help diversify a portfolio when applicable.

MPG offers the same suite of services to all of its clients. However, specific client financial plans and their implementation are dependent upon the client Investment Policy Statement which outlines each client's current situation (income, tax levels, and risk tolerance levels) and is used to construct a client specific plan to aid in the selection of a portfolio that matches restrictions, needs, and targets.

#### IRA Rollover Recommendations

When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. Under this special rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice).
- Never put our financial interests ahead of yours when making recommendations (give loyal advice).
- Avoid misleading statements about conflicts of interest, fees, and investments.
- Follow policies and procedures designed to ensure that we give advice that is in your best interest.
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest

Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent MPG from properly servicing the client account, or if the restrictions would require MPG to deviate from its standard suite of services, MPG reserves the right to end the relationship.

MPG has approximately \$114,101,485 under discretionary management and \$28,000 under non-discretionary management as of December 31, 2023.

## Item 5: Fees and Compensation

MPG provides investment supervisory services to clients based on the fee schedules outlined below:

#### *Fees for Separately Managed Accounts*

Total Assets Under Management	Annual Fee
\$1 - \$1,000,000	0.90%
\$1,000,001 - \$2,000,000	0.80%
\$2,000,001 - \$3,000,000	0.70%
\$3,000,001 - \$5,000,000	0.50%
Above \$5,000,000	0.40%

### **Fees for Retirement Plans**

Total Assets Under Management	Annual Fee
\$1 - \$3,000,000	0.45%
\$3,000,001 - \$5,000,000	0.35%
\$5,000,001 - \$10,000,000	0.25%
\$10,000,001 - \$20,000,000	0.20%
Above \$20,000,000	0.15%

***These fees are negotiable depending upon the needs of the client and complexity of the situation, and the final fee schedule is attached as Exhibit II of the Investment Advisor Contract. Fees will be withdrawn directly from the client's account quarterly in arrears. Clients may also choose to have fees billed quarterly in arrears, with fees to be paid via check upon receipt invoice. When fees are deducted directly by the Custodian, MPG must have written authorization from the client to withdraw fees, they must send an invoice directly to the client explaining each fee debit, and they must also have a custodian who sends at least a quarterly statement showing all debits.***

Clients may terminate their accounts without penalty within 5 business days of signing the advisory contract. Fees for all services provided will be due upon termination if the client wishes to discontinue the relationship with MPG.

In cases where MPG provides financial planning services or consulting to clients for a fee, the hourly rate will be \$250 to \$500 depending on the needs of the client and complexity of the situation. The fees are negotiable, and the final fee schedule will be attached as Exhibit II of the Financial Planning Agreement. Fees are paid in arrears upon completion. Because fees are charged in arrears, no refund is necessary. The fees are negotiable, and the final fee schedule will be attached as Exhibit II of the Financial Planning Agreement. Fees will be invoiced to the client with payment to be paid by check. Clients may terminate their accounts without penalty within 5 business days of signing the advisory contract. Fees for all services provided will be due upon termination if the client wishes to discontinue the relationship with MPG.

Clients are responsible for the payment of all third-party fees (i.e. custodian fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by MPG. Please see Item 12 of this brochure regarding broker/custodian.

Neither MPG nor its supervised persons accept any compensation for the sale of securities or other investment products, including asset-based sales charges or services fees from the sale of mutual funds.

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

MPG 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**

MPG generally provides investment advice and/or management supervisory services to Individuals, High-Net-Worth Individuals, Pension and Profit-Sharing Plans.

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

MPG's methods of analysis include charting analysis, fundamental analysis, and technical analysis.

MPG offers two main equity strategies: the MPG Dividend Driver Strategy and the Disciplined Investor Strategy. Each portfolio model or strategy has 6 different allocations customized to the risk tolerance of the specific investor. They are actively managed and monitored and allow us to tactically allocate within a set range of parameters/bandwidths.

A charting analysis involves the use of patterns in performance charts. MPG uses this technique to search for patterns used to help predict favorable conditions for buying and/or selling a security. This strategy involves using and comparing various charts to predict long and short-term performance or market trends. The risk involved in solely using this method is that only past performance data is considered without using other methods to crosscheck data. Using charting analysis without other methods of analysis would be making the assumption that past performance will be indicative of future performance. This may not be the case.

A fundamental analysis involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages. This strategy 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.

A technical analysis involves the analysis of past market data, primarily price and volume. This strategy attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not

work long term.

MPG uses long term trading, short term trading, and short sales strategies. Long term trading is designed to capture market rates of both return and risk. Frequent trading, when done, can affect investment performance, particularly through increased brokerage and other transaction costs and taxes. Short term trading and short sales generally hold greater risk and clients should be aware that there is a material risk of loss using any of those strategies. MPG generally seeks investment strategies that do not involve significant or unusual risk beyond that of the general domestic and/or international equity markets. However, it will utilize short sales which generally hold greater risk of capital loss and clients should be aware that there is a material risk of loss using any of those strategies.

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

### **Item 9: Disciplinary Information**

MPG has no criminal or civil actions to report. Further, MPG has no administrative proceedings or self-regulatory organization proceedings to report.

### **Item 10: Other Financial Industry Activities and Affiliations**

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



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

### **CODE OF ETHICS**

MPG 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

Sanctions

MPG will always act in the best interest of the client. All conflicts of interest have been disclosed in this brochure document.

ALL PROSPECTIVE AND CURRENT CLIENTS HAVE A RIGHT TO SEE OUR CODE OF ETHICS. OUR CODE OF ETHICS IS AVAILABLE FREE UPON REQUEST TO ANY CLIENT OR PROSPECTIVE CLIENT. FOR A COPY OF THE CODE OF ETHICS, PLEASE ASK YOUR FINANCIAL ADVISOR AT ANY TIME.

MPG does not recommend that clients buy or sell any security in which a related person to MPG or MPG has a material financial interest. From time to time, representatives of MPG may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of MPG to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions create a conflict of interest. MPG will always document any transactions that could be construed as conflicts of interest. In general, MPG will transact client business before its own when similar securities are being bought or sold, but MPG will always act in the best interest of the clients.

## **Item 12: Brokerage Practices**

The Custodian, Schwab & Co., Inc., member FINRA/SIPC, was chosen based on their relatively low transaction fees and access to mutual funds and ETFs. MPG will never charge a premium or commission on transactions, beyond the actual cost imposed by Custodian.

MPG receives research, products, or other services from its broker/dealer or another third-party in connection with client securities transactions ("soft dollar benefits"). There is no minimum client number or dollar number that MPG must meet in order to receive free research from the custodian or broker/dealer. There is no incentive for MPG to direct clients to this particular broker-dealer over other broker-dealers who offer the same services. However, because this firm does not have to produce or pay for services or products it has an incentive to choose a custodian that provides those services based on its interests rather than the clients' interests. The first consideration when recommending broker/dealers to clients is best execution. MPG always acts in the best interest of the client.

MPG will not allow clients to direct MPG to use a specific broker-dealer to execute transactions. Clients must use MPG recommended custodian (broker-dealer). By requiring clients to use our specific custodian, MPG may be unable to achieve most favorable execution of client transactions, and this may cost clients' money over using a lower-cost custodian.

MPG maintains the ability to block trade purchases across accounts. Block trading may benefit a large group of clients by providing MPG the ability to purchase larger blocks resulting in smaller transaction costs to the client. Declining to block trade can cause more expensive trades for clients.

## **Item 13: Reviews of Accounts**

Client accounts are reviewed at least monthly or as needed by Matthew Pixa. The chief advisors will review clients' accounts with regards to their investment policies and risk tolerance levels. All accounts at MPG are assigned to these reviewers.

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance). Each client will receive at least quarterly from the custodian, a written report that details the client's account including assets held and asset value which will come from the custodian.

All financial planning accounts are reviewed upon financial plan creation and plan delivery by Matthew Pixa. For clients who only utilize financial planning services, there is only one level of review and that is the total review conducted to create the financial plan. Clients are provided a one-time financial plan concerning their financial situation. After the presentation of the plan, there are no further reports. Clients may request additional plans or reports for a fee.

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

MPG does not receive any economic benefit, directly or indirectly from any third party for advice rendered to MPG clients. MPG does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

## **Item 15: Custody**

MPG, with client written authority, has limited custody of client's assets through direct fee deduction of MPG's Fees only. If fees are deducted directly by the Custodian, MPG would have constructive custody over that account and must have written authorization from the client to do so. Clients will receive all required account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy. Please refer back to Item five for more information regarding constructive custody.

## **Item 16: Investment Discretion**

For those client accounts where MPG provides ongoing supervision, the client has given MPG written discretionary authority over the client's accounts with respect to securities to be bought or sold and the amount of securities to be bought or sold. Details of this relationship are fully disclosed to the client before any advisory relationship has commenced. The client provides MPG discretionary authority via a limited power of attorney in the Investment Advisory Contract and in the contract between the client and the custodian.

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

MPG 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**

MPG does not require nor solicit prepayment of more than \$1,200 in fees per client, six months or more in advance and does not need to include a balance sheet with this brochure. Neither MPG nor its management has any financial condition that is likely to reasonably impair our ability to meet contractual commitments to clients. MPG has not been the subject of a bankruptcy petition in the last ten years.