



MKT Advisors LLC

Form ADV Part 2A – Disclosure Brochure

Effective: February 2, 2024

This Form ADV Part 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of MKT Advisors LLC (“MKT Advisors” or the “Advisor”). If you have any questions about the content of this Disclosure Brochure, please contact the Advisor at (760) 658-8790 or by email at mkt@mktadvisorsllc.com.

MKT Advisors is a registered investment advisor with the U.S. Securities and Exchange Commission. (“SEC”). The information in this Disclosure Brochure has not been approved or verified by the SEC or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information about MKT Advisors to assist you in determining whether to retain the Advisor.

Additional information about MKT Advisors and its Advisory Persons is available on the SEC’s website at www.adviserinfo.sec.gov by searching with the Advisor’s firm name or CRD# 163833.

MKT Advisors LLC
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<https://mktadvisorsllc.com>

Item 2 – Material Changes

Form ADV 2 is divided into two parts: *Part 2A (the "Disclosure Brochure")* and *Part 2B (the "Brochure Supplement")*. The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about the Advisory Persons of MKT Advisors. For convenience, the Advisor has combined these documents into a single disclosure document.

MKT Advisors believes that communication and transparency are the foundation of its relationship with clients and will continually strive to provide you with complete and accurate information at all times. MKT Advisors encourages all current and prospective clients to read this Disclosure Brochure and discuss any questions you may have with the Advisor.

Material Changes

The following material changes have been made to this Disclosure Brochure since the last filing and distribution to Clients:

- The Advisor recommends the use of unaffiliated independent managers to manage all or a portion of a Client's portfolio. Please see items 4, 5, 8 and 16 for additional information.

Future Changes

From time to time, the Advisor may amend this Disclosure Brochure to reflect changes in business practices, changes in regulations or routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to you annually and if a material change occurs.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with the Advisor's firm name or CRD# 163833. You may also request a copy of this Disclosure Brochure at any time by contacting the Advisor at (760) 658-8790 or by email at mkt@mktadvisorsllc.com.

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Item 4 – Advisory Services

A. Firm Information

MKT Advisors LLC (“MKT Advisors” or the “Advisor”) is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). The Advisor is organized as a Limited Liability Company (“LLC”) under the laws of the State of California. MKT Advisors was founded in March 2012 and has been operating as a registered investment advisor since May 2012.

Effective, December 31, 2021, Taylor C. Jobe (Managing Partner and Chief Compliance Officer) serves as the Principal Officer of the Advisor. Prior to December 31, 2021, MKT Advisors was owned by Marc L. Hodgkins and Timothy H. Jobe. For information regarding this Disclosure Brochure, please contact Taylor Jobe at (760) 658-8780.

This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by MKT Advisors. For questions regarding this Disclosure Brochure, please contact Taylor Jobe at (760) 658-8790 or by email at mkt@mktadvisorsllc.com.

B. Advisory Services Offered

MKT Advisors offers investment advisory services to individuals, high net worth individuals, trusts, estates, charitable organizations, foundations, businesses, and/or retirement plans (each referred to as a “Client”).

The Advisor serves as a fiduciary to Clients, as defined under the applicable laws and regulations. As a fiduciary, the Advisor upholds a duty of loyalty, fairness and good faith towards each Client and seeks to mitigate potential conflicts of interest. MKT Advisor’s fiduciary commitment is further described in the Advisor’s Code of Ethics. For more information regarding the Code of Ethics, please see Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.

Investment Management Services

MKT Advisors provides customized investment advisory solutions for its Clients. This is achieved through continuous personal Client contact and interaction while providing discretionary and non-discretionary investment management and related advisory services. MKT Advisors works closely with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to create a portfolio strategy. MKT Advisors will then construct an investment portfolio, consisting of individual stocks, individual bonds, exchange-traded funds (“ETFs”), mutual funds, and/or options to achieve the Client’s investment goals. The Advisor may also utilize other types of investments, as appropriate, to meet the needs of the Client. The Advisor may retain certain legacy investments based on portfolio fit and/or tax considerations. The client’s individual investment strategy is tailored to their specific needs and stated objectives and may include some or all the previously mentioned securities.

MKT Advisor’s investment strategies are primarily long-term focused, but the Advisor may buy, sell or re-allocate positions that have been held for less than one year to meet the objectives of the Client or due to market conditions. MKT Advisors will construct, implement and monitor the portfolio to ensure it meets the goals, objectives, circumstances, and risk tolerance agreed to by the Client. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to acceptance by the Advisor.

MKT Advisors evaluates and selects investments for inclusion in Client portfolios only after applying its internal due diligence process. MKT Advisors may recommend, on occasion, redistributing investment allocations to diversify the portfolio. MKT Advisors may recommend specific positions to increase sector or asset class weightings. The Advisor may recommend employing cash positions as a possible hedge against market movement. MKT Advisors may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position[s] in the portfolio, change in risk tolerance of the Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client’s risk tolerance.

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At no time will MKT Advisors accept or maintain custody of a Client's funds or securities, except for the limited authority as outlined in Item 15 – Custody. All Client assets will be managed within the designated account[s] at the Custodian, pursuant to the terms of the advisory agreement. Please see Item 12 – Brokerage Practices.

Financial Consulting / Planning – MKT Advisors may also provide a variety of financial consulting and planning services to Clients as part of its advisory relationship. This consulting may encompass one or more of the following areas: Investment Planning, Retirement Planning, Estate Planning, Charitable Planning, Education Planning, Insurance Analysis, and Business and/or Personal Financial Planning. Our financial consultations rendered to Clients usually include personalized recommendations for a course of activity or specific actions to be taken by the Client. For example, recommendations may be made that the Client begins or revises investment programs, create or revise wills or trusts, obtain or revise insurance coverage, commence or alter retirement savings, or establish education or charitable giving programs. It should also be noted that the Advisor may refer the Client to an accountant, attorney or other specialist, as necessary for non-advisory related services.

Use of Independent Managers – MKT Advisors may also recommend that a Client utilize one or more unaffiliated investment managers or investment platforms (collectively “Independent Managers”) for all or a portion of a Client's investment portfolio. In such instances, the Client may be required to authorize and enter into an advisory agreement with the Independent Manager[s] that defines the terms in which the Independent Manager[s] will provide investment management and related services. The Advisor may also assist in the development of the initial policy recommendations and managing the ongoing Client relationship. The Advisor will perform initial and ongoing oversight and due diligence over the selected Independent Manager[s] to ensure the Independent Managers' strategies and target allocations remain aligned with investment objectives and overall best interests. The Client, prior to entering into an agreement with unaffiliated investment manager[s] or investment platform[s], will be provided with the Independent Manager's Form ADV 2A (or a brochure that makes the appropriate disclosures).

C. Client Account Management

Prior to engaging MKT Advisors to provide investment advisory services, each Client is required to enter into a written agreement with the Advisor that define the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

- Establishing an Investment Strategy – MKT Advisors, in connection with the Client, will develop a strategy that seeks to achieve the Client's goals and objectives.
- Asset Allocation – MKT Advisors will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation and tolerance for risk for each Client.
- Portfolio Construction – MKT Advisors will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – MKT Advisors will provide investment management and ongoing oversight of the Client's investment portfolio.

D. Wrap Fee Programs

MKT Advisors does not manage or place Client assets into a wrap fee program. Investment management services are provided directly by MKT Advisors.

E. Assets Under Management

As of December 31, 2022, MKT Advisors manages \$353,982,223 in Client assets, \$312,855,918 of which are managed on a discretionary basis and \$41,126,305 on a non-discretionary basis. Clients may request more current information at any time by contacting the Advisor.

Item 5 – Fees and Compensation

The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client engaging the Advisor for services described herein shall be required to enter into a written agreement with the Advisor.

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A. Fees for Advisory Services

Investment advisory fees are paid quarterly, in advance of each calendar quarter, pursuant to the terms of the investment advisory agreement. Investment advisory fees are based on the market value of assets under management at the end of the prior calendar quarter. Investment advisory fees are based on the following schedule:

Assets Under Management (\$)	Annual Rate (%)
First \$1,000,000	1.00%
Next \$4,000,000	0.65%
Next \$5,000,000	0.40%
\$10,000,000 and over	0.35%

Relationships with multiple objectives, specific reporting requirements, portfolio restrictions and other complexities and factors may be charged a higher fee, ranging up to 1.50%.

The investment advisory fee in the first quarter of service is prorated from the inception date of the account[s] to the end of the first quarter. Fees may be negotiable at the sole discretion of the Advisor. The Client's fees will take into consideration the aggregate assets under management with the Advisor. All securities held in accounts managed by MKT Advisors will be independently valued by the Custodian. MKT Advisors will not have the authority or responsibility to value portfolio securities.

The Advisor's fee is exclusive of, and in addition to any applicable securities transaction and custody fees (if applicable), and other related costs and expenses described in Item 5.C below, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs.

Use of Independent Managers

As noted in Item 4, the Advisor may implement all or a portion of a Client's investment portfolio utilizing one or more Independent Managers. The Advisor does not receive or earn any compensation from any Independent Managers. The Advisor will only earn its investment advisory fee as described above. An Independent Manager utilized by the Advisor will charge the Client a fee that is in addition to the fee charged by the Advisor. The total blended fee, including the Advisor's fee and the Independent Manager's fee paid by a Client, will typically not exceed 2.00% annually.

B. Fee Billing

Investment advisory fees are calculated by the Advisor or its delegate and deducted from the Client's account[s] at the Custodian. The Advisor shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client's account[s] at the start of each respective calendar quarter. The amount due is calculated by applying the quarterly rate (annual rate divided by 365 days multiplied by the number of days in the upcoming quarter) to the total assets under management with MKT Advisors at the end of the prior quarter. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the investment advisory fee. Clients are urged to also review and compare the statement provided by the Custodian, as the Custodian does not perform a verification of the Advisor's fees. Clients provide written authorization permitting advisory fees to be deducted by MKT Advisors to be paid directly from their account[s] held by the Custodian as part of the investment advisory agreement and separate account forms provided by the Custodian.

In certain circumstances, the Client may be billed directly, such as when the Client does not wish for funds to be withdrawn from a particular managed account (e.g., retirement accounts, custodial accounts, etc.), but rather prefers to send their quarterly fee payment by alternative means, such as a check or via the use of a third-party payment platform utilized by the Advisor.

Use of Independent Managers – For Client accounts utilizing one or more Independent Manager, the Client's overall fees will include MKT Advisor's investment advisory fee (as noted above) plus investment management fees and/or platform fees charged by the Independent Manager. The Independent Manager will assume the responsibility for calculating the Client's fees and deducting all fees from the Client's account[s].

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C. Other Fees and Expenses

Clients may incur certain fees or charges imposed by third parties, other than MKT Advisors, in connection with investments made on behalf of the Client's account[s]. The Client is responsible for all custody and securities execution fees charged by the Custodian, as applicable. The Advisor's recommended Custodian does not charge securities transaction fees for ETF and equity trades in a Client's account, provided that the account meets the terms and conditions of the Custodian's brokerage requirements. However, the Custodian typically charges for mutual funds and other types of investments. The fees charged by MKT Advisors are separate and distinct from these custody and execution fees.

In addition, all fees paid to MKT Advisors for investment advisory services are separate and distinct from the expenses charged by mutual funds and ETFs to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client may be able to invest in these products directly, without the services of MKT Advisors, but would not receive the services provided by MKT Advisors which are designed, among other things, to assist the Client in determining which products or services are most appropriate for each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by MKT Advisors to fully understand the total fees to be paid. Please refer to Item 12 – Brokerage Practices for additional information.

D. Advance Payment of Fees and Termination

MKT Advisors may be compensated for its investment management services in advance of the quarter in which services are rendered. Either party may terminate the investment advisory agreement, at any time, by providing advance written notice to the other party. The Client may also terminate the investment advisory agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Upon termination, the Advisor will refund any unearned, prepaid investment advisory fees from the effective date of termination to the end of the quarter. The Client's investment advisory agreement with the Advisor is non-transferable without the Client's prior consent.

Use of Independent Managers – In the event that a Client should wish to terminate the services of an Independent Manager being utilized by the Advisor, the terms for termination will be set forth in the respective agreement between the Advisor and the Independent Manager. MKT Advisors will assist the Client with the transition as appropriate.

E. Compensation for Sales of Securities

MKT Advisors does not buy or sell securities to earn commissions and does not receive any compensation for securities transactions in any Client account, other than the investment advisory fees noted above.

However, Advisory Persons of MKT Advisors may also be licensed as independent insurance agents who can offer insurance products and services, for which they would receive a non-securities insurance commission, in their capacity as independent insurance agents.

If a Client purchases insurance from an Advisory Person in their capacity as insurance agent, the Advisory Person will typically receive a commission directly from the chosen insurance company. This may present a conflict of interest for MKT Advisors as the Advisory Person may have incentive to sell insurance for a commission. MKT Advisors mitigates this conflict by full disclosure to Clients, both verbal and written, and provides this Disclosure Brochure which Clients are encouraged to read carefully. Clients have the right to purchase any insurance product or service recommendation from other insurance brokers or agents. Insurance commissions you pay may be higher or lower when purchased through one of our Advisory Persons. Please also see item 10 below.

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

MKT Advisors does not charge performance-based fees for its investment advisory services. The fees charged by MKT Advisors are as described in Item 5 above and are not based upon the capital appreciation of the funds or

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securities held by any Client.

MKT Advisors does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

Item 7 – Types of Clients

MKT Advisors services the following types of Clients:

- Individuals and High Net Worth Individuals
- Trusts, Estates or Charitable Organizations and Foundations
- Pension and Profit-Sharing Plans
- Corporations, limited liability companies and/or other business types.

MKT Advisors generally welcomes new clients with portfolios in excess of \$100,000. However, in its sole discretion MKT Advisors may charge a lesser advisory fee or accept a new Client with lesser portfolio values based on certain criteria, such as pre-existing financial planning Clients, anticipated future earning capacity of the Client, anticipated future additional portfolio assets, related accounts, members of existing Client households or family members, etc.

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

A. Methods of Analysis

MKT Advisors primarily employs fundamental, technical, cyclical, and charting analysis methods in developing investment strategies for its Clients. Research and analysis from MKT Advisors are derived from numerous sources, including financial media companies, third-party research materials, Internet sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others.

Fundamental analysis utilizes economic and business indicators as investment selection criteria. This criterion consists generally of ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

Technical analysis involves the analysis of past market data rather than specific company data in determining the recommendations made to clients. Technical analysis may involve the use of charts to identify market patterns and trends, which may be based on investor sentiment rather than the fundamentals of the company. The primary risk in using technical analysis is that spotting historical trends may not help to predict such trends in the future. Even if the trend will eventually reoccur, there is no guarantee that MKT Advisors will be able to accurately predict such a reoccurrence.

Cyclical analysis is similar to technical analysis in that it involves the analysis of market conditions at a macro (entire market/economy) or micro (company specific) level, rather than the overall fundamental analysis of the health of the particular company that MKT Advisors is recommending. The risks with cyclical analysis are similar to those of technical analysis.

Charting analysis utilizes various market indicators as investment selection criteria. These criteria are generally pricing trends that may indicate movement in the markets. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the technical and charting analysis may lose value and may have negative investment performance. The Advisor monitors these market indicators to determine if adjustments to strategic allocations are appropriate.

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As noted above, MKT Advisors generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. MKT Advisors will typically hold all or a portion of a security for more than a year, but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, MKT Advisors may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector or asset class.

Independent Manager Analysis: The Advisor generally evaluates the experience, expertise, investment philosophies, and past performance of an Independent Manager to determine if the Independent Manager has demonstrated an ability to provide the appropriate investment approach needed for the Client's goals.

B. Risk of Loss

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. MKT Advisors will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

While the methods of analysis help the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in these methods of analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account[s]. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process.

The following are some of the risks associated with the Advisor's investment strategies:

Market Risks

The value of a Client's holdings may fluctuate in response to events specific to companies or markets, as well as economic, political, or social events in the U.S. and abroad. This risk is linked to the performance of the overall financial markets.

ETF Risks

The performance of ETFs is subject to market risk, including the possible loss of principal. The price of the ETFs will fluctuate with the price of the underlying securities that make up the funds. In addition, ETFs have a trading risk based on the loss of cost efficiency if the ETFs are traded actively and a liquidity risk if the ETFs has a large bid-ask spread and low trading volume. The price of an ETF fluctuates based upon the market movements and may dissociate from the index being tracked by the ETF or the price of the underlying investments. An ETF purchased or sold at one point in the day may have a different price than the same ETF purchased or sold a short time later.

Bond ETFs

Bond ETFs are subject to specific risks, including the following: (1) interest rate risks, i.e. the risk that bond prices will fall if interest rates rise, and vice versa, the risk depends on two things, the bond's time to maturity, and the coupon rate of the bond. (2) reinvestment risk, i.e. the risk that any profit gained must be reinvested at a lower rate than was previously being earned, (3) inflation risk, i.e. the risk that the cost of living and inflation increase at a rate

that exceeds the income investment thereby decreasing the investor's rate of return, (4) credit default risk, i.e. the risk associated with purchasing a debt instrument which includes the possibility of the company defaulting on its repayment obligation, (5) rating downgrades, i.e. the risk associated with a rating agency's downgrade of the company's rating which impacts the investor's confidence in the company's ability to repay its debt and (6) Liquidity Risks, i.e. the risk that a bond may not be sold as quickly as there is no readily available market for the bond.

Mutual Fund Risks

The performance of mutual funds is subject to market risk, including the possible loss of principal. The price of the mutual funds will fluctuate with the value of the underlying securities that make up the funds. The price of a mutual fund is typically set daily therefore a mutual fund purchased at one point in the day will typically have the same price as a mutual fund purchased later that same day.

Independent Managers

When investing with an Independent Manager, there is the risk that the Independent Manager may not be able to replicate its success in the future. In addition, as the Advisor does not control the underlying investments in an Independent Manager's portfolio, there is a risk that a manager may deviate from the stated investment mandate or strategy of the portfolio, making it a less suitable investment for the Client. Moreover, as the Advisor does not control the Independent Manager's daily business and compliance operations, the Advisor may not be aware of any lack of internal controls necessary to prevent business, regulatory or reputational deficiencies.

Options Contracts

Investments in options contracts have the risk of losing value in a relatively short period of time. Option contracts are leveraged instruments that allow the holder of a single contract to control many shares of an underlying stock. This leverage can compound gains or losses.

Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.

Item 9 – Disciplinary Information

There are no legal, regulatory or disciplinary events involving MKT Advisors or any of its management persons. MKT Advisors values the trust you place in the Advisor. The Advisor encourages Clients to perform the requisite due diligence on any advisor or service provider that the Client engages. The backgrounds of the Advisor and its Advisory Persons are available on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with the Advisor's firm name or CRD# 163833.

Item 10 – Other Financial Industry Activities and Affiliations

Insurance Agency Affiliations

As noted in Item 5, certain Advisory Persons are also licensed insurance professionals. Implementations of insurance recommendations are separate and apart from one's role with MKT Advisors. As an insurance professional, an Advisory Person may receive customary commissions and other related revenues from the various insurance companies whose products are sold. The Advisory Person is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by an Advisory Persons or the Advisor.

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

A. Code of Ethics

MKT Advisors has implemented a Code of Ethics (the "Code") that defines the Advisor's fiduciary commitment to each Client. This Code applies to all persons associated with MKT Advisors ("Supervised Persons"). The Code was developed to provide general ethical guidelines and specific instructions regarding the Advisor's duties to each

Client. MKT Advisors and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of MKT Advisors's Supervised Persons to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code covers a range of topics that address employee ethics and conflicts of interest. To request a copy of the Code, please contact the Advisor at (760) 658-8790 or via email at mkt@mktadvisorsllc.com.

B. Personal Trading with Material Interest

MKT Advisors allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. MKT Advisors does not act as principal in any transactions. In addition, the Advisor does not act as the general partner of a fund, or advise an investment company. MKT Advisors does not have a material interest in any securities traded in Client accounts.

C. Personal Trading in Same Securities as Clients

MKT Advisors allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities that are recommended (purchase or sell) to Clients presents a conflict of interest that, as fiduciaries, must be disclosed to Clients and mitigated through policies and procedures. As noted above, the Advisor has adopted the Code to address insider trading (material non-public information controls); gifts and entertainment; outside business activities and personal securities reporting. When trading for personal accounts, Supervised Persons have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material non-public information. This risk is mitigated by MKT Advisors requiring reporting of personal securities trades by its Supervised Persons for review by the Chief Compliance Officer ("CCO"). The Advisor has also adopted written policies and procedures to detect the misuse of material, non-public information.

D. Personal Trading at Same Time as Client

While MKT Advisors allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades are typically aggregated with Client orders or traded afterwards. **At no time will MKT Advisors, or any Supervised Person of MKT Advisors, transact in any security to the detriment of any Client.**

Item 12 – Brokerage Practices

A. Recommendation of Custodian[s]

MKT Advisors does not have discretionary authority to select the broker-dealer/custodian for custody and execution services. The Client will engage the broker-dealer/custodian (herein the "Custodian") to safeguard Client assets and authorize MKT Advisors to direct trades to the Custodian as agreed upon in the investment advisory agreement. Further, MKT Advisors does not have the discretionary authority to negotiate commissions on behalf of Clients on a trade-by-trade basis.

Where MKT Advisors does not exercise discretion over the selection of the Custodian, it may recommend the Custodian to Clients for custody and execution services. Clients are not obligated to use the Custodian recommended by the Advisor and will not incur any extra fee or cost associated with using a custodian not recommended by MKT Advisors. However, the Advisor may be limited in the services it can provide if the recommended Custodian is not engaged. MKT Advisors may recommend the Custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, and its reputation and/or the location of the Custodian's offices. MKT Advisors will generally recommend that Clients establish their account[s] at Charles Schwab & Co., Inc. ("Schwab"), a FINRA-registered broker-dealer and member SIPC. Schwab will serve as the Client's "qualified custodian". MKT Advisors maintains an institutional relationship with Schwab, whereby the Advisor receives economic benefits from Schwab. Please see Item 14 below.

Special Considerations for ERISA Clients – A retirement or ERISA Plan Client may direct all or part of portfolio transactions for its account through a specific broker or dealer to obtain goods or services on behalf of the Plan. Such direction is permitted provided that the goods and services provided are reasonable expenses of the Plan

incurred in the ordinary course of its business for which it otherwise would be obligated and empowered to pay. ERISA prohibits directed brokerage arrangements when the goods or services purchased are not for the exclusive benefit of the Plan. Consequently, we will request that Plan Sponsor, who directs Plan brokerage, provide us with a letter documenting any arrangements.

Following are additional details regarding the brokerage practices of the Advisor:

1. Soft Dollars - Soft dollars are revenue programs offered by broker-dealers/custodians whereby an advisor enters into an agreement to place security trades with a broker-dealer/custodian in exchange for research and other services. MKT Advisors does not participate in soft dollar programs sponsored or offered by any broker-dealer/custodian. However, the Advisor receives certain economic benefits from the Custodian. Please see Item 14 below.

2. Brokerage Referrals - MKT Advisors does not receive any compensation from any third party in connection with the recommendation for establishing an account.

3. Directed Brokerage - All Clients are serviced on a "directed brokerage basis", where MKT Advisors will place trades within the established account[s] at the Custodian designated by the Client. Further, all Client accounts are traded within their respective account[s]. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor's own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client's account[s]). MKT Advisors will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the Custodian.

B. Aggregating and Allocating Trades

MKT Advisors perform investment management services for various Clients. There are occasions on which portfolio transactions may be executed as part of concurrent authorizations to purchase or sell the same security for numerous accounts served by the Advisor, which involve accounts with similar investment objectives. Although such concurrent authorizations potentially could be either advantageous or disadvantageous to any one or more particular accounts, they are affected only when we believe that to do so will be in the best interest of the effected accounts. When such concurrent authorizations occur, the objective is to allocate the executions in a manner which is deemed equitable to the accounts involved. In any given situation, MKT Advisors attempts to allocate trade executions in the most equitable manner possible, taking into consideration Client objectives, current asset allocation and availability of funds using price averaging, proration and consistently non-arbitrary methods of allocation.

Item 13 – Review of Accounts

A. Frequency of Reviews

Securities in Client accounts are monitored on a regular and continuous basis by Taylor Jobe (Managing Partner and Chief Compliance Officer). Formal reviews are generally conducted at least annually or more frequently depending on the needs of the Client. Once the appropriate portfolio has been determined, an Advisory Person reviews the portfolio periodically and if necessary, rebalance the portfolio based upon the Client's individual needs, stated goals and objectives. The nature of these reviews is to learn whether the Client's accounts are in line with their investment objectives, appropriately positioned based on market conditions, and investment policies, if applicable.

B. Causes for Reviews

In addition to the investment monitoring noted in Item 13.A., each Client account shall be reviewed at least annually. Reviews may be conducted more frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account[s]. The Client is encouraged to notify MKT Advisors if changes occur in the Client's personal financial situation that might adversely affect the Client's investment plan. Additional reviews may be triggered by material market, economic or political events.

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C. Review Reports

The Client will receive brokerage statements no less than quarterly from the Custodian. These brokerage statements are sent directly from the Custodian to the Client. The Client may also establish electronic access to the Custodian's website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client's account[s]. MKT Advisors does not provide additional written reports to Clients, unless asked to do so.

Item 14 – Client Referrals and Other Compensation

A. Compensation Received by MKT Advisors

MKT Advisors may refer Clients to various unaffiliated, non-advisory professionals (e.g. attorneys, accountants, estate planners) to provide certain financial services necessary to meet the goals of its Clients. Likewise, MKT Advisors may receive non-compensated referrals of new Clients from various third-parties.

Participation in Institutional Advisor Platform

MKT Advisors has established an institutional relationship with Schwab through its "Schwab Advisor Services" unit, a division of Schwab dedicated to serving independent advisory firms like MKT Advisors. As a registered investment advisor participating on the Schwab Advisor Services platform, MKT Advisors receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets at Schwab. Services provided by Schwab Advisor Services benefit the Advisor and many, but not all services provided by Schwab will benefit Clients. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a custodian creates a potential conflict of interest since these benefits may influence the Advisor's recommendation of this custodian over one that does not furnish similar software, systems support, or services.

Services that Benefit the Client – Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of Client's funds and securities. Through Schwab, the Advisor may be able to access certain investments and asset classes that the Client would not be able to obtain directly or through other sources. Further, the Advisor may be able to invest in certain mutual funds and other investments without having to adhere to investment minimums that might be required if the Client were to directly access the investments.

Services that May Indirectly Benefit the Client – Schwab provides participating advisors with access to technology, research, discounts and other services. In addition, the Advisor receives duplicate statements for Client accounts, the ability to deduct advisory fees, trading tools, and back-office support services as part of its relationship with Schwab. These services are intended to assist the Advisor in effectively managing accounts for its Clients, but may not directly benefit all Clients.

Services that May Only Benefit the Advisor – Schwab also offers other services and support to MKT Advisors that may not benefit the Client, including: educational conferences and events, financial start-up support, consulting services and discounts for various service providers. Access to these services creates a financial incentive for the Advisor to recommend Schwab, which results in a potential conflict of interest. MKT Advisors believes, however, that the selection of Schwab as Custodian is in the best interests of its Clients.

B. Compensation for Client Referrals

Certain Clients may be referred to the Advisor by either an affiliated or unaffiliated party (herein "Promoter") and receive, directly or indirectly, compensation for the Client referral. In such instances, the Advisor will compensate the Promoter a fee in accordance with Rule 206(4)-1 of the Advisers Act and any corresponding state securities requirements. Any such compensation shall be paid solely from the investment advisory fees earned by the Advisor, and shall not result in any additional charge to the Client.

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Item 15 – Custody

Custody, as it applies to investment advisors, has been defined as having access or control over client funds and/or securities, but does not include the ability to execute transactions in client accounts. Custody is not limited to physically holding client funds and securities. If an investment advisor has the ability to access or control client funds or securities, the investment adviser may be deemed to have custody for purposes of the Investment Advisers Act of 1940 and must ensure proper procedures are implemented.

MKT Advisors is deemed to have limited custody of Client funds and securities whenever we are given the standing authority to have fees deducted directly from Client accounts, or if we service our Clients utilizing standing Client authority to send their funds upon their instructions to a third party (standing letter of authorization, or “SLOA”).

Clients generally do provide authority to MKT Advisors with the limited authority to transfer funds at their request to authorized third parties by using SLOAs. However, these requests and the authorization provided is written and verified. For accounts where we are deemed to have this limited custody, we have established procedures to ensure all Client funds and securities are held at a “qualified custodian” in a separate account for each Client under that Client’s name. Clients, or an independent representative of the Client, will direct, in writing, the creation of all accounts and therefore are aware of the qualified custodian’s name, address and the manner in which the funds or securities are maintained. Finally, account statements are delivered directly from the qualified custodian to each Client, or the Client’s independent representative, at least quarterly. Clients should carefully review those statements and are urged to compare the statements against any reports or investment summaries received from MKT Advisors. MKT Advisors encourages our Clients to discuss any questions with us about the custody, safety or security of their assets.

Item 16 – Investment Discretion

MKT Advisors generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by MKT Advisors. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client’s execution of an investment advisory agreement containing all applicable limitations to such authority. All discretionary trades made by MKT Advisors will be in accordance with each Client’s investment objectives and goals.

As discussed above, for certain Clients, MKT Advisors may recommend that Clients utilize one or more Independent Managers for all or a portion of a Client’s investment portfolio, based on the Client’s needs and objectives and the strategies offered by the Independent Manager. The strategies will align with the goals and objectives of the Client and the Independent Manager will have discretionary authority to trade on behalf of the Clients assets managed by such Independent Manager.

Item 17 – Voting Client Securities

MKT Advisors does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. If proxies are sent to MKT Advisors, we will forward them on to the Client and ask the party who sent them to mail them directly to you in the future. Clients may call, write or email us to discuss questions they may have about particular proxy votes or other solicitations. The Advisor will assist in answering questions relating to proxies, however, the Client retains the sole responsibility for proxy decisions and voting.

Item 18 – Financial Information

Neither MKT Advisors, nor its management, have any adverse financial situations that would reasonably impair the ability of MKT Advisors to meet all obligations to its Clients. Neither MKT Advisors, nor any of its Advisory Persons, have been subject to a bankruptcy or financial compromise. MKT Advisors is not required to deliver a balance

sheet along with this Disclosure Brochure as the Advisor does not collect advance fees of \$1,200 or more for services to be performed six months or more in the future.

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Form ADV Part 2B – Brochure Supplement

for

Taylor C. Jobe
Managing Partner and Chief Compliance Officer

Effective: February 2, 2024

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Taylor C. Jobe (CRD# 6555891) in addition to the information contained in the MKT Advisors LLC (“MKT Advisors” or the “Advisor”, CRD# 163833) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the MKT Advisors Disclosure Brochure or this Brochure Supplement, please contact us at (760) 658-8790 or by email at mkt@mktadvisorsllc.com.

Additional information about Mr. Jobe is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 6555891.

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Item 2 – Educational Background and Business Experience

Taylor C. Jobe, born in 1980, is dedicated to advising Clients of MKT Advisors as its Managing Partner and Chief Compliance Officer. Taylor Jobe attended the University of California, Santa Barbara, graduating in 2002 with a Bachelor of Business and Economics degree. Additional information regarding Mr. Jobe's employment history is included below.

Employment History:

Managing Member and Chief Compliance Officer, MKT Advisors LLC	12/2021 to Present
Financial Advisor, MKT Advisors LLC	10/2015 to 12/2021
Co-Founder, There Studios	02/2011 to 9/2015
New Media Communications, Thomson Reuters	01/2010 to 02/2011
Regional Business Manager, Thomson Reuters	08/2008 to 01/2010
Relationship Manager, Thomson Financial	04/2005 to 08/2008
Co-Founder, Dieselfx, Inc.	09/2002 to 03/2005

Item 3 – Disciplinary Information

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. **There are no legal, civil or disciplinary events to disclose regarding Mr. Jobe.** However, we do encourage you to independently view the background of Mr. Jobe on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 6555891.

Item 4 – Other Business Activities

Insurance Agency Affiliations

Mr. Jobe is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Jobe's role with MKT Advisors. As an insurance professional, Mr. Jobe will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Jobe is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Jobe or the Advisor. Mr. Jobe spends less than 10% of his time per month in this capacity.

Other Businesses

Mr. Jobe has additional business interests which each require less than 5% of his business time. Clients are not offered the services of these businesses.

- Manhattan Flight Club, LLC
- Harvest LLC

Item 5 – Additional Compensation

Mr. Jobe has additional business activities where compensation is received that are detailed in Item 4 above.

Item 6 – Supervision

Mr. Jobe serves as the Managing Partner and the Chief Compliance Officer of MKT Advisors and is supervised by Amanda Chapman, Client Service Manager. Ms. Chapman can be reached at (760) 658-8786 .

MKT Advisors has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of MKT Advisors. Further, MKT Advisors is subject to regulatory oversight by various agencies. These agencies require registration by MKT Advisors and its Supervised Persons. As a registered entity, MKT Advisors is subject to examinations by regulators, which may be announced

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or unannounced. MKT Advisors is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

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Form ADV Part 2B – Brochure Supplement

for

Marc L. Hodgkins
Financial Advisor

Effective: February 2, 2024

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Marc L. Hodgkins (CRD# 2196126) in addition to the information contained in the MKT Advisors LLC (“MKT Advisors” or the “Advisor”, CRD# 163833) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the MKT Advisors Disclosure Brochure or this Brochure Supplement, please contact us at (760) 658-8790 or by email at mkt@mktadvisorsllc.com.

Additional information about Mr. Hodgkins is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 2196126.

Item 2 – Educational Background and Business Experience

Marc L. Hodgkins, born in 1956, is dedicated to advising Clients of MKT Advisors as a Financial Advisor. Mr. Hodgkins attended San Francisco State University, graduating in 1984 with a Bachelor of Science degree in Business Administration and a minor degree in Business Information and Computing Systems (BICS).

Additional information regarding Mr. Hodgkins's employment history is included below.

Employment History:

Financial Advisor, MKT Advisors LLC	12/2021 to Present
Managing Partner and Chief Compliance Officer, MKT Advisors LLC	06/2012 to 12/2021
Financial Advisor, Morgan Stanley	08/2007 to 06/2012
Financial Consultant, AG Edwards & Sons, Inc.	01/1994 to 08/2007
Registered Representative, Dean Witter Reynolds, Inc.	01/1992 to 01/1994

Item 3 – Disciplinary Information

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. **There are no legal, civil or disciplinary events to disclose regarding Mr. Hodgkins.** However, we do encourage you to independently view the background of Mr. Hodgkins on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 2196126.

Item 4 – Other Business Activities

Insurance Agency Affiliations

Mr. Hodgkins is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Hodgkins's role with MKT Advisors. As an insurance professional, Mr. Hodgkins will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Hodgkins is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Hodgkins or the Advisor. Mr. Hodgkins spends less than 10% of his time per month in this capacity.

Item 5 – Additional Compensation

Mr. Hodgkins has additional business activities where compensation is received that are detailed in Item 4 above.

Item 6 – Supervision

Mr. Hodgkins serves as a Financial Advisor of MKT Advisors and is supervised by Taylor C. Jobe, Managing Partner and Chief Compliance Officer. Mr. Jobe can be reached at (760) 658-8790.

MKT Advisors has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of MKT Advisors. Further, MKT Advisors is subject to regulatory oversight by various agencies. These agencies require registration by MKT Advisors and its Supervised Persons. As a registered entity, MKT Advisors is subject to examinations by regulators, which may be announced or unannounced. MKT Advisors is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.



Form ADV Part 2B – Brochure Supplement

for

**Corinne D. Fond
Financial Advisor**

Effective: February 2, 2024

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Corinne D. Fond (CRD# 43792) in addition to the information contained in the MKT Advisors LLC (“MKT Advisors” or the “Advisor”, CRD# 163833) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the MKT Advisors Disclosure Brochure or this Brochure Supplement, please contact us at (760) 658-8790 or by email at mkt@mktadvisorsllc.com. Additional information about Ms. Fond is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with her full name or her Individual CRD# 43792.

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Item 2 – Educational Background and Business Experience

Corinne D. Fond, born in 1977, is dedicated to advising Clients of MKT Advisors as a Financial Advisor. Ms. Fond earned an MA in French Literature from Bryn Mawr College in 2001 and a BA in French and Computer Applications from University of Notre Dame in 1999. Additional information regarding Ms. Fond's employment history is included below.

Employment History:

Financial Advisor, MKT Advisors LLC	01/2022 to Present
Senior Portfolio Manager, Laurel Wealth Advisors, Inc. dba CF Advisory, LLC	08/2013 to 01/2022
Financial Advisor, Morgan Stanley Smith Barney	04/2009 to 08/2013

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Ms. Fond. Ms. Fond has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Ms. Fond.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Ms. Fond.***

However, we do encourage you to independently view the background of Ms. Fond on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with her full name or her Individual CRD# 43792.

Item 4 – Other Business Activities

Ms. Fond is dedicated to the investment advisory activities of MKT Advisors's Clients. Ms. Fond does not have any other business activities.

Item 5 – Additional Compensation

Ms. Fond is dedicated to the investment advisory activities of MKT Advisors's Clients. Ms. Fond does not receive any additional forms of compensation.

Item 6 – Supervision

Ms. Fond serves as a Financial Advisor with MKT Advisors and is supervised by Taylor Jobe, the Chief Compliance Officer. Mr. Jobe can be reached at 760-658-8790.

MKT Advisors has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of MKT Advisors. Further, MKT Advisors is subject to regulatory oversight by various agencies. These agencies require registration by MKT Advisors and its Supervised Persons. As a registered entity, MKT Advisors is subject to examinations by regulators, which may be announced or unannounced. MKT Advisors is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Privacy Policy

Effective: February 2, 2024

Our Commitment to You

MKT Advisors LLC ("MKT Advisors" or the "Advisor") is committed to safeguarding the use of personal information of our Clients (also referred to as "you" and "your") that we obtain as your Investment Advisor, as described here in our Privacy Policy ("Policy").

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. MKT Advisors (also referred to as "we", "our" and "us") protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

MKT Advisors does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Policy.

Why you need to know?

Registered Investment Advisors ("RIAs") must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

What information do we collect from you?

Driver's license number	Date of birth
Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number[s]	Income and expenses
E-mail address[es]	Investment activity
Account information (including other institutions)	Investment experience and goals

What Information do we collect from other sources?

Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

How do we protect your information?

To safeguard your personal information from unauthorized access and use we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client's personal information.

We require third parties that assist in providing our services to you to protect the personal information they receive from us.

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How do we share your information?

An RIA shares Client personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Do we share?	Can you limit?
Servicing our Clients We may share non-public personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting.	Yes	No
Marketing Purposes MKT Advisors does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where MKT Advisors or the client has a formal agreement with the financial institution. We will only share information for purposes of servicing your accounts, not for marketing purposes.	No	Not Shared
Authorized Users Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent[s] or representative[s].	Yes	Yes
Information About Former Clients MKT Advisors does not disclose and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our Clients.	No	Not Shared

State-specific Regulations

California	In response to a California law, to be conservative, we assume accounts with California addresses do not want us to disclose personal information about you to non-affiliated third parties, except as permitted by California law. We also limit the sharing of personal information about you with our affiliates to ensure compliance with California privacy laws.
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Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise this Policy and will provide you with a revised Policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (760) 658-8790 or via email at mkt@mktadvisorsllc.com.

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