

FIRM BROCHURE (Part 2A of Form ADV)

September 23, 2024



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This brochure provides information about the qualifications and business practices of Plato's Philosophy, LLC. If you have any questions about the contents of this brochure, please contact us at (805) 888-2024 and/or staff@stockhack.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.

Plato's Philosophy, LLC is registered as an investment adviser with the U.S. Securities and Exchange Commission, however, such registration does not imply a certain level of skill or training and no inference to the contrary should be made.

Additional information about Plato's Philosophy, LLC is also available on the SEC's website at www.adviserinfo.sec.gov.

ITEM 2: MATERIAL CHANGES

All sections of this firm brochure have been updated and most have been substantially rewritten to reflect *StockHack*'s new financial advisory and business consultation services. Information regarding these services along with the applicable fees are detailed below in the applicable sections.

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ITEM 4: ADVISORY BUSINESS

A. Description of Firm

Plato's Philosophy, LLC, DBA *StockHack* ("*StockHack*" or the "Firm"), previously doing business as *StackHack*, is a Ventura, California-based financial advisory firm founded in 2022. The Firm provides personalized investment advice to individuals, companies, and other investment advisers. As discussed in greater detail below, this advice encompasses aiding clients in defining their financial goals, addressing financial challenges, managing cash flow, devising tax strategies, reviewing insurance needs, planning for education expenses, crafting retirement strategies, and formulating estate and business plans. Within the spectrum of investment instruments, the Firm offers advisory expertise on various vehicles, including but not limited to mutual funds, exchange-traded funds ("ETFs"), equities, bonds, treasuries, options, real estate, and other investment vehicles. As for ETF advisory services, the Firm currently serves as a sub-adviser to The Meet Kevin Pricing Power ETF.

StockHack is currently registered with the Securities and Exchange Commission ("SEC") as an investment adviser and with the State of California as a limited liability company. The Firm is headquartered in Ventura, California while offering financial advisory services nationwide and is 100% owned by Kevin Paffrath.

B. Types of Advisory Services Offered

StockHack offers presently four types of financial advisory services: Financial Planning, Wealth Management, Business Consultation, and Exchange Traded Fund ("ETF") Sub-Advisor Services. Each of these services is described more fully below.

1. Financial Planning Services

Our Financial Planning Services encompass the creation and development of a personalized financial strategy, which includes tailored recommendations and review of relevant written documentation as needed. This service may also involve ongoing monitoring and checkpoints of the client's advancement toward the financial goals outlined in their plan. This financial planning may also include consultation regarding: wealth & portfolio strategy (stocks, bonds, insurance, and real estate); real estate acquisitions & dispositions; construction and renovation advice; retirement planning; college savings, SEP, Simple IRA, and HSA Plan Advice; wealth plans for your children under 18 years of age; property management advice; business entity advice and planning; and tax strategies planning. The specific scope of these services is established beforehand through mutual agreement between *StockHack* and the client. We expect 98% of client personal-wealth services to be covered by our monthly, Wealth Snowball fee. For extensive real estate portfolios, business consultations, or a deep-dive on specific securities, we may charge an additional fee, but only with the written consent of the client. There is no surprise billing. There are no commissions for trades. There are no hourly fees.

The process for delivering Financial Planning Services typically begins with gathering, organizing, and analyzing the client's pertinent information, including lifestyle, risk tolerance,

cash flow, and financial concerns or objectives. The main purpose of this process is to enable the Firm to help the client craft a strategy for managing their income, assets, and liabilities to meet their unique financial objectives. Since we offer a consultation relationship, we will start with clients on the most-important, best next step for their financial situation, rather than an overwhelming review upfront. As part of this approach, the Firm may also track the client's progress on an ongoing basis to ensure they are on course to meet their financial goals and recommend updated next-best goals on a periodic basis. Details on the fees for Financial Planning Services are outlined in Item 5: Fees and Compensation.

2. Wealth Management Services

We offer both discretionary and non-discretionary asset management and investment advisory services, designed to meet your individual needs and financial goals. When you engage us for wealth management services, we begin by meeting with you to understand your investment objectives, risk tolerance, and other relevant factors (known as "suitability information"). This information helps us craft a strategy that provides focused, ongoing investment advice or allows us to manage investments on your behalf and come up with your best next step. Once your investment portfolio is in place, we continuously monitor its performance and suggest rebalancing as necessary based on changes in the market or your financial situation.

For clients who choose discretionary management services, you will grant us the authority to make decisions regarding the specific securities to buy or sell in your account, without needing your prior approval for each transaction. This discretionary authority is typically provided through our investment advisory agreement and the relevant trading authorization forms. However, if you wish to place restrictions on this authority, such as limiting the types of securities we can purchase, you may provide those guidelines to us in writing. For clients opting for non-discretionary services, we will consult with you and obtain approval before executing any transactions.

At the beginning of our advisory relationship, a member of our team will conduct an in-depth interview to gather detailed information about your financial situation and investment objectives. Based on this, we will design a tailored investment strategy that aligns with your financial needs, time horizon, risk tolerance, and goals and focus specifically on the best next step for you. Our recommendations typically include a diverse portfolio of investments, such as no-load mutual funds, stocks, bonds, and other suitable securities. We will review your portfolio periodically to ensure it remains aligned with your objectives. Details on the fees for Wealth Management Services are outlined in Item 5: Fees and Compensation.

We also offer clients the ability to receive wealth management advisory services for their portfolio without transferring their assets to our financial partners. Instead, we will either: (1) help calibrate clients' ongoing portfolios, inclusive of our Wealth Snowball fee, or (2) for portfolios that require frequent, transformative changes, we may assess a one-time fee to review portfolios we do not manage. This review would only commence upon written acceptance of the client. For an avoidance of doubt, for those whose assets we manage, there are no portfolio review fees other than the assets under management ("AUM") fee. This gives clients greater

flexibility in choosing which fee structure they would prefer to utilize with our services without having to first transfer all of their assets under our management.

3. Business Consulting Services

We offer comprehensive business analysis and consulting services to help companies enhance their overall performance, efficiency, and growth potential. We will take a close look at your business and identify areas where improvements can be made and strategies can be implemented to support your objectives. Whether you are looking to refine your operations, explore growth opportunities, or streamline your processes, our team will provide tailored insights to help you achieve your goals.

Our consulting services are flexible and designed to address any aspect of your business that you wish to focus on. Whether it is improving efficiency, increasing profitability, or expanding further into new or current markets, we work with you to develop actionable solutions that make sense for your company. Our goal is to support your business in becoming more efficient, competitive, and positioned for long-term success. Details on the fees for the Business Consulting Services are outlined in Item 5: Fees and Compensation.

4. ETF Sub-Advisory Services

StockHack serves as the sub-advisor to The Meet Kevin Pricing Power ETF. The Firm provides advisory services related to trades, fund diversification, and future market planning for the ETF. This service is not offered to the general public.

C. Client Customization of *StockHack*'s Advisory Services

StockHack's services are customizable based on the wants and needs of its clients.

The Financial Planning Services will be molded around the client's goals and catered toward leading them toward a path designed to help build wealth.

The Wealth Management Services clients will be able to indicate the level of discretion that *StockHack* shall have over their accounts, if any at all. This includes the ability to specifically restrict our advisers from investing in certain sectors or securities. These goals and restrictions will be discussed with the client at the beginning of the relationship, and the client will be permitted to alter them at any time with written notice. For clients choosing to only receive advisory services and not hands-on management services, they can also direct our advisers to only focus on a specific portion of their portfolio or only analyze those specific portions that are desired.

The Business Consulting Services can be customized and tailored toward any portion of the client's business or objectives that they wish it to be directed. Our advisers will strive to fulfill any analysis that the client desires for its business and provide a plan with actionable steps.

The ETF Sub-Advisory Services are not customizable as they are not offered to the public and are only offered to another investment advisory company through an independent sub-advisor agreement for the specific purpose of advising regarding the portfolio management of The Meet Kevin Pricing Power ETF.

D. Wrap Fee Programs

StockHack does not provide portfolio management services to any wrap fee programs, as that term is defined in the instructions to Form ADV Part 2.

E. Managing Client Assets

StockHack intends to begin managing client assets on October 1, 2024. The Firm does not currently manage any client assets on a discretionary or non-discretionary basis.

However, the Firm is a sub-adviser to Toroso Investments, LLC for The Meet Kevin Pricing Power ETF. As disclosed in Item 5(D) of the Firm's Form ADV Part 1, the ETF Fund currently has approximately \$40,120,000 assets under management as of September 12, 2024.

ITEM 5: FEES AND COMPENSATION

A. Advisory Fees

Prior to engaging *StockHack* to provide any services, the client will be required to enter into a written client agreement with the Firm, setting forth the terms and conditions and fees under which it will render its services. Fees may be subject to negotiation under certain circumstances as agreed on by the Firm and the client. The following schedule of fees outlines the typical fee structure under which the Firm renders its services. The actual schedule of fees, as it applies to a particular client, will be clearly outlined in the client agreement. Please note that these fees are subject to change and will be updated overtime as the Firm's business progresses. All clients will be provided with a minimum of thirty days' notice of any increase in fees and will be provided an opportunity to terminate their contracts prior to any fee increase should they choose to do so upon receiving such notice.

– Introductory Fee for All Services (Join Fee)

To enroll as a client with *StockHack*, all clients will be required to pay an introductory setup fee of \$1,337.00 (Join Fee). Thereafter, clients will be billed according to the following fees:

1. Fees for Financial Planning Services (Wealth Snowball Fee)

StockHack charges each client an ongoing flat rate fee of \$420/month for a client to receive Financial Planning Services. This fee is required for all clients receiving financial or wealth management advisory services.

2. Fees for Wealth Management Services

In addition to the financial planning services fee, *StockHack* charges each wealth management client an annual fee of 0.69% of the client's gross assets under management with the Firm. Alternatively, clients can choose to receive wealth management advisory services without actually having the Firm's advisers manage their assets. However, this may be subject to a separate fee, agreed upon in writing, depending on the nature of the changes in the portfolio from the last review during The Wealth Snowball consultation.

3. Fees for Business Consulting Services

There is no set fee that *StockHack* charges for this service. *StockHack* advisers will meet with any potential clients to assess what type of consulting they are seeking and will establish a fee as agreed upon by the parties prior to the Firm beginning to provide services.

4. Fees for ETF Sub-Advisor Services

StockHack receives 0.02% of the assets under management for The Meet Kevin Pricing Power ETF annually as part of its sub-advisory services. This fee is included as part of the annual 0.77% expense ratio for the ETF. The Firm also receives any funds remaining from the expense ratio after all other costs and fees have been deducted.

B. Billing Method

The introductory setup fee and any monthly fees will be charged to the client upon signing up for any *StockHack* services prior to any services being rendered. Monthly fees shall be due and payable each month, proceeding from the original date of sign-up and shall be charged to the client's selected payment method through the Firm's selected third-party payment processor.

Any annual fees based on the client's assets under management with the Firm shall accrue and be owed every month following the client's funds first beginning to be managed by the firm.

Any other fees, such as hourly consulting fees, shall be due and payable upon the completion of the services. The client shall be invoiced accordingly and shall be able to pay any such fees through the Firm's third-party payment processor.

Clients will be provided with various electronic methods to pay for the above services through Stripe or another third-party payment processor. Clients may be charged an additional payment transfer fee by Stripe or another third-party payment processor based on the method of payment that they choose. The client will be responsible for checking any and all transfer fees prior to initiating any payments. The Firm may or may not at its election choose to pay any such transfer fees from the funds it receives rather than the client. The client shall be informed of any such applicable fees prior to completion of their payment.

Fees can also be deducted from the client's assets under management with the Firm at the client's election and permission. Any such arrangements will be agreed upon and authorized in writing by the client prior to any such occurrence.

The Firm receives its fees for The Meet Kevin Pricing Power ETF according to the distribution schedule of the investment adviser that it advises for the ETF.

C. Other Fees and Expenses

The Firm does not currently have any other fees or expenses that the client is expected to pay for the above-mentioned services other than those mentioned herein.

D. Termination of Services

Clients may terminate services at any time with *StockHack*. Any terminated services shall continue until the end of the current billing period. Any remaining fees shall become due and payable immediately upon requested termination. Any services that clients have already paid for will be rendered until completed.

Once any revocation period provided in the client's agreement with the Firm has elapsed, if any, the one-time, introductory setup fee shall be non-refundable. Any and all other fees shall be non-refundable once they have accrued and are owed to the Firm based on the client's agreement with the Firm.

E. No Compensation For Sale of Securities

StockHack does not accept compensation for the sale of securities or other investment products.

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

StockHack does not accept performance-based fees.

ITEM 7: TYPES OF CLIENTS

StockHack generally provides investment advice to individuals, companies, investment companies, and investment advisers. The Firm does not have any minimum balance requirements to open an account with the firm. However, the Firm's advisers will hold an initial evaluation appointment with the client to ensure the Firm is a good fit for the client and their goals and does reserve the right to deny a client's application to enroll with the Firm. Additionally, the Firm maintains the right to terminate a client's account if it falls below a minimum size which, in its sole opinion, is too small to effectively manage.

ITEM 8: METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

A. Methods of Analysis

StockHack employs a distinctive approach for financial advice. The Firm harnesses fundamental analysis, scrutinizes economic variables encompassing money supply, diverse interest rates, and commodity valuations, all contributing to its projection of forthcoming economic landscapes. These insights intricately inform the Firm's strategic asset allocation choices and the curation of investments tailored to specific portfolios. Moreover, the Firm diligently factors in the influence of political dynamics where they intersect with the broader economic landscape. As the Firm navigates this readily shifting environment, it is essential for the Firm's clients to recognize the inherent risk associated with securities investment, requiring a willingness to bear potential losses.

B. Investment Strategies

At the core of the Firm's approach to translating investment insights into actionable guidance lies its central strategy of asset allocation. Guided by a blend of meticulous economic projections and individual client preferences – encompassing sought-after returns, risk sensitivity, investment timeline, tax considerations, and distinct limits – the Firm skillfully orchestrates a diverse array of investments across various asset classes and styles. This harmonious mix is tailor-made to align with each client's unique financial goals, crafting a roadmap that resonates with aspirations and constraints.

C. Risk of Loss

Investing in securities inherently entails a notable risk of loss, with all investments carrying specific risks that investors must bear. The Firm's analytical methods and investment strategies are meticulously crafted to incorporate a vigilant awareness of potential loss. It is crucial for clients to be well-versed in various risks, including but not limited to:

Interest-Rate Risk: The ebb and flow of interest rates can trigger fluctuations in investment prices. For instance, rising interest rates can render existing bonds less appealing, leading to a decline in their market values.

Market Risk: External events and conditions, both tangible and intangible, can lead to price drops in stocks, bonds, mutual funds, and other securities. This type of risk is independent of a security's specific underlying circumstances.

Inflation Risk: The erosion of purchasing power due to inflation means that a dollar today won't stretch as far as a dollar next year.

Currency Risk: Investments in foreign markets are exposed to shifts in the dollar's value relative to the originating country's currency, also known as exchange rate risk.

Political and Legislative Risks: The intricate interplay of laws and circumstances in various countries where companies operate can change swiftly and dramatically, impacting businesses, particularly those operating beyond U.S. borders.

Reinvestment Risk: There's a risk that future investment proceeds might need to be reinvested at a lower rate of return, especially concerning fixed income securities.

Business Risk: Industry-specific or company-specific risks are at play here. For instance, oil-drilling companies must navigate the lengthy process of discovering and refining oil before generating profits, in contrast to electric companies with a steadier income stream.

Liquidity Risk: Liquidity, the ease of converting investments into cash, is influenced by the level of interest in a standardized product. Treasury Bills exemplify high liquidity, while real estate properties lack it.

Financial Risk: Excessive borrowing to fund operations amplifies profitability risks, as companies must meet obligations during good and challenging times. Failing to meet loan obligations during financial stress can lead to bankruptcy and market value decline.

These insights underscore the Firm's dedication to ensuring clients are well-informed about the multifaceted risks inherent in investment endeavors.

ITEM 9: DISCIPLINARY INFORMATION

Kevin Paffrath, President and CEO of *StockHack*, is currently a named defendant in a class action lawsuit filed in the United States District Court for the Southern District of Florida. The class is seeking to hold spokesperson(s) liable for the performance of a vehicle that advertised on Mr. Paffrath's YouTube channel. The class alleges that the advertised product is a security and that spokesperson(s) are liable for the performance of the product under Florida securities laws. Mr. Paffrath denies any liability under such strained and novel legal theories and is seeking all possible means of dismissing the lawsuit. A settlement has been agreed upon for the case and is awaiting court approval.

Kevin Paffrath, President and CEO of *StockHack*, entered into a Consent Order with The Department of Financial Protection and Innovation of the State of California on September 13, 2023. The department alleged that Mr. Paffrath performed unlicensed investment adviser activities in violation of California Corporations Code section 25230 from at least May 30, 2021 through June 26, 2021 during fundraising livestreams that Mr. Paffrath held on his YouTube channel for his campaign for California Governor. Mr. Paffrath entered into the Consent Order to settle the matter without either admitting or denying that he had violated any California law or regulation. As part of the Consent Order, Mr. Paffrath agreed to desist and refrain from any unlicensed investment adviser activities and to pay an administrative penalty of \$5,000.00. Mr. Paffrath passed his Series 65 examination back in September 2022, certifying him to be a licensed investment adviser representative.

ITEM 10: OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

Neither the Firm nor any of its management persons are currently registered as a broker-dealer or a registered representative of a broker-dealer. However, Kevin Paffrath, President and CEO of *StockHack*, does currently have a pending registration with FINRA to have a new corporate entity, SuitHack, LLC, to be registered as a broker-dealer. This application is still pending with FINRA.

Neither the Firm nor any of its management persons are registered as a future commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.

Kevin Paffrath, President and CEO of *StockHack*, is a registered real estate agent and broker in the State of California. Mr. Paffrath is also the CEO of House Hack, Inc., a real estate start up company that raises capital from investors and seeks to invest that capital in real estate across the United States of America. It is unlikely that these items will create a conflict of interest between *StockHack* and any of its clients, however, Mr. Paffrath will likely be using his knowledge, background, and experience in these areas as part of giving financial advice to clients, especially in relation to buying and selling real estate. There may also arise a situation in which a client could have the opportunity to purchase shares of House Hack, Inc. Should such an occasion arise, the client would be provided complete disclosure of all risks associated with the investment, which would be applicable to all potential investors and not just said client.

StockHack has an ongoing business relationship with Robert W. Carey, CPA. Mr. Carey is a licensed Certified Public Accountant in the State of California. Mr. Carey advises *StockHack* regarding tax matters and also advises Mr. Paffrath in his other businesses, including being the Secretary and Treasurer for House Hack, Inc. This business relationship is not anticipated to create any conflict of interest with the Firm's clients.

StockHack has an ongoing business relationship with Kenneth E. Traynham, Esq. Mr. Traynham is a licensed attorney in the State of California and the State of Texas and currently serves as the Firm's Chief Legal Officer and Chief Compliance Officer. This business relationship is not anticipated to create any conflict of interest with the Firm's clients.

The Firm does not recommend or select other investment advisers for its clients nor does it receive compensation directly or indirectly for recommending or selecting other investment advisers.

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

A. Code of Ethics Summary

The principals and staff of *StockHack* have adopted a Code of Ethics for the purpose of instructing its personnel in their ethical obligations and to provide rules for their personal

securities transactions. The Firm owes a duty of loyalty, fairness, and good faith towards its clients and the obligation to adhere not only to the specific provisions of the Code but to the general principles that guide the Code. The Code of Ethics covers a range of topics that may include: general ethical principles, receipt and giving of gifts, reporting personal securities trading, exceptions to reporting securities trading, reportable securities, initial public offerings and private placements, reporting ethical violations, distribution of the Code of Ethics, review and enforcement processes, amendments to Form ADV and supervisory procedures. We will provide a copy of the Code of Ethics to any client or prospective client upon request.

B. Interest and/or Participation in Financial Advisory Recommendations

Based upon a client's stated objectives, *StockHack* may, under certain circumstances, recommend the purchase or sale of securities in which the Firm and/or its affiliates have an interest. Such recommendations will only be made to the extent that they are reasonably believed to be in the best interests of the client. Additionally, as part of *StockHack*'s fiduciary duty to clients, the Firm and its associated persons have a duty to at all times put the interests of the clients first, and at all times are required to adhere to the Firm's Code of Ethics.

The Firm's principals and staff may have positions in securities that it also recommends to clients. *StockHack*'s recommendations to clients may differ from client to client, based on each client's unique circumstances and financial goals. The Firm may also recommend purchase of a security for one client while recommending the sale of that security for another. However, as a fiduciary, *StockHack* has a duty to act for the benefit of its clients and place clients' interests before its own. Client recommendations have priority over interests in securities and other investments of which our principals and staff may own. Principals and staff must adhere to the Firm's Personal Trading Policy at all times.

To help mitigate any real or potential conflicts of interest associated with these practices, the compliance department of *StockHack* reviews employee trades involving reportable securities each quarter and holding reports annually. The personal trading reviews help ensure that the personal trading of employees does not affect the markets, and that clients of the Firm receive preferential treatment. Since most employee trades are small mutual fund trades, exchange-traded fund trades, and large cap publicly-listed company trades, the transactions generally do not affect the securities markets or adversely impact clients. It should be noted that under the Firm's Code of Ethics, employees of the Firm are not required to report transactions involving open-ended mutual funds to the Firm's compliance department and some employees may hold outside brokerage accounts consisting of non-reportable securities, which consequently are not subject to the compliance department's quarterly transactions review.

ITEM 12: BROKERAGE PRACTICES

StockHack recommends the brokerage and custodial services of J.P. Morgan ("JPM") and Interactive Brokers, LLC ("IBKR") (independently and collectively referred to as a "Custodian"). Your assets must be held in an account with a "qualified custodian," typically a

broker-dealer or bank. Due to the value of the services provided by these custodians, you may incur higher commissions or trading costs compared to other options available in the market.

Our goal is to recommend a custodian/broker that will hold your assets and facilitate transactions on terms that are, overall, the most favorable when considering available options and services. In making our recommendation, we evaluate several factors, including: the ability to buy and sell securities for your account or assist in facilitating such transactions; the likelihood of successful trade execution; access to investment research and tools; quality of overall services; competitiveness of pricing; reputation, financial strength, and stability; and existing relationship with our firm and other clients.

Research and Other Soft Dollar Benefits

We do not receive any additional brokerage products or services that would be considered paid for through "soft dollars."

Economic Benefits

As a registered investment adviser, we have access to the institutional platform of your account custodian, which allows us to utilize various research products and services. These resources may include financial publications, information on specific companies and industries, research software, and other tools that assist us in making informed investment decisions. These research products and services are made available to all investment advisers using the institutional platforms of these custodians and are not considered to be paid for with soft dollars. However, it's important to note that the commissions charged by a particular broker for a given transaction or set of transactions may be higher than those charged by a broker who does not offer such research products or services.

J.P. Morgan Adviser Services

Depending on the size and circumstances of a client's account, *StockHack* clients may have the opportunity to open a brokerage account with J.P. Morgan. There are no set parameters for this selection, and it will be determined by JPM on a client-by-client basis. *StockHack* cannot guarantee that JPM will permit any of its clients to open an account. Any selected clients will be provided with the appropriate paperwork and disclosures for JPM prior to opening any such accounts and will be subject to all account, commission, and other fees that JPM charges its clients. Additional information regarding this option shall be provided to the client if JPM selects to grant them an opportunity to open an account.

Interactive Brokers Adviser Services

IBKR does not charge a fee to custody assets and does not have a minimum balance requirement. It does however charge commissions, mark-ups, and mark-downs as part of its services as a broker-dealer along with other financing charges depending on the type of account you open with them and the size of your transactions. Clients opening an account with IBKR will be provided with the applicable paperwork to review and complete prior to opening an account with IBKR and will be able to personally assess whether they desire to proceed with opening the account and granting *StockHack* discretion, if any, to trade within their account. Additional information about IBKR's pricing can be found at:

<https://www.interactivebrokers.com/en/pricing/commissions-home.php>

Brokerage for Client Referrals

We do not receive client referrals from broker-dealers in exchange for cash or other compensation, such as brokerage services or research.

Directed Brokerage

We typically require that you direct us to execute transactions through JPM or IBKR. As a result, we may not always be able to obtain the most favorable terms for your transactions, and you may incur higher brokerage commissions compared to using another broker-dealer offering similar services. Not all advisers require their clients to direct brokerage in this way.

Aggregated Trades

In most cases, transactions for each client are executed independently, unless we determine it is beneficial to buy or sell the same securities for multiple clients at the same time. We may, but are not obligated to, combine orders for the same security across different advisory accounts we manage, a process known as "aggregated trading." When trades are aggregated, shares are distributed fairly and equitably among participating accounts. Generally, each account pays a fixed transaction cost regardless of the number of shares transacted. In some instances, participating accounts will pay an average price per share and a proportionate share of transaction costs for the day's trades. If an order is only partially filled, shares will be allocated fairly, typically in proportion to the size of each client's order. Accounts owned by our firm or our associates may participate in aggregated trades alongside your accounts, but they will not receive preferential treatment.

While we combine orders for discretionary accounts, we do not do so for non-discretionary accounts. As a result, non-discretionary accounts may incur different transaction costs compared to discretionary accounts. If you have a non-discretionary arrangement with our firm, we may not be able to execute trades in the same quantities as discretionary clients, which could result in higher commissions, fees, or transaction costs for you.

ITEM 13: REVIEW OF ACCOUNTS

For investment management services, your account is reviewed at a minimum of once per quarter. Additionally, the representative handling your account will aim to conduct a formal review with you at least once a year.

Extra reviews may occur under certain circumstances, such as: deposits or withdrawals, year-end tax considerations, significant market events, specific events related to individual securities, and/or changes in your investment goals or risk tolerance.

We do not provide additional or routine written reports as part of the account reviews. However, you will receive trade confirmations and monthly or quarterly statements directly from your account custodian(s).

ITEM 14: CLIENT REFERRALS AND OTHER COMPENSATION

We may receive financial benefits from non-affiliated third parties in the form of sponsorships or marketing reimbursements. As part of our commitment to acting in the best interest of our clients, we always strive to prioritize your needs. Although these benefits do not influence the investment advice we provide, we disclose this information because receiving economic benefits from a non-client creates a potential conflict of interest. This arrangement does not result in any additional transaction fees for you beyond the typical charges from our firm or other service providers.

Please refer to the Brokerage Practices section above for details on any research or other benefits we may receive due to our relationship with your account custodian.

Client Referral Compensation Arrangements with Employees

We have agreements in place with certain employees of our firm, under which they receive compensation for bringing in new clients. These employees must adhere to the regulatory requirements of the jurisdictions in which they operate. Their compensation is a percentage of the advisory fees you pay to our firm, for as long as you remain a client or until the agreement with the Solicitor ends. You will not incur any additional fees because of this arrangement. Since the compensation is based on you entering into an advisory agreement with us, the individual referring you has a financial incentive to recommend our firm. This creates a potential conflict of interest, but you are under no obligation to use our firm's services. Similar services or lower fees may be available from other firms.

Employee Fee-Sharing Arrangements

We have agreements in place where certain employees of our firm may receive a portion of the fees paid by clients they service or refer. These arrangements are based on the advisory fees paid by the client and may continue for the duration of the client relationship or until the agreement with the employee ends. There are no additional costs to the client as a result of these arrangements. However, since the compensation is tied to the client's engagement with our firm, the employee may have a financial incentive to recommend our services. While this creates a potential conflict of interest, we remain committed to acting in your best interest at all times. You are not obligated to use our firm's services, and comparable services or lower fees may be available through other providers.

Third-Party Payment Processor and Buy Now, Pay Later Service Benefits

For your convenience, we may offer the option to process payments through third-party payment processors or buy now, pay later services. Please note that these services are provided by independent third parties and are not affiliated with our firm. While we aim to select reputable providers and strive to review their policies at least annually, we do not have control over their policies, fees, or terms of service. Any agreements you enter into with these providers are separate from our relationship with you, and the use of these services may result in additional fees or charges, which are set by the third-party provider.

The availability of these payment options is for your convenience and does not influence the services or advice we provide. We encourage you to review the terms and conditions of any

third-party payment service to ensure it meets your needs. Our firm is not responsible for any issues arising from your use of these services.

ITEM 15: CUSTODY

We directly deduct our advisory fees from your account(s). This authorization to withdraw fees grants us limited custody over your funds, though we do not have physical possession of any funds or securities. Your assets will be held by an independent, qualified custodian, such as a bank or broker-dealer. You will receive account statements from your custodian(s) at least quarterly, which will detail the fees deducted from your account(s) during each billing period. We encourage you to carefully review these statements for accuracy. Should you have any questions or if you do not receive a statement, please contact us at (805) 888-2024.

In certain instances, individuals affiliated with our firm may serve as trustees for accounts to which we provide advisory services. These individuals are appointed as trustees due to personal or familial relationships with the grantor or beneficiary of the trust, not due to their role with our firm. As such, we do not have custody over these accounts.

ITEM 16: INVESTMENT DISCRETION

You may give our firm the discretion to decide which securities and the amounts to buy or sell for your account(s) without needing your approval for each transaction. We may, however, allow you to limit this authority (for example, by restricting certain types of securities or sectors) on a client-by-client basis so long as you provide us with your preferences in writing. Under such an arrangement, we will honor your restrictions, and you will be permitted to update these restrictions at any time by submitting updated instructions in writing. For more details about our discretionary management services, please refer to the Advisory Business section (Item 4) of this brochure.

If you choose a non-discretionary arrangement with us, we will always seek your approval before making any transactions on your behalf. You also have the full right to decline any recommendations we provide under a non-discretionary agreement.

ITEM 17: VOTING CLIENT SECURITIES

Wealth Management Services

If *StockHack* provides you with wealth management services, please note that we do not vote proxies on behalf of your advisory accounts. However, upon request, we can offer guidance on corporate actions and how to exercise your proxy voting rights. If you hold common stock or mutual fund shares, it will be your responsibility to exercise your shareholder voting rights.

Typically, proxy materials will be sent to you directly by your account custodian. In the rare instance that we receive any proxy materials on your behalf, we will promptly forward them to

you via mail, unless you have specifically authorized us to contact you via electronic mail, which, in that case, we will forward any such proxy materials to you electronically.

ETF Sub-Advisor Services

As sub-advisor to The Meet Kevin Pricing Power ETF, *StockHack* does not presently vote proxies for the ETF. This is subject to change in the future. This firm brochure will be updated accordingly upon any such change, and you shall be notified and receive an updated copy to review.

ITEM 18: FINANCIAL INFORMATION

StockHack does not require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance and therefore is not required to provide, and has not provided, a balance sheet. Furthermore, the Firm does not have any financial commitments that may impair its ability to meet contractual and/or fiduciary obligations to clients. Finally, the Firm has not been the subject of a bankruptcy proceeding.

ITEM 19: REQUIREMENTS FOR STATE-REGISTERED ADVISERS

StockHack is registered with the SEC and is therefore not required to respond to this item.

ITEM 20: ADDITIONAL INFORMATION

Protecting Your Privacy

Safeguarding your personal information is a top priority for us. In compliance with applicable privacy laws, we have established policies and procedures to keep your information secure and confidential. We do not share your nonpublic personal information with unaffiliated third parties, except as permitted by law. During the process of managing your account, we may need to share certain details with service providers, such as transfer agents, custodians, broker-dealers, accountants, consultants, and attorneys.

Access to your personal information within our firm is limited to employees who require it to provide services to you. We uphold strict physical and procedural safeguards in line with regulatory standards to protect the confidentiality and security of your personal data. Rest assured, we will never sell your personal information or details about your accounts to anyone.

Client's personal information may be shared with affiliated companies or companies under common control with *StockHack*, and clients may receive promotional communications from these companies. However, clients will always have the option to opt-out of any ongoing communications with any such companies.

By enrolling with *StockHack*, clients acknowledge and accept that details of their financial situations may be discussed in a broad general sense for hypothetical or example scenarios in

public educational materials in addition to statistical information published by the Firm or its affiliates. Nevertheless, under no circumstances will clients' confidential or personally identifiable information ever be permitted to be publicly disclosed, except as required by law.