

# Nytrx LLC

## Firm Brochure - Form ADV Part 2A

This brochure provides information about the qualifications and business practices of Nytrx LLC (“Nytrx”, “us”, “we”, or “our”). If you have any questions about the contents of this brochure, please contact us at (832) 827-3883 or by email at: [support@nytrx.com](mailto:support@nytrx.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.

Nytrx is a registered investment advisor. Registration as an investment adviser does not imply a certain level of skill or training.

Additional information about Nytrx is also available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).  
Nytrx LLC’s CRD number is: 312141.

18022 Grotto Point Dr  
Cypress, TX 77429  
(832) 827-3883  
[support@nytrx.com](mailto:support@nytrx.com)  
<https://nytrx.com/>

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## Item 2: Material Changes

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Since filing the last annual amendment to this Firm Brochure – Form ADV Part 2A (dated 2/1/2023), the following material changes have been made:

- The minimum to open or convert an account is \$5,000.
- The advisory fee is \$0.5% annually of the funds we manage.

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## **Item 4: Advisory Business**

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### **A. Description of the Advisory Firm**

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Nytrx LLC is a Limited Liability Company organized in the State of Delaware. The firm was formed in May 2010. The firm was registered with the SEC as an Investment Adviser in 2021. The principal owner is Quenton Nolte.

### **B. Types of Advisory Services**

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We offer several automated investment management strategies consisting of portfolio families of ETFs and Stocks. Our services are provided through an interactive website using computer-based models and applications to collect your information and provide investment advice.

To determine your financial situation and investment objectives, we will need to obtain certain information from you through our interactive website. You will be responsible for providing any changes to your financial situation or investment objectives by updating your responses on our interactive website.

The client's portfolios are held in a brokerage account opened by the client at Charles Schwab & Co., Inc. ("CS&Co").

You must appoint our firm as your investment adviser of record on specified accounts (collectively, the "Account"). The Account consists only of separate account(s) held by CS&Co under your name which serves as qualified custodian and broker/dealer. As qualified custodian, CS&Co, maintains physical custody of all funds and securities of the Account, and you retain all rights of ownership (e.g., right to withdraw securities or cash, exercise or delegate proxy voting and receive transaction confirmations) of the Account. Please see Item 12 – Brokerage Practices for more information regarding CS&Co.

It is important that you understand that we manage investments for other clients and can give them advice or take actions for them or for our personal accounts that is different from the advice we provide to you, or actions taken for you. We are not obligated to buy or sell to you any security or other investment that we can buy or sell for any other clients or for our own accounts.

Conflicts arise in the allocation of investment opportunities among accounts that we manage. We strive to allocate investment opportunities believed to be appropriate for your account(s) and other accounts advised by our firm among such accounts equitably and consistent with the best interests of all accounts involved. However, there can be no assurance that a particular investment opportunity that comes to our attention will be allocated in any particular manner. If we obtain material, non-public information about a security or its issuer that we may not lawfully use or disclose, we have absolutely no obligation to disclose the information to any client or use it for any client's benefit.

#### **ETF Automated Investment Strategies**

We offer an automated investment program (the "Program") through which clients are invested in a range of investment strategies we have constructed and manage, each consisting of a portfolio of exchange-traded funds and a cash allocation.

The client can instruct us to exclude up to three Funds from their portfolio. We use the Institutional Intelligent Portfolios® platform (“Platform”), offered by Schwab Performance Technologies (“SPT”), a software provider to independent investment advisors and an affiliate of CS&Co., to operate the Program. We are independent of and not owned by, affiliated with, or sponsored or supervised by SPT, CS&Co., or their affiliates (together, “Schwab”).

We, and not Schwab, are the client’s investment advisor and primary point of contact with respect to the Program. We are solely responsible, and Schwab is not responsible, for determining the appropriateness of the Program for the client, choosing a suitable investment strategy and portfolio for the client’s investment needs and goals, and managing that portfolio on an ongoing basis. We have contracted with SPT to provide us with the Platform, which consists of technology and related trading and account management services for the Program. The Platform enables us to make the Program available to clients online and includes a system that automates certain key parts of our investment process (the “System”).

The System includes an online questionnaire that can help us determine the client’s investment objectives and risk tolerance and select an appropriate investment strategy and portfolio. Clients should note that, if we use the online questionnaire, we will recommend a portfolio via the System in response to the client’s answers to the online questionnaire.

The client may then indicate an interest in a portfolio that is one level less or more conservative or aggressive than the recommended portfolio, but we then make the final decision and select a portfolio based on all the information we have about the client.

The System also includes an automated investment engine through which we manage the client’s portfolio on an ongoing basis through automatic rebalancing and tax-loss harvesting (if the client is eligible and elects).

Clients do not pay brokerage commissions or any other fees to CS&Co. as part of the Program. Schwab does receive other revenues, including (i) the profit earned by Charles Schwab Bank, SSB, a Schwab affiliate, on the allocation to the Schwab Intelligent Portfolios Sweep Program described in the Schwab Intelligent Portfolios Sweep Program Disclosure Statement; (ii) investment advisory and/or administrative service fees (or unitary fees) received by Charles Schwab Investment Management, Inc., a Schwab affiliate, from Schwab ETFs™ Schwab Funds® and Laudus Funds® that we select to buy and hold in the client’s brokerage account; (iii) fees received by Schwab from mutual funds in the Schwab Mutual Fund Marketplace® (including certain Schwab Funds and Laudus Funds) in the client’s brokerage account for services Schwab provides; and (iv) remuneration Schwab receives from the market centers where it routes ETF trade orders for execution.

### **Direct Indexing Portfolios**

Direct indexing is the construction of a custom investment portfolio that mirrors the composition of an index and refers to tracking the performance of an index by buying a sample of individual stocks instead of an ETF or mutual fund.

Our Direct Indexing Portfolios uses the Schwab Personalized Indexing™ service. Schwab Personalized Indexing is a separately managed account that is a portfolio of assets managed by a professional investment team, offers direct ownership of securities with the ability to customize up to three securities, and is optimized to help closely resemble the index is

evaluated and monitored daily. Schwab Personalized Indexing is managed by Charles Schwab Investment Management, Inc. (CSIM) with a 25 basis point annual fee.

We use an online questionnaire to determine the client's investment index objective and select an appropriate separately managed account portfolio that mirrors the composition of the selected index.

**Cash Allocations**

The Direct Indexing portfolios do not require a minimum cash allocation. The ETF Automated Investment Strategies program include a minimum 4% cash allocation. This cash allocation is implemented through the Schwab Intelligent Portfolios Sweep Program, a required feature of the Schwab Intelligent Portfolios program.

The interest rate on cash balances in the Sweep Program is set on the first business day of each month equal to the seven-day yield (with waivers) for the Schwab Government Money Fund Sweep Shares as determined at the end of the prior month. This interest rate and the method used to determine it are both subject to change.

We charge clients a fee for our services as described below under Item 5 Fees and Compensation. Our fees are not set or supervised by Schwab.

We do not limit our advice to securities, but we typically recommend or purchase Exchange traded funds (ETFs), stocks, and fixed income securities. We can use other securities as well to help diversify a portfolio when applicable.

**C. Client Tailored Services and Client Imposed Restrictions**

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We offer the same suite of services to all our clients. However, specific client investment strategies and their implementation are dependent upon each client's current situation (income, tax levels, and risk tolerance levels). Clients cannot impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs.

**D. Wrap Fee Programs**

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A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and other administrative fees.

Nytrx does not participate in any wrap fee programs. Clients will pay any transaction fees, if applicable, when we buy or sell an investment for their account.

**E. Assets Under Management**

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As of January, 4, 2024, Nytrx manages approximately \$2,123,255 in Client assets, all of which are on a discretionary basis. Clients can request more current information at any time by contacting the Advisor.

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**Item 5: Fees and Compensation**

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**A. Fee Schedule**

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Nytrx provides Automated Investment Portfolio Management services via an online interface.

Total Assets Under Management	Annual Fees
All Assets	0.5%

Advisory Fees are calculated on a prorated basis to reflect cash inflows and outflows that take place during the billing period.

These fees are negotiable, and the final fee schedule will be memorialized in the client's advisory agreement. Clients can terminate the agreement without penalty for a full refund of our fees within five business days of signing the Investment Advisory Contract. Thereafter, clients can terminate the Investment Advisory Contract with 10 days' written notice.

## **B. Payment of Fees**

Advisory Management fees are withdrawn directly from the client's accounts with client's written authorization on a quarterly basis. Fees are paid in arrears.

## **C. Client Responsibility for Third Party Fees**

As described in Item 4 Advisory Business, clients do not pay fees to SPT or brokerage commissions or other fees to CS&Co. as part of the Program. Schwab does receive other revenues, including (i) the profit earned by Charles Schwab Bank, SSB, a Schwab affiliate, on the allocation to the Schwab Intelligent Portfolios Sweep Program described in the Schwab Intelligent Portfolios Sweep Program Disclosure Statement; (ii) investment advisory and/or administrative service fees (or unitary fees) received by Charles Schwab Investment Management, Inc., a Schwab affiliate, from Schwab ETFs™ Schwab Funds® and Laudus Funds® that we select to buy and hold in the client's brokerage account; (iii) fees received by Schwab from mutual funds in the Schwab Mutual Fund Marketplace® (including certain Schwab Funds and Laudus Funds) in the client's brokerage account for services Schwab provides; and (iv) remuneration Schwab receives from the market centers where it routes ETF trade orders for execution. Brokerage arrangements are further described below in Item 12 Brokerage Practices.

## **D. Prepayment of Fees**

Nytrx collects its fees in arrears. It does not collect fees in advance.

## **E. Outside Compensation for the Sale of Securities to Clients**

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

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

We do not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

## **Item 7: Types of Clients**

Clients eligible to enroll in our investment management services include individuals, IRAs, and revocable living trusts. Clients that are organizations (such as corporations and partnerships) or

government entities, and clients that are subject to the Employee Retirement Income Security Act of 1974, are not eligible for the ETF Automated Investment Strategies.

You are required to execute a written agreement with Nytrx specifying the advisory services to establish a client arrangement with Nytrx.

Investors evaluating our web-based investment management service should be aware that our relationship with clients is different from the "traditional" investment advisor relationship in several aspects:

1. We are a software based investment advisor which means each client must acknowledge his or her ability and willingness to conduct his or her relationship with Nytrx on an electronic basis. Under the terms of our agreement, each client agrees to receive all account information and account documents (including this Brochure), and any updates or changes to same, through their access to our website and Nytrx's electronic communications. Unless noted otherwise on the website or within this Brochure, Nytrx's advisory service, the signature for our client agreement, and all documentation related to the advisory services are managed electronically. Nytrx does make individual representatives available to discuss servicing matters with clients.
2. To provide advisory services and tailor investment decisions to each client's specific needs, we collect information from each client, including specific information about their investing profile such as financial situation, investment experience, and investment objectives. Nytrx maintains this information in strict confidence subject to our Privacy Policy. When customizing our investment solutions, we rely upon the information received from a client. Although Nytrx contacts its clients periodically (as previously described in Item 4 - Advisory Business and described further in Item 13 - Review of Accounts below), a client must promptly notify Nytrx of any change in her financial situation or investment objectives that might require a review or revision of her portfolio.
3. Our software based financial advisory service includes preselected Exchange Traded Funds (ETFs) for each asset class within the plan recommended to a client. Nytrx does not allow clients to select their own investments because each fund and asset class is part of the overall investment plan. Therefore, our service is not a suitable fit for investors with overly restrictive investment restrictions and may not be permitted to become clients.

The minimum investment required to open or convert an account is \$5,000. The minimum account balance to enroll in the tax-loss harvesting feature is \$50,000.

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

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### **A. Methods of Analysis and Investment Strategies**

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Nytrx's methods of analysis include Fundamental analysis, Quantitative analysis, and technical analysis.

**Fundamental analysis** involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.



**Quantitative analysis** deals with measurable factors as distinguished from qualitative considerations such as the character of management or the state of employee morale, such as the value of assets, the cost of capital, historical projections of sales, and so on.

**Technical analysis** involves the analysis of past market price data.

### **Investment Strategies**

Our strategies can include Long Term trading (securities held at least a year) and Short Term trading (securities sold within a year)

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

## **B. Material Risks Involved**

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**Fundamental analysis** concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

**Quantitative analysis** Investment strategies using quantitative models can perform differently than expected as a result of, among other things, the factors used in the models, the weight placed on each factor, changes from the factors' historical trends, and technical issues in the construction and implementation of the models.

**Technical analysis** attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not consider new patterns that emerge over time.

**Long term trading** is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

**Short term trading** risks include liquidity, economic stability, and inflation, in addition to the long term trading risks listed above. Frequent trading can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

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

## **C. Risks of Specific Securities Utilized**

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Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below are not guaranteed or insured by the FDIC or any other government agency.

**Equity investment** refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity

securities can fluctuate in response to specific situations for each company, industry conditions and the general economic environments.

**Fixed income investments** pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds can be the best known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

**Exchange Traded Funds (ETFs):** An ETF is an investment fund traded on stock exchanges, like stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance. Risks in investing in ETFs include trading risks, liquidity and shutdown risks, risks associated with a change in authorized participants and non-participation of authorized participants, risks that trading price differs from indicative net asset value (iNAV), or price fluctuation and disassociation from the index being tracked. With regard to trading risks, regular trading adds cost to your portfolio thus counteracting the low fees that one of the typical benefits of ETFs. Additionally, regular trading to beneficially “time the market” is difficult to achieve. Even paid fund managers struggle to do this every year, with the majority failing to beat the relevant indexes. With regard to liquidity and shutdown risks, not all ETFs have the same level of liquidity. Since ETFs are at least as liquid as their underlying assets, trading conditions are more accurately reflected in implied liquidity rather than the average daily volume of the ETF itself. Implied liquidity is a measure of what can potentially be traded in ETFs based on its underlying assets. ETFs are subject to market volatility and the risks of their underlying securities, which can include the risks associated with investing in smaller companies, foreign securities, commodities, and fixed income investments (as applicable). Foreign securities are subject to interest rate, currency exchange rate, economic, and political risks, all of which are magnified in emerging markets. ETFs that target a small universe of securities, such as a specific region or market sector, are subject to greater market volatility, as well as to the specific risks associated with that sector, region, or other focus. ETFs that use derivatives, leverage, or complex investment strategies are subject to additional risks. The return of an index ETF is usually different from that of the index it tracks because of fees, expenses, and tracking error. An ETF can trade at a premium or discount to its net asset value (NAV) (or indicative value in the case of exchange-traded notes). The degree of liquidity can vary significantly from one ETF to another, and losses can be magnified if no liquid market exists for the ETF’s shares when attempting to sell them. Each ETF has a unique risk profile,

detailed in its prospectus, offering circular, or similar material, which should be considered carefully when making investment decisions.

Commodities are tangible assets used to manufacture and produce goods or services. Commodity prices are affected by different risk factors, such as disease, storage capacity, supply, demand, delivery constraints and weather. Because of those risk factors, even a well-diversified investment in commodities can be uncertain.

Additionally, there are certain risks associated with utilizing automated investment tools like the one offered by Nytrx.

- Our investment tool is programmed to use certain economic assumptions that may not be updated in a timely manner or shifts in the market.
- The output of the automated investment tool depends upon the accuracy of the information inputted into the tool.
- There may be certain factors or variables which have not been included in the automated investment tool. To the extent some questions are over-generalized, ambiguous, or designed to fit a pre-determined option, the output may not be right for all investor's needs or goals.
- By only using the automated investment service, investors could lose out on the value of human judgment and oversight. Investors may lose out on these qualities when interacting with only a computer program.

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

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

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Nytrx is required to disclose the facts of any legal or disciplinary events that are material to a Client's evaluation of its advisory business or the integrity of management.

We do not have any required disclosures to report.

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

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Neither Nytrx nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer.

We do not utilize nor select third-party investment advisers.

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

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

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We have a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of

Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. Our Code of Ethics is available free upon request to any client or prospective client.

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**B. Recommendations Involving Material Financial Interests**

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

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

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From time to time, representatives of Nytrx can buy or sell securities for themselves that they also recommend to clients. This can provide an opportunity for representatives of Nytrx to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions can create a conflict of interest. Nytrx will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

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

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From time to time, representatives of Nytrx can buy or sell securities for themselves at or around the same time as clients. This can provide an opportunity for representatives of Nytrx to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions can create a conflict of interest; however, we will never engage in trading that operates to the client's disadvantage if our representatives buy or sell securities at or around the same time as clients.

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**Item 12: Brokerage Practices**

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

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Client accounts enrolled in the Program are maintained at, and receive the brokerage services of, CS&Co., a brokerdealer registered with the Securities and Exchange Commission and a member of FINRA and SIPC. While clients are required to use CS&Co. as custodian/broker to enroll in the Program, the client decides whether to do so and opens its account with CS&Co. by entering into a brokerage account agreement directly with CS&Co. We do not open the account for the client. If the client does not wish to place his or her assets with CS&Co., then we cannot manage the client's account through the Program. CS&Co. can aggregate purchase and sale orders for Funds across accounts enrolled in the Program, including both accounts for our clients and accounts for clients of other independent investment advisory firms using the Platform.

Schwab Advisor Services™ is Schwab's business serving independent investment advisory firms like us. Through Schwab Advisor Services, CS&Co. provides us and our clients, both those enrolled in the Program and our clients not enrolled in the Program, with access to its

institutional brokerage services— trading, custody, reporting, and related services—many of which are not typically available to CS&Co. retail customers. However, certain retail customers will be able to get institutional brokerage services from Schwab without going through us. CS&Co. also makes available various support services. Some of those services help us manage or administer our clients' accounts, while others help us manage and grow our business. CS&Co.'s support services described below are available on an unsolicited basis (we don't have to request them) and at no charge to us. The availability to us of CS&Co.'s products and services is not based on us giving particular investment advice, such as buying particular securities for our clients. Here is a more detailed description of CS&Co.'s support services:

CS&Co.'s institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. CS&Co.'s services described in this paragraph can benefit the client and the client's account.

CS&Co. also makes available to us other products and services that benefit us but do not directly benefit the client or its account. These products and services assist us in managing and administering our clients' accounts and operating our firm. They include investment research, both Schwab's own and that of third parties. We use this research to service all or some substantial number of our clients' accounts, including accounts not maintained at CS&Co. In addition to investment research, CS&Co. also makes available software and other technology that:

- Provide access to client account data (such as duplicate trade confirmations and account statements)
- Facilitate trade execution and allocate aggregated trade orders for multiple client accounts.
- Provide pricing and other market data.
- Facilitate payment of our fees from our clients' accounts.
- Assist with back-office functions, recordkeeping, and client reporting.

CS&Co. also offers other services intended to help us manage and further develop our business enterprise. These services include:

- Educational conferences and events
- Technology and business consulting
- Consulting on legal and related compliance needs
- Publications and conferences on practice management and business succession; and
- Access to employee benefits providers, human capital consultants, and insurance providers

CS&Co. provides some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. CS&Co. also discounts or waives its fees for some of these services or pays all or a part of a third party's fees. If you did not maintain your account with Schwab, we would be required to pay for these services from our own resources.

The availability of services from CS&Co. benefits us because we do not have to produce or purchase them. We do not have to pay for these services, and they are not contingent upon us committing any specific amount of business to CS&Co. in trading commissions or assets in custody. With respect to the Program, as described above under Item 4 Advisory Business, we do not pay SPT fees for the Platform so long as we maintain client assets in accounts at CS&Co. The fact that we receive these benefits from Schwab is an incentive for us to recommend the use of Schwab rather than making such a decision based exclusively on your interest in receiving the best value in custody services and the most favorable execution of transactions. This is a conflict of interest. We believe, however, that taken in the aggregate our [selection/recommendation] of CS&Co. as custodian and broker is in the best interests of our clients. It is primarily supported by the scope, quality, and price of CS&Co.'s services and not Schwab's services that benefit only us.

Our exclusive use of the Program creates a material conflict. We receive substantial benefits from CS&Co. at no cost to the firm that aids in our portfolio management and administrative functions on behalf of our clients. In effect, the compensation the firm's clients are indirectly paying CS&Co. is paying for these services to the firm, in addition to any CS&Co. costs of executing client trades and other client services.

We have adopted policies and procedures designed to ensure that our use of Schwab's services is appropriate for each of our clients.

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

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We do not aggregate or bunch the securities to be purchased or sold for multiple clients. This can result in less favorable prices, particularly for illiquid securities or during volatile market conditions.

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**Item 13: Review of Accounts**

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We offer automated investment programs through which clients are invested in a range of investment strategies we have constructed and manage, each consisting of a portfolio of exchange-traded funds and a cash allocation. In addition, we offer Personalized Direct Indexing separate managed accounts consisting of portfolios of stocks that mirrors the composition of an index. We use online questionnaires that helps us determine the client's investment objectives and risk tolerance and select an appropriate investment strategy and portfolio.

Client accounts are not reviewed by Nytrx. We review the investment strategies, allocations, and portfolios at least quarterly. Clients are encouraged to update their online questionnaire profiles for any change in their objectives, risk tolerance, or other pertinent information.

Each client of Nytrx's advisory services will receive a quarterly report detailing the client's account, including assets held and asset value.

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

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We receive an economic benefit from Schwab in the form of the support products and services it makes available to us. You do not pay more for assets maintained at Schwab as a result of these arrangements. However, we benefit from the arrangements because the cost of these services

would otherwise be borne directly by us. You should consider these conflicts of interest when selecting a custodian. The products and services provided by Schwab, how they benefit us, and the related conflicts of interest are described above under Item 12 Brokerage Practices. The availability to us of Schwab's products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

Nytrx has entered into an agreement with SmartAsset Advisors LLC (SmartAsset) to receive referrals generated from SmartAsset's online marketing efforts. Nytrx is given the individual's name and contact information that they provide and that have expressed interest in hearing from a qualified investing professional. We pay a flat monthly fee for prospective clients. The monthly fee is payable regardless of whether the prospect becomes our advisory client. Nytrx does not increase the fees of advisory clients matched through the SmartAsset program to cover the monthly fee. Individuals referred to Nytrx by SmartAdvisor are not required or obligated in any way to work with Nytrx. The selection of an investment adviser is important and should not be based solely on marketing or referrals, including referrals from SmartAdvisor. Individuals that find us through SmartAdvisor are free to work with any investment adviser or financial professional of their own choosing.

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### **Item 15: Custody**

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Under government regulations, we are deemed to have custody of a client's assets if the client authorizes us to instruct CS&Co. to deduct our advisory fees directly from the client's account. CS&Co. maintains actual custody of clients' assets. Clients receive account statements directly from CS&Co. at least quarterly. They will be sent to the email or postal mailing address the client provides to CS&Co.

Clients should carefully review those statements promptly when received. We also urge clients to compare CS&Co.'s account statements to the periodic account statements/portfolio reports clients will receive from us.

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

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We provide discretionary investment advisory services to clients. The advisory agreement established with each client sets forth the discretionary authority for trading. Where investment discretion has been granted, we can manage the client's account and makes investment decisions without consultation with the client as to when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, what securities to buy or sell, or the price per share.

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

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We will not ask for nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

### **Item 18: Financial Information**

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We neither requires nor solicits prepayment of more than \$1,200 in fees per client, six months or more in advance, and therefore are not required to include a balance sheet with this brochure.

We do not have a financial condition that is reasonably likely to impair our ability to meet contractual commitments to Clients and we have not been the subject of a bankruptcy petition at any time during the past ten years.