

**Item 1 – Cover Page**

# **Disclosure Brochure**

**(Form ADV, Part 2A)**

## **MYRA Advisors LLC**

**(805) 380-MYRA**

March 1st, 2024

This Disclosure Brochure provides information about the qualifications and business practices of MYRA Advisors LLC. If clients have any questions about the contents of this brochure, please contact [Compliance@MyraWealth.com](mailto:Compliance@MyraWealth.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.

MYRA Advisors LLC is a registered investment adviser. Registration as an investment adviser does not imply any level of skill or training. Additional information about MYRA Advisors LLC is available on SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by conducting a Firm search using our Firm CRD No. 311475.

## **Item 2 – Material Changes**

Initially, during account opening, the Client acknowledges receipt of a copy of Advisor's Form ADV, Part 2A ("Disclosure Brochure"), Part 2B ("Brochure Supplement"), Part 3 ("Form CRS"), and Privacy Policy. Advisor provides Client with either a Summary of Material Changes or an updated Disclosure Brochure on an annual basis. Advisor provides Client with an updated Brochure Supplement when material changes occur.

Since our Disclosure Brochure dated January 1st, 2024, we have some material changes:

- Item 5: Consult Fees. Effective March 1st, 2024, we have updated the fees for CONSULT for Accredited Individuals and Accredited Households. The annual base fee (\$4,000 for Accredited Individuals and \$6,000 for Accredited Households) is increased by \$1,000 for each additional \$1 million of Net Worth over \$1 million. See Item 5 for additional details.

Advisor's Form ADV, Part 2A and Part 3 are also currently available on [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by conducting a Firm search using Advisor's CRD Number.

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## Item 4 – Advisory Business

MYRA Advisors LLC is a registered investment adviser (“RIA”) with the US Securities and Exchange Commission (“SEC”). MYRA Advisors LLC is a Delaware limited liability company formed in 2019, and is wholly-owned by MYRA, Inc.

As of December 31st, 2023, we had approx. \$40M of discretionary assets under management.

MYRA Advisors LLC provides INVEST, PLAN and CONSULT services. These services are offered via 2 plan types: (1) FREE (30-day trial), or (2) PAID subscriptions. There are 4 types of PAID subscriptions: (1) Non-Accredited Individual, (2) Accredited Individual, (3) Non-Accredited Household, and (4) Accredited Household.

Note: You are an Accredited Investor if: (1) your Net worth is over \$1 million, excluding primary residence (individually or with spouse or partner), OR (2) you earned an income of over \$200,000 (individually) or \$300,000 (with a spouse or partner) in each of the prior two years, and reasonably expect the same for the current year. Note: You are a Household if you have a spouse or partner.

FREE (30-day trial) includes the Dashboard, and may include INVEST services for an additional fee. FREE (30-day trial) does not include any consultations from a financial advisor. Clients may avail CONSULT (One-Time) services for an additional fee when enrolled in the FREE (30-day trial). PAID subscriptions include Dashboard, PLAN and CONSULT (ongoing) services, and may include INVEST services for an additional fee.

Clients may access our services through an interactive website operated by our affiliate, MYRA Technologies LLC (the “Platform”). MYRA Technologies LLC is a wholly-owned subsidiary of MYRA, Inc. This Platform is an interactive website in which computer software-based models and applications provide investment advice to clients based on personal information provided by each client through the website, as well as, offers clients a variety of educational resources, account aggregation tools, access to tax services offered by MYRA Tax LLC (an affiliate and wholly-owned subsidiary of MYRA, Inc.), and access to other unaffiliated product and service providers.

PLAN enables a client to create a digital financial plan using online tools on the Platform. The financial plan includes various topics, including a summary of income and assets, education savings, insurance, investment planning, tax strategies, saving for retirement, estate planning, employee benefits selection, and other related planning.

CONSULT enables clients to schedule a consultation with an adviser, typically a CERTIFIED FINANCIAL PLANNER™<sup>1</sup> to discuss various topics including basic finances, education savings,

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<sup>1</sup> CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by

insurance, tax strategies, saving for retirement, estate planning, employee benefits selection, and other related planning.

INVEST enables a client to open taxable brokerage (e.g. individual brokerage, joint brokerage, trust), retirement (e.g. IRA, Roth IRA, SEP IRA), education savings (e.g. 529 plan) and health savings accounts (collectively referred to "Account") using the Platform. This Platform is an interactive website in which computer software-based models and applications provide financial advice to clients based on personal information provided by each client through the website. The portfolio composition typically is made up of cash and exchange-traded funds (ETFs). We do not offer a wrap-fee program (a program that includes transaction costs in the advisory fee); however, we try to use zero commission fee ETFs to minimize transaction costs. INVEST services will be provided on a discretionary basis, which means that clients grant us the authority to make investment decisions and implement transactions on client's behalf without obtaining client's prior consent and approval. Clients may impose restrictions on investing in certain securities or types of securities in accordance with client's values or beliefs as long as such restrictions allow us to reasonably manage client's assets. Client's assets will be held with a qualified custodian. Please see Item 12 below for further information on the custodians and brokerage practices.

To receive our services, clients will be asked to provide information through the Platform. Because we rely on information clients provide to make our recommendations, it is important that clients provide complete and accurate information. Clients should notify us immediately of any changes in client's financial objectives, goals, and risk tolerance, as well as any other material changes to client's personal financial circumstances (such as client's employment status, marital status, or financial condition) by updating their Settings in the Platform. These changes may affect our recommendations. In providing our services, we are not required to verify any information we receive from clients or from other professionals acting on client's behalf (e.g., attorney, accountant, payroll providers), and we are expressly authorized to rely on the information clients provide directly or indirectly. When clients are enrolled as a household, we may rely on the information provided by any one client on behalf of the other client (typically a spouse or partner).

Clients receive our Disclosure Brochure, Form CRS, Privacy Policy and Terms of Use through the Platform before being presented with an advisory agreement. If clients wish to engage our services, clients will accept our disclosures and execute the advisory agreement electronically.

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Certified Financial Planner Board of Standards, Inc. ("CFP Board"). The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the CFP Board requirements of education, examination, experience, and ethics.

We will use our best judgment and good faith effort in providing services to our clients. As an RIA, we act as a client's fiduciary, which means that we must act in the client's best interests. We cannot guarantee the success of any recommendations we provide, or any particular level of performance, or that an investment will be profitable over time. Past performance does not guarantee future results. Investing involves risk, and investments may lose value over time.

Except as otherwise provided by law, we are not liable for any losses in an account if our investment decisions and actions are made in good faith with the degree of care, skill, and prudence that a person acting in a fiduciary capacity would use. In addition, we are not liable for any losses arising as a result of following client's directives, or for any act or failure to act by a service provider (e.g. custodian) maintaining an account.

## **Item 5 – Fees and Compensation**

MYRA offers 2 types of plans:

1. FREE (30-day trial): \$0
2. PAID subscription(s): Varies between \$3,000 to \$15,000 per year. Auto renews annually.

Note: By default, all Clients are enrolled in the FREE (30-day trial). Clients must subscribe to the PAID subscription via the MYRA Portal (i.e., interactive website) after the initial 30 days. If a client does not elect a PAID subscription, MYRA reserves the right to disable or delete the client's account, including deletion of any links to banks, documents added, or other personal information provided by client.

Note: FREE (30-day trial) does not include any consultations with a financial advisor. Clients subscribed in the FREE (30-day trial), may avail One-Time Consultations ranging from \$0 to \$15,000 per consultation. A typical CONSULT (one-time) is \$1,500 for a one-time digital financial plan, and a 45-minute consultation by video or audio conference within 30 days.

Clients may also elect to subscribe to PAID subscriptions, where they get unlimited consultation for 12 months with a Certified Financial Planner™ (CFP®) to discuss your personal finances.

There are 4 types of PAID subscriptions:

1. Non-Accredited, Individual = \$3,000 per year
2. Accredited, Individual = \$4,000 per year + \$1,000 per year (for each additional \$1 million of Net Worth over \$1 million)
3. Non-Accredited, Household = \$4,500 per year
4. Accredited, Household = \$6,000 per year + \$1,000 per year (for each additional \$1 million of Net Worth over \$1 million)

Example: For an Accredited Individual with Net Worth of at least \$1 million but under \$2 million, the annual fee is \$4,000; with a Net Worth of at least \$2 million but under \$3 million, the annual

fee would be  $\$4,000 + \$1,000 = \$5,000$  per year. For an Accredited Household with a Net Worth of at least \$1 million but under \$2 million, the annual fee is \$6,000; with a Net Worth of at least \$5 million but less than \$6 million would be  $\$6,000 + \$4,000 = \$10,000$  per year.

Note: You are Accredited if: (1) your Net Worth is over \$1 million, excluding primary residence (individual or household), OR (2) you earned an income over \$200,000 (individual) or \$300,000 (household) in each of the prior two years, and reasonably expect the same for the current year.

During initial sign-up, the Client must subscribe via MYRA Portal to a PAID subscription type that best describes their financial status (Accredited vs. Non-Accredited) and personal situation (e.g. Individual vs. Household). After initial sign-up, the Client or Advisor may update the PAID subscription type based on the Client's current financial status and personal situation. Advisor encourages Client to notify Advisor promptly if Client's financial status or personal situation changes. You should review your PAID subscription type for accuracy, and inform Advisor immediately if there is a discrepancy. PAID subscriptions auto-renew until canceled by the Client from the MYRA Portal, under Settings >> Billing.

PAID subscription type upgrades that result in a fee increase (e.g. Non-Accredited Individual to Accredited Individual, or Non-Accredited Individual to Non-Accredited Household) take effect immediately, and auto renew for a 12 month period from the date of subscription type change (i.e., the new Effective Date). The Client is charged the full subscription fee for the new Subscription Type, and then issued a prorated refund for the old Subscription Type.

Example: If Client signed up as Non-Accredited Individual (\$3,000 per year) on January 1st, 2022 and consequently got married on July 1st, 2022 and upgraded to Non-Accredited Household (\$4,500 per year), then on July 1st, 2022 the Client would be billed \$4,500 for the Non-Accredited Household (new) subscription effective from July 1st, 2022 to June 30, 2023 (with automatic annual renewal on July 1st, 2023), and would be refunded  $\$3,000 \times 6 \text{ months} = \$1,500$  for the Non-Accredited Individual (old) subscription.

PAID subscription type downgrades that result in a fee decrease (e.g. Accredited Individual to Non-Accredited Individual, or Accredited Household to Accredited Household) only take effect at the end of the 12 months from the Effective Date, when the Agreement is due for auto renewal. In this case, there would be no refund.

Example: If Client signed up for Non-Accredited Household (\$4,500 per year) on January 1st, 2022 and consequently got divorced on July 1st, 2022, then on January 1st, 2023 the Client would be downgraded to Non-Accredited Individual (new) subscription, and auto renewed at \$3,000 per year. Since the subscription type change is at the end of the 12 month period, there is no refund due to the Client.

Clients may engage an Advisor for PLAN Services. Fees range from \$0 to \$15,000 depending on the scope and timeline of the engagement. The scope and timelines are mutually agreed

upon by the Advisor and Client. PLAN Services fees are non-refundable. Client is responsible for payment of fees prior to termination.

Clients may avail INVEST Services for an additional fee with any CONSULT Services:

- For FREE subscription: our annual fee for INVEST services is 1.50% (150 basis points) of assets under management (“AUM”), with a minimum fee of \$25 per month.
- For PAID subscription: our annual fee for INVEST services ranges between 1.50% (150 basis points) to 0.25% (25 basis points) of assets under management (“AUM”), with a minimum fee of \$25 per month. Specifically, the tiered fee structure is as follows:
  - 1.50% = \$0 to \$1M AUM
  - 1.25% = \$1M to \$2M AUM
  - 1.00% = \$2M to \$3M AUM
  - 0.75% = \$3M to \$4M AUM
  - 0.50% = \$4M to \$5M AUM
  - 0.25% = \$5M+ AUM

Note: INVEST Services renew automatically on a monthly basis, until terminated.

For a terminated account, the Client is responsible for the entire month’s INVEST fee for the Account, irrespective of which date the account was terminated. Example: If Client has an Individual Brokerage account with \$50,000 balance, and requests to terminate the INVEST service anytime between January 1st to January 31st, the Client is responsible for the entire month’s INVEST fee of \$62.50, calculated as  $\$50,000 \times 1.50\% \times 1/12$  months.

Note: INVEST Services fees are applied at an Account level, not at a Client or Household level.

Advisor’s fee is determined by taking the percentage rate shown above multiplied by Account balance as of the last business day of the month (“Month End Balance”), with a minimum fee of \$25 per month. If a Client has less than \$25 in Month End Balance, the fee will be the total balance in the Account on the last business day of the month. Fees are rounded up or down to 2 decimal places (i.e., \$2.085 is rounded up to \$2.09, and \$2.084 is rounded down to \$2.08).

**Example 1:** Client A is enrolled in the PAID subscription, and has a Month End balance of \$100,000. The billed fee is \$125 per month (as  $100,000 \times 1.50\% / 12 = 125$ ).

**Example 2:** Client B is enrolled in the PAID subscription, and has a Month End balance of \$10,000. The billed fee is \$25 per month (as  $10,000 \times 1.50\% / 12 = 12.50$ , but since 12.50 is less than 25, the minimum fee is \$25 per month).

**Example 3:** Client C is enrolled in the FREE subscription, and has a Month End balance of \$25,000. The billed fee is \$31.25 per month (as  $25,000 \times 1.50\% / 12 = 31.25$ ).



For INVEST Services, since fees are calculated in arrears, no refunds will be issued upon termination. Client is responsible for payment of fees prior to termination.

Upon signing the Client Agreement, the Client authorizes the Advisor to deduct all Service fees (including, but not limited to CONSULT fees, INVEST fees, PLAN fees, and TAX fees) directly from the Client's Managed Account ("Account") at qualified custodian. This fee authorization is also approved by the Client in the brokerage account agreement with the Custodian. If there is insufficient cash in Client's Account to pay Advisor's fees, an equal balance of securities in Client's Account may be sold to pay Advisor's fee.

If a Client's Account does not have a sufficient balance of securities to pay the Advisor's fee, the Advisor may deduct your fees from another Client Account in the same household. Example: if Advisor's fee is \$100 on Client's Brokerage account, but the Client's Brokerage account does not have a \$100 cash (or security) balance available, then Advisor may deduct the \$100 fees from Client's Spouse's Brokerage Account (if under same household).

The Client may also opt in (on the interactive website) to pay any and all Services fees (including, but not limited to CONSULT fees, INVEST fees, PLAN fees, and TAX fees) by bank transfer (ACH or wire transfer), credit card, or debit card. An ~3% surcharge may apply for fees paid by credit card or debit card.

Our Services fees (including, but not limited to CONSULT fees, INVEST fees, PLAN fees, and TAX fees) are generally not negotiable, although we do reserve the right to waive or reduce fees in certain circumstances, or to offer promotional discounts at the sole discretion of the Advisor.

Clients may also be charged an ACH transaction fee (both for a deposit into the Account or withdrawal from the Account). Neither Advisor nor any affiliate retains or receives a share of the ACH fee, which is retained solely by the ACH processor. In addition to our advisory fees, clients may incur additional charges on Client's Account(s), such as custodial fees, brokerage commissions, internal fees and expenses charged by mutual funds and ETFs, account maintenance and termination fees, and other fees and taxes on Accounts. Client is responsible for payment of all other third-party fees (e.g., custodial fees, mutual fund fees, 12b-1 fees, transaction fees). Those fees are separate from Advisor's Services fees.

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

We do not assess performance-based fees, and we do not engage in side-by-side management of accounts.

## **Item 7 – Types of Clients**

Our PLAN, CONSULT, INVEST services are appropriate for individuals (including high net worth individuals), trusts and businesses. We do not impose an AUM minimum to receive services.

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

We primarily practice passive investment management. Passive investing involves building portfolios that are composed of various distinct asset classes. The asset classes are weighted in a manner to achieve a desired relationship between risk and return. Funds that passively capture the returns of the desired asset classes are placed in the portfolio. The funds that are used to build passive portfolios are typically exchange traded funds (“ETF”). Passive investment management is characterized by low expense ratios (i.e. the funds inside the portfolio have low internal costs), minimal trading costs (due to infrequent trading activity), and relative tax efficiency (because the funds inside the portfolio are tax efficient and turnover inside the portfolio is minimal). In contrast, active management involves a single manager or managers who employ some method, strategy or technique to construct a portfolio that is intended to generate returns that are greater than the broader market or a designated benchmark. Academic research indicates most active managers underperform the market. A portfolio that employs a passive, “efficient markets” approach (generally representative of index investing) has the potential risk at times to generate lower-than-expected returns for the broader allocation than might be the case for a more narrowly focused asset class, and the return on each type of asset may deviate from the average return for the asset class. We believe this variance from the expected return is generally low under normal market conditions when a portfolio is made up of diverse, low-correlated or uncorrelated assets. Our investment portfolios are designed to produce the appropriate potential return for the given level of risk; however, we cannot guarantee that an investment objective or goal will be achieved. Clients must be able to bear the risk of loss that is associated with their account, which may include the loss of some or all principal invested.

**Material Risks Involved:** All investments involve risk and may result in a loss of client's original investment which clients should be prepared to bear. Many of these risks apply equally to stocks, bonds, commodities and any other investment or security. To the extent we provide analysis or recommendations for the client's investment portfolio, clients should be aware of some material risks that exist with investing, including the following:

- **Company Risk:** When investing in securities, there is always a certain level of company or industry-specific risk that is inherent in each company or issuer. For example, there is the risk that a company will perform poorly or have its value reduced based on factors specific to the company or its industry. This is also referred to as unsystematic risk and can be reduced or mitigated through diversification.

- **Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year because purchasing power is eroding at the rate of inflation.
- **Management Risk:** An investment with a firm varies with the success and failure of its investment strategies, research, analysis and determination of its portfolio. If an investment strategy were not to produce expected returns, the value of the investment would decrease.
- **Market Risk:** When the stock market as a whole or an industry as a whole falls in value, it can cause the prices of individual stock prices to fall indiscriminately. This is also called systemic or systematic risk.
- **Research Data:** When research and analyses are based on commercially available software, rating services, general market and financial information, or due diligence reviews, a firm is relying on the accuracy and validity of the information or capabilities provided by selected vendors, rating services, market data, and the issuers themselves. Therefore, while we may make efforts to determine the accuracy of the information received, we cannot predict the outcome of events or actions taken or not taken, or the validity of all information researched or provided which may or may not affect the advice regarding or investment management of an account.
- **Security-Specific Risks:** Our asset selection process seeks to identify ETFs which exhibit high liquidity, low expenses, and low tracking error. Our selection process does not guarantee the quality of a particular ETF or that it will (1) be profitable, (2) properly track any comparable index, (3) trade in a liquid fashion, or (4) trade at or above its publicly-posted net asset value. We reserve the right to change the selection of ETFs we recommend at any time. Changes in the selection of ETFs that we use may result in the sale of existing holdings and could be subject to additional tax liability.
- **Small- and Mid-Cap Company Risk:** A portion of most portfolios will include investments in ETFs that invest in small and medium market capitalization companies. Securities of companies with small and medium market capitalizations are often more volatile and less liquid than investments in larger companies. Small and medium capitalization companies may face a greater risk of business failure, which could increase the volatility of the Client's portfolio.
- **Cash Drag Risk:** The allocation of cash within a client's portfolio has an impact on portfolio performance. As the allocation to cash increases, the volatility of the entire portfolio is reduced. In times when invested assets are increasing in value, portfolios with increased amounts of cash lead to returns which lag a fully invested portfolio. Alternatively, when invested assets are declining in value, portfolios with an increased amount of cash lead to a less significant decline in the portfolio.
- **ETF Risks:** The risk of owning ETFs reflect the risks of their underlying securities (e.g., alternative investments, stocks, bonds, etc.). ETFs also carry additional expenses based on their share of operating expenses and certain brokerage fees, which may result in the potential duplication of certain fees.
- **Fixed Income Risks:** Various forms of fixed income instruments, such as bonds, money market or bond funds, or certain ETFs containing these holdings, may be affected by various forms of risk, including: [1] **Credit Risk** – The potential risk that an issuer would

be unable to pay scheduled interest or repay principal at maturity, sometimes referred to as “default risk.” Credit risk may also occur when an issuer’s ability to make payments of principal and interest when due is interrupted. This may result in a negative impact on all forms of debt instruments, as well as funds or ETF share values that hold these issues. Bondholders are creditors of an issuer and have priority to assets before equity holders (i.e., stockholders) when receiving a payment from liquidation or restructuring. When defaults occur due to bankruptcy, the type of bond held will determine payment seniority., [2] Duration Risk – Duration is a measure of a bond’s volatility, expressed in years to be repaid by its internal cash flow (interest payments). Bonds with longer durations carry more risk and have higher price volatility than bonds with shorter durations., [3] Interest Rate Risk – The risk that the value of the fixed income holding will decrease because of an increase in interest rates., [4] Liquidity Risk – The inability to readily buy or sell an investment for a price close to the true underlying value of the asset due to a lack of buyers or sellers. While certain types of fixed income instruments are generally liquid (i.e., bonds), there are risks which may occur such as when an issue trading in any given period does not readily support buys and sells at an efficient price. Conversely, when trading volume is high, there is also a risk of not being able to purchase a particular issue at the desired price., and [5] Reinvestment Risk – With declining interest rates, investors may have to reinvest interest income or principal at a lower rate.

Index Investing: Index investing may have the potential to be affected by “active risk” (or “tracking error risk”), which might be defined as a deviation from a stated benchmark. If a portfolio attempts to closely replicate a stated benchmark, the source of the tracking error or deviation may come from a satellite portfolio or position, or from a “sample” or “optimized” index fund or ETF that may not as closely align the stated benchmark. In these instances, a portfolio manager may choose to reduce the weighting of a satellite holding, utilize very active satellites, or use a “replicate index” position as part of its core holdings to minimize the effects of the tracking error in relation to the overall portfolio.

Qualified Dividend Income (“QDI”) Ratios: While many ETFs and index mutual funds are known for their potential tax-efficiency and higher QDI percentages, there are asset classes within these investment vehicles or holding periods within that may not benefit. Shorter holding periods, as well as commodities and currencies (that may be part of an ETF or mutual fund portfolio), may be considered “non-qualified” under certain tax code provisions. A holding’s QDI should be considered when tax-efficiency is an important aspect of the client’s portfolio.

Use of Algorithms: We use computer-based technology to make investment recommendations and in the portfolio management processes. Accounts are continuously monitored by rebalancing software to ensure the investments held correctly reflect the selected model portfolio. Clients should be aware that this type of portfolio management is based on a pre-set investment allocation that could rebalance the client’s account and not take certain market conditions into consideration. Such trading may occur on a more frequent basis than clients might expect and may not address prolonged changes in market conditions. Understand that

changes to the algorithmic code could also have material effects on client's portfolio recommendations and investment management. In the event of extraordinary market conditions, we may halt trading or take other temporary measures meant to ensure client's financial protection.

**Alternative Investments:** Strategies involving “alternative” investments generally include those which do not fall into equity, fixed income or cash equivalents. Such investments would include “real assets” such as real estate and commodities, and alternative strategies such as absolute return strategies and various other hedge fund-type strategies: global macro, managed futures, long/short equity, multi-strategy, event driven, private equity, etc. The goal of these alternative strategies is to provide for diversification in order to lower portfolio volatility and enhance long-term returns. The alternative investments we recommend are managed through ETFs; they are not individual holdings. We do not directly invest in any alternative investments including hedge funds, managed futures accounts, or private equity.

**Catastrophic Events:** Our investment strategies may be subject to the risk of loss arising from direct or indirect exposure to a number of types of catastrophic events, such as global pandemics, natural disasters, acts of terrorism, cyber-attacks, or network outages. The extent and impact of any such event on investment strategies will depend on many factors, including the duration and scope of the event, the extent of any governmental restrictions, the effect on the supply chain, overall consumer confidence, and the extent of the disruption to global and domestic markets.

## **Item 9 – Disciplinary Information**

We have not been involved, and our management personnel have not been involved, in any material criminal or civil action in a domestic, foreign or military jurisdiction, an administrative enforcement action, or self-regulatory organization proceeding involving an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses.

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

We are not registered, and do not have an application pending to register, as a broker-dealer, a futures commission merchant, commodity pool operator, or a commodity trading advisor. No members of our management or associated persons are registered or have applications pending to register as a registered representative or associated person of the foregoing entities.

Non-advisory services are available to our clients through the Platform, including tax services from our affiliate MYRA Tax LLC and access to other products and services from non-affiliated providers. If clients choose to engage in these non-advisory services, our affiliates may receive economic benefit.

## **Item 11 – Code of Ethics, Client Transactions, Personal Trading**

We have adopted a Code of Ethics that establishes policies for ethical conduct for all personnel. We require our personnel to comply with all applicable laws and regulations and to act in an ethical and professionally responsible manner in all professional services and activities. Our Code of Ethics includes prohibitions against insider trading, circulation of industry rumors, and certain political contributions, among others. We periodically review our Code of Ethics and update it as necessary to ensure it remains current. A copy of our Code of Ethics is available upon request.

We do not buy securities from or sell securities to clients from our own accounts, except for when executing block trades. We do not have any proprietary investments that we recommend to our clients. We do not act as an investment adviser to any investment company that we recommend to our clients.

Our firm and our associated persons may buy or sell securities the same as, similar to, or different from, those we recommend to clients for the client's account. A recommendation made to one client may be different in nature or in timing from a recommendation made to another client. Clients often have different objectives and risk tolerances. At no time, however, will we or any of our related persons receive preferential treatment over our clients.

In an effort to reduce or eliminate certain conflicts of interest for us or our associated persons, our policy may require that we restrict or prohibit associated persons' transactions in specific securities transactions. Any exceptions or trading pre-clearance must be approved by our Chief Compliance Officer in advance of the transaction in an account, and we maintain the required personal securities transaction records per regulation.

## **Item 12 – Brokerage Practices**

For PLAN and CONSULT services we provide non-discretionary advice, clients are responsible for implementing our recommendations, including the selection of any custodian or broker-dealer. We do not recommend custodians or broker-dealers. Furthermore, the Firm does not participate in any formal soft-dollar arrangements but we do receive certain benefits from a broker-dealer as described below.

For INVEST: We have established a relationship with Charles Schwab & Co., Inc. ("Schwab"). Schwab Advisor Services™ provides custody, trading, and the support services of Schwab, member SIPC, to independent investment advisors (e.g. MYRA) and Charles Schwab Investment Management, Inc. ("CSIM"). Independent investment advisors (including MYRA) are not owned by, affiliated with or supervised by Schwab.

Client's assets must be maintained in an account with Schwab as the qualified custodian, except for 529 plans which are maintained by my529.org (Utah Educational Savings Plan®). For

accounts opened through our Platform, and held at Schwab or my529.org, we provide discretionary advice.

We participate in the institutional adviser program offered by Schwab. There is no direct link between our participation in the institutional customer service program and the investment advice we give to our clients, although we receive economic benefits that are typically not available to retail investors. These benefits are available to all investment advisers who participate in the program, and include the following products and services (provided without cost or at a discount): receipt of duplicate client statements and confirmations; research related products and tools; consulting services; access to a trading desk; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to client accounts); the ability to have advisory fees deducted directly from client accounts; access to an electronic communications network for client order entry and account information; access to ETFs with no transaction fees; access to certain institutional money managers; discounts on compliance, marketing, research, technology, practice management products or services provided to us by third-party vendors.

Schwab may have also paid for business consulting and professional services received by us or our associated persons. Some of the products or services made available by Schwab through the institutional customer program may benefit us but may not benefit our client accounts. Other services made available by Schwab are intended to help us manage and further develop our business enterprise. The benefits received by us or our associated persons through participation in the institutional customer program do not depend on the amount of brokerage transactions directed to Schwab. As part of our fiduciary duty to clients, we endeavor at all times to put the interests of our clients first. Clients should be aware, however, that the receipt of economic benefits by us or our associated persons in and of itself creates a potential conflict of interest and may indirectly influence our choice of Schwab for custody and brokerage services.

We participate in an adviser program with my529.org (Utah Educational Savings Plan®) that provides us with economic benefits. These benefits are available to all investment advisers who participate in the program, and include the following products and services (provided without cost or at a discount): receipt of duplicate client statements and confirmations; research related products and tools; access to a trading desk; and access to an electronic communications network for client order entry and account information.

### **Research and Other Soft Dollar Benefits**

We do not participate in any formal soft dollar arrangements. The research products and services that our firm might receive from Schwab (or other custodians or brokerage firms) may include financial publications, information about particular companies and industries, and other products or services that provide lawful and appropriate assistance to us in the performance of our investment decision-making responsibilities. Such research products and services are provided to all investment advisers who use Schwab, and not the result of a formal soft-dollar arrangement even though they might be considered a soft dollar benefit to us and create a

conflict of interest as noted in the prior section. However, the commissions charged by a particular broker for a particular transaction, or set of transactions, might be greater than the amounts another broker who did not provide research services or products might charge. We do not receive any referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

### **Aggregating (Block) Trading for Multiple Client Accounts**

We place aggregated orders involving multiple client accounts trading in the same securities. Each client that participates in an aggregated transaction will participate at the average share price for transactions in the aggregated order.

## **Item 13 - Review of Accounts**

PLAN: Clients may access information about the client's plan at any time through the Platform. We do not provide any ongoing monitoring of the client's plan, and we do not provide periodic statements or reports.

CONSULT: We do not provide any ongoing monitoring, and we do not provide periodic statements or reports.

INVEST: Client's Account is periodically rebalanced using software-based model or application to ensure portfolio is in alignment with client's investment objectives and risk tolerance. Additionally, any reasonable restrictions clients impose will be reviewed to confirm they are being followed. Events that may trigger a special review would be unusual performance, addition or deletions of client-imposed restrictions, market volatility, changes in investment strategies, or withdrawals from or deposits into the account. Clients receive trade confirmations directly from the custodian for each transaction in their accounts as well as monthly account statements and annual tax reporting statements from their custodian showing all activity in the accounts. We encourage clients to review these statements carefully. Information regarding the client's account may be available through the Platform.

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

Client Referrals: We do not directly (or indirectly) compensate any person (or entity) for client referrals.

Other Compensation: As noted above, we receive economic benefits from Schwab in the form of support products and services that Schwab makes available to us and other independent advisers whose clients maintain accounts at Schwab. The availability of Schwab's products and services to us is based solely on our participation in the program and not on the provision of any particular investment advice.



## **Item 15 – Custody**

Except for the ability to deduct our fee from the client's investment account (which is deemed to be a form of custody), we do not accept custody of the client's assets or funds. Clients should receive monthly statements from the client's account custodian that shows disbursements from the client's account, including our fee.

## **Item 16 – Investment Discretion**

PLAN services are available on a non-discretionary basis. This means that clients are solely responsible for deciding whether to accept or reject our recommendations, and clients are responsible for implementing our recommendations as clients deem appropriate.

CONSULT services are available on a non-discretionary basis. This means that clients are solely responsible for deciding whether to accept or reject our recommendations, and clients are responsible for implementing our recommendations as clients deem appropriate.

INVEST services for accounts opened through our Platform, and held at Schwab or my529.org we provide discretionary advice. This means that we have the authority to implement investment strategies and transactions to meet stated objectives without requiring client's prior authorization. Clients grant us this authority when clients accept our advisory agreement, as well as the custodian's account agreement. Clients retain the right to terminate our account discretion; however, this will terminate our advisory agreement as well.

Clients may impose reasonable restrictions upon investments to be held in the client's portfolio. We reserve the right to reject requests for restrictions that are inconsistent with our stated investment strategy or methodology or that are inconsistent with the nature or operation of our INVEST services. As a result, some requests for restrictions may not be considered reasonable and therefore would not be accepted. Such restrictions could result in a strategy that differs from our portfolio recommendation and may not meet client's financial goals, investment objectives, time horizon, risk tolerance, and other metrics.

## **Item 17 – Voting Client Securities**

For the convenience of the Client, by default, we receive proxies. Client hereby authorizes Custodian to forward proxy soliciting materials, annual reports, and other related issuer materials, normally sent to Client, to us and to allow us to vote Proxies on the Client's behalf. We are not required to vote any proxies or respond to any corporate actions or elective actions with respect to securities held in the Client's Account. In addition, we will not offer guidance involving any claim in any bankruptcy or class action settlement, or other corporation actions that involve the securities held in the client's account.

## **Item 18 – Financial Information**

We do not require prepayment of fees six months or more in advance. Therefore, we are not required to provide a balance sheet for our most recent fiscal year end. Furthermore, we do not have any financial condition that is reasonably likely to impair our ability to meet our contractual requirements to our clients. Finally, we have not been the subject of a bankruptcy petition.

MYRA Advisors LLC

+1 (805) 380-6972

**Form ADV Part 2B – Brochure  
Supplement**

Dated: March 1st, 2024

*For*

**Sahil Vakil - Individual CRD# 6122494**

President, and Chief Compliance Officer

This brochure provides information about Sahil Vakil that supplements the MYRA Advisors LLC brochure. A copy of that brochure precedes this supplement. Please contact Sahil Vakil if the brochure is not included with this supplement or if you have any questions about the contents of this supplement. Additional info about Sahil Vakil is available on SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) which can be found using the identification number 6122494.

## Item 2: Educational Background and Business Experience

### Sahil Vakil

#### Educational Background

- 2016 - MBA, The Wharton School, University of Pennsylvania
- 2008 - Master of Science (MS), University of Southern California
- 2006 - Bachelor of Engineering (BEng), University of Mumbai

#### Business Experience

- 01/2021 – Present, MYRA Advisors LLC, President and CCO
- 09/2022 – Present, New York University (NYU), Adjunct Professor
- 05/2018 – 10/2023, MYRA Capital LLC, President and CCO
- 06/2016 – 04/2018, BNP Paribas, Vice President
- 04/2016 – 06/2016, Amazon, Manager
- 06/2011 – 03/2016, Deloitte Consulting, Consultant
- 04/2011 – 06/2011, PwC, Consultant
- 02/2008 – 04/2011, Ernst & Young, Consultant

#### Professional Designations, Licensing & Exams

**Chartered Financial Analyst (CFA):** The CFA Program is a graduate-level self-study program that combines a broad-based curriculum of investment principles with professional conduct requirements. It is designed to prepare charter holders for a wide range of investment specialties that apply in every market all over the world. To earn a CFA charter, applicants study for three exams (Levels I, II, III) using an assigned curriculum. Upon passing all three exams and meeting the professional and ethical requirements, a charter is awarded.

**CFP (Certified Financial Planner)®:** The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 83,000 individuals have obtained CFP® certification in the United States. To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk

management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;

- Examination – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board's *Code of Ethics and Standards of Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and Standards of Conduct, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the *Code of Ethics and Standards of Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients. CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

### Item 3: Disciplinary Information

Sahil Vakil has never been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

### Item 4: Other Business Activities

Sahil Vakil does not have any operational other business activities at this time.

### Item 5: Additional Compensation

Sahil Vakil, as President & Chief Compliance Officer, receives compensation from MYRA Advisors LLC.

### Item 6: Supervision

Sahil Vakil, as President & Chief Compliance Officer of MYRA Advisors LLC, is responsible for supervision.