

Item 1 – Cover Page

MyLaunch, LLC

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Date of Disclosure Brochure: April 2016

This disclosure brochure provides information about the qualifications and business practices of MyLaunch, LLC (also referred to as we, us and MyLaunch throughout this disclosure brochure). If you have any questions about the contents of this disclosure brochure, please contact Gregory Kinkaid at 541-608-0551 or greg@koeniginvestment.com. The information in this disclosure brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about MyLaunch is also available on the Internet at www.adviserinfo.sec.gov. You can view our firm's information on this website by searching for MyLaunch, LLC or our firm's CRD number 283205.

*Registration as an investment adviser does not imply a certain level of skill or training.

Item 2 – Material Changes

MyLaunch is a newly registered investment adviser, and this disclosure brochure dated April 2016 is the first disclosure brochure prepared by our firm. In the future, this item will discuss only specific material changes that are made to the disclosure brochure and provide readers with a summary of such changes. We will also reference the date of the last annual update of this disclosure brochure.

We will ensure that you receive a summary of any material changes to this and subsequent disclosure brochures within 120 days after our firm's fiscal year ends. Our firm's fiscal year ends on December 31, so you will receive the summary of material changes no later than April 30 each year. At that time we will also offer or provide a copy of the most current disclosure brochure. We may also provide other ongoing disclosure information about material changes as necessary.

Item 3 – Table of Contents

Item 1 – Cover Page	1
Item 2 – Material Changes	2
Item 3 – Table of Contents	3
Item 4 – Advisory Business	4
Introduction	4
Description of Advisory Services	4
Limits Advice to Certain Types of Investments	5
Tailor Advisory Services to Individual Needs of Clients	5
Client Assets Managed by MyLaunch	6
Item 5 – Fees and Compensation	6
Item 6 – Performance-Based Fees and Side-By-Side Management	7
Item 7 – Types of Clients	7
Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss	8
Investment Strategies	9
Risk of Loss	10
Item 9 – Disciplinary Information	10
Item 10 – Other Financial Industry Activities and Affiliations	11
Item 11 – Code of Ethics, Participation in Client Transactions and Personal Trading	12
Code of Ethics Summary	12
Affiliate and Employee Personal Securities Transactions Disclosure	12
Item 12 – Brokerage Practices	13
Directed Brokerage	14
Block Trading Policy	14
Item 13 – Review of Accounts	14
<i>Account Reviews and Reviewers</i>	14
<i>Statements and Reports</i>	15
Item 14 – Client Referrals and Other Compensation	15
Item 15 – Custody	15
Item 16 – Investment Discretion	16
Item 17 – Voting Client Securities	16
Item 18 – Financial Information	16
Customer Privacy Policy Notice	16

Item 4 – Advisory Business

MyLaunch is an investment adviser registered with the United States Securities and Exchange Commission (“SEC”) and is a limited liability company (LLC) formed under the laws of the State of Oregon.

- Gregory Koenig is the Managing Member of MyLaunch. Gregory Koenig owns 80.00% of MyLaunch.
- LorrieAnne Miller is a Member and the Chief Compliance Officer of MyLaunch. LorrieAnne Miller owns 10.00% of MyLaunch.
- Jeffrey McCullough is the Member of MyLaunch. Jeffrey McCullough owns 10.00% of MyLaunch.

MyLaunch filed its initial application to become registered as an investment adviser in April 2016.

Introduction

The investment advisory services of MyLaunch are provided to you through an appropriately licensed and qualified individual who is an investment adviser representative of MyLaunch (referred to as your investment adviser representative throughout this brochure).

Description of Advisory Services

The following is a description of the primary advisory services of MyLaunch. Please understand that a written agreement, which details the exact terms of the service, must be signed by you and MyLaunch before we can provide you the services described below.

MyLaunch offers investment management services by providing you continuous and ongoing supervision over your specified accounts. 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.

Each individualized portfolio is designed to be consistent with your investment objectives and risk tolerances. We create an investment plan and manage your portfolio by seeking to identify: 1) the optimal asset classes in which to invest, 2) efficient investments to represent each of those asset classes, 3) the ideal mix of asset classes based on your specific risk tolerance, 4) the most appropriate time to rebalance your portfolio to maintain intended risk tolerance and optimal return for your risk level. MyLaunch will tailor its allocation and investment management strategies based on your risk tolerance.

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 qualified custodian(s) under your name by TD Ameritrade, Inc. which serves as qualified custodian and broker/dealer. As qualified custodian, TD Ameritrade, Inc., 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 TD Ameritrade, Inc.

It is important that you understand that we manage investments for other clients and may 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, sell or recommend to you any security or other investment that we may buy, sell or recommend for any other clients or for our own accounts.

Conflicts may 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.

Administrative and Platform Services Provided by Trizic

MyLaunch has contracted with and pays Trizic (www.trizic.com) to utilize its digital advisory, technology platforms. Trizic and MyLaunch are not affiliated companies. Trizic is not an investment adviser or broker/dealer, but works with investment advisory firms, like MyLaunch, to develop, customize, and implement web based, interactive investment advisory services. Trizic supports our firm by providing a customized website, website administration, risk questionnaire, portfolio implementation and rebalancing. They also provide assistance with partial billing period fee calculation, billing, and provide other functions related to the administrative tasks of managing client accounts. Due to this arrangement, Trizic will have access to MyLaunch client accounts, but Trizic will not serve as an investment advisor to MyLaunch clients. The fees we pay to Trizic for their administrative and platform services come from the management fees we charge to client accounts. Please refer to Item 5 – Fees and Compensation for details about the fees charged for our services.

Limits Advice to Certain Types of Investments

MyLaunch provides investment advice on the following types of investments:

- Exchange Traded Funds (ETFs); and
- Mutual Funds.

When providing asset management services, MyLaunch typically constructs each client's account holdings using ETFs and mutual funds to build diversified portfolios. It is not our typical investment strategy to attempt to time the market, but we may increase cash holdings modestly as deemed appropriate based on your risk tolerance and our expectations of market behavior.

(Please refer to Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss for more information.)

Tailor Advisory Services to Individual Needs of Clients

MyLaunch's advisory services are always provided based on your individual needs. We work with you through interviews and questionnaires to determine your investment objectives and suitability information.

The determination to use a particular model or models is always based on each client's individual investment objectives. When managing client accounts through our firm's web-based, asset management services program, we will manage a client's account in accordance with one or more investment models.

When we provide web-based, asset management services, you are given the ability to impose restrictions on the accounts we manage for you, including specific investment selections and sectors. We will not enter into an investment adviser relationship with a prospective client whose investment objectives may be considered incompatible with our investment philosophy or strategies or where the prospective client seeks to impose unduly restrictive investment guidelines. Client models are used as a basis for accounts. The exact investments and weightings thereof will be determined by answers to client suitability questions such as risk tolerance, investment objectives, years until retirement, needs of children and other dependents, etc.

Client Assets Managed by MyLaunch

As a newly registered investment adviser, MyLaunch has no assets under management to report as of the date of this Brochure.

Item 5 – Fees and Compensation

In addition to the information provided in *Item 4 – Advisory Business*, this section provides additional details regarding our firm's services along with descriptions of each service's fees and compensation arrangements. It should be noted that lower fees for comparable service may be available from other sources. The exact fees and other terms will be outlined in the agreement between you and MyLaunch.

Fees charged for our web-based, asset management services are charged based on a percentage of assets under management, billed in advance (at the start of the billing period) on a quarterly calendar basis and calculated based on the fair market value of your account as of the last business day of the previous billing period. Fees are prorated (based on the number of days service is provided during the initial billing period) for your account opened at any time other than the beginning of the billing period. If asset management services are commenced in the middle of the billing period, then the prorated fee for that billing period will be billed in arrears at the end of that billing period.

The asset management services continue in effect until terminated by either party (i.e., MyLaunch or you) by providing written notice of termination to the other party. When fees are billed in advance and termination of services is effective other than the last business day of the billing period, MyLaunch will prorate the final fee based on the number of days services are provided during the final period and provide refund. The amount of client assets on the termination date will be used to determine the final fee payment.

The annual fee for asset management services will be 0.50%.

There is a minimum account size of \$500.

MyLaunch believes that its annual fee is reasonable in relation to: (1) services provided and (2) the fees charged by other investment advisers offering similar services/programs. However, our annual investment advisory fee may be higher than that charged by other investment advisers offering similar services/programs. In addition to our compensation, you may also incur charges imposed at the mutual fund level (e.g., advisory fees and other fund expenses).

Our investment advisory fees will be deducted from your account and paid directly to our firm by TD Ameritrade. You will authorize TD Ameritrade to deduct fees from your account and pay such fees directly to our firm. You should review your account statements received from the qualified custodian(s) and verify that appropriate investment advisory fees are being deducted. TD Ameritrade will not verify the accuracy of the investment advisory fees deducted.

Brokerage expenses and/or transaction ticket fees charged by TD Ameritrade are billed directly to your account by TD Ameritrade. MyLaunch does not receive any portion of such expenses or fees from you or TD Ameritrade. In addition, you may incur certain charges imposed by third parties other than MyLaunch in connection with investments made through your account including, but not limited to, mutual fund sales loads, 12b-1 fees and surrender charges, IRA and qualified retirement plan fees, and charges imposed by TD Ameritrade. Management fees charged by MyLaunch are separate and distinct from the fees and expenses charged by mutual funds that are held in your account. A description of these fees and expenses are available in each mutual fund prospectus. We do not receive any portion of such fees or expenses.

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

Performance-based fees are defined as fees based on a share of capital gains on or capital appreciation of the assets held in a client's account. *Item 6* is not applicable to this Disclosure Brochure because we do not charge or accept performance-based fees.

Item 7 – Types of Clients

MyLaunch generally provides investment advice to the following types of clients:

- Individuals
- Pension and profit sharing plans
- Trusts, estates, or charitable organizations
- Corporations or business entities other than those listed above

You are required to execute a written agreement with MyLaunch specifying the particular advisory services in order to establish a client arrangement with MyLaunch.

MyLaunch requires a minimum of \$500 in order to open an account.

Investors evaluating MyLaunch's web based investment management service should be aware that MyLaunch's relationship with clients is likely to be different from the "traditional" investment advisor relationship in several aspects:

- MyLaunch is a software based investment advisor which means each client must acknowledge her ability and willingness to conduct her relationship with MyLaunch 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 MyLaunch's electronic communications. Unless noted otherwise on the website or within this Brochure, MyLaunch's advisory service, the signature for our client agreement, and all documentation related to the advisory services are managed electronically. MyLaunch does make individual representatives available to discuss servicing matters with clients.

- To provide its advisory services and tailor its investment decisions to each client's specific needs, MyLaunch collects information from each client, including specific information about their investing profile such as financial situation, investment experience, and investment objectives. MyLaunch maintains this information in strict confidence subject to our Privacy Policy. When customizing our investment solutions, MyLaunch relies upon the information received from a client. Although MyLaunch contacts its clients periodically as described further in Item 13 below, a client must promptly notify MyLaunch of any change in her financial situation or investment objectives that might require a review or revision of her portfolio.
- The software based financial advisor service includes preselected ETFs and mutual funds for each asset class within the plan recommended to a client.

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

MyLaunch uses the following methods of analysis in formulating investment advice:

Fundamental – This is a method of evaluating a security by attempting to measure its intrinsic value by examining related economic, financial and other qualitative and quantitative factors. Fundamental analysts attempt to study everything that can affect the security's value, including macroeconomic factors (like the overall economy and industry conditions) and individually specific factors (like the financial condition and management of a company). The end goal of performing fundamental analysis is to produce a value that an investor can compare with the security's current price in hopes of figuring out what sort of position to take with that security (underpriced = buy, overpriced = sell or short). Fundamental analysis is considered to be the opposite of technical analysis. Fundamental analysis is about using real data to evaluate a security's value. Although most analysts use fundamental analysis to value stocks, this method of valuation can be used for just about any type of security.

The risk associated with fundamental analysis is that it is somewhat subjective. While a quantitative approach is possible, fundamental analysis usually entails a qualitative assessment of how market forces interact with one another in their impact on the investment in question. It is possible for those market forces to point in different directions, thus necessitating an interpretation of which forces will be dominant. This interpretation may be wrong, and could therefore lead to an unfavorable investment decision.

Technical – This is a method of evaluating securities by analyzing statistics generated by market activity, such as past prices and volume. Technical analysts do not attempt to measure a security's intrinsic value, but instead use charts and other tools to identify patterns that can suggest future activity. Technical analysts believe that the historical performance of stocks and markets are indications of future performance.

Technical analysis is even more subjective than fundamental analysis in that it relies on proper interpretation of a given security's price and trading volume data. A decision might be made based on a historical move in a certain direction that was accompanied by heavy volume; however, that heavy volume may only be heavy relative to past volume for the security in question, but not compared to the future trading volume. Therefore, there is the risk of a trading

decision being made incorrectly, since future trading volume is an unknown. Technical analysis is also done through observation of various market sentiment readings, many of which are quantitative. Market sentiment gauges the relative degree of bullishness and bearishness in a given security, and a contrarian investor utilizes such sentiment advantageously. When most traders are bullish, then there are very few traders left in a position to buy the security in question, so it becomes advantageous to sell it ahead of the crowd. When most traders are bearish, then there are very few traders left in a position to sell the security in question, so it becomes advantageous to buy it ahead of the crowd. The risk in utilization of such sentiment technical measures is that a very bullish reading can always become more bullish, resulting in lost opportunity if the money manager chooses to act upon the bullish signal by selling out of a position. The reverse is also true in that a bearish reading of sentiment can always become more bearish, which may result in a premature purchase of a security.

Other Methods of Analysis - Morningstar Office mutual fund information, Morningstar Office stock information, ValueLine, proprietary services specializing in securities analytics and financial oriented websites.

Investment Strategies

MyLaunch uses the following investment strategies when managing client assets and/or providing investment advice:

Long term purchases. Investments held at least a year.

Short term purchases. Investments sold within a year.

Primarily Recommend One Type of Security

MyLaunch primarily recommends Mutual funds and Exchange Traded Funds ("ETFs").

Different mutual fund categories have different risk characteristics and investors should not compare different categories. For example, a bond fund and a stock fund that both have below average risk still have different risk/return potential (stock funds traditionally have higher risk/return potential). Risks are based on the investments held in the fund. For example, a bond fund faces interest rate risk and income risk and income is affected by the change in interest rates. A sector fund (investing in a single industry) is at risk that its price will decline due to industry developments. The following are some risks to consider when investing in mutual funds:

- **Call Risk:** A bond issuer may redeem high-yield bonds before maturity date due to falling interest rates.
- **Default Risk:** A bond issuer may fail to repay interest and principal.
- **Income Risk:** Dividends in a fixed income fund may decline due to falling interest rates.
- **Geology Risk:** Political events, natural disasters or financial problems may weaken a country or state's economy and cause investments to decline.
- **Industry Risk:** Stocks in a single industry may decline due to developments in that industry.
- **Inflation Risk:** Increases in the cost of living can reduce or eliminate a fund's actual returns when adjusted for inflation.
- **Manager Risk:** A manager may not execute the fund's investment strategy in a timely or effective manner.
- **Exchange Traded Funds Risk:** Investing in an exchange traded fund ("ETF") often involves the same risks as investing in the underlying securities the ETF is tracking. ETF prices may

vary significantly from the net asset value due to market conditions. Certain exchange traded funds, such as inverse funds, may not track underlying benchmarks as expected.

Risk of Loss

Past performance is not indicative of future results. Therefore, you should never assume that future performance of any specific investment or investment strategy will be profitable. Investing in securities (including stocks, mutual funds, and bonds, etc.) involves risk of loss. Further, depending on the different types of investments there may be varying degrees of risk. You should be prepared to bear investment loss including loss of original principal.

Because of the inherent risk of loss associated with investing, our firm is unable to represent, guarantee, or even imply that our services and methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to market corrections or declines. There are certain additional risks associated with investing in securities through our investment management program, as described below:

- **Market Risk** – Either the stock market as a whole, or the value of an individual company, goes down resulting in a decrease in the value of client investments. This is also referred to as systemic risk.
- **Fixed Income Risk**. When investing in bonds, there is the risk that the issuer will default on the bond and be unable to make payments. Further, individuals who depend on set amounts of periodically paid income face the risk that inflation will erode their spending power. Fixed-income investors receive set, regular payments that face the same inflation risk.
- **ETF and Mutual Fund Risk** – When investing in a an ETF or mutual fund, you will bear additional expenses based on your pro rata share of the ETF's or mutual fund's operating expenses, including the potential duplication of management fees. The risk of owning an ETF or mutual fund generally reflects the risks of owning the underlying securities the ETF or mutual fund holds. You will also incur brokerage costs when purchasing ETFs.

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

- 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.

Item 9 – Disciplinary Information

Item 9 is not applicable to this Disclosure Brochure because there are no legal or disciplinary events that are material to a client's or prospective client's evaluation of our business or integrity.

Item 10 – Other Financial Industry Activities and Affiliations

MyLaunch is **not** and does **not** have a related person that is a broker/dealer, municipal securities dealer, government securities dealer or broker, an investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund," and offshore fund), a futures commission merchant, commodity pool operator, or commodity trading advisor, a banking or thrift institution, an accountant or accounting firm, a lawyer or law firm, an insurance company or agency, a pension consultant, a real estate broker or dealer, and a sponsor or syndicator of limited partnerships.

Affiliated Investment Advisor Firm, Koenig Investment Advisory, LLC

The primary owner of MyLaunch is Gregory Koenig, who owns 100% of Koenig Investment Advisory, LLC. Unlike MyLaunch which only provide web-based, asset management service, Koenig Investment Advisory, LLC is a more traditional investment adviser.

MyLaunch, LLC is designed to provide investment services to clients with less complex investment needs. Clients of MyLaunch, LLC will pay an annual fee which in general is significantly lower than the typical fee charged by Koenig Investment Advisory, LLC. While they will have access to registered investment advisors, it is assumed they will not have complex situations that require extensive advice. It is a best fit for clients with simple, low cost investment portfolios who do not expect material changes to their financial situation in the short-term.

Koenig Investment Advisory, LLC serves the more mature investor with more complex needs. Clients of Koenig Investment Advisory, LLC have a more complex portfolio of assets, are nearing retirement or other life changes, require more specialized tax planning, require financial plans, wish to hold individual bonds or alternative assets, or have specific circumstances that require additional time and resources to adequately manage. Koenig Investment Advisory, LLC clients generally pay an annual tiered fee of 1% on the first \$250,000 under management, 0.75% on assets from \$250,000 to \$500,000, and 0.50% on assets above \$500,000, with the occasional lower rate for family members and long-term clients grandfathered in from previous fee structures.

The investment adviser representatives of MyLaunch are also licensed in a separate capacity as an investment adviser representatives with Koenig Investment Advisory, LLC. As described above, MyLaunch and Koenig Investment Advisory, LLC are under common control. Through Koenig Investment Advisory, LLC, an investment adviser representative may provide financial planning and asset management services in a more traditional manner via telephone calls and in-person meetings and not through a web-based communications. When providing such services on behalf of Koenig Investment Advisory, LLC representatives earn advisory fees from Koenig Investment Advisory, LLC.

MyLaunch and its investment adviser representatives may recommend that a client of MyLaunch utilize the services of Koenig Investment Advisory, LLC if such client is seeking services not provided by MyLaunch and such client is able to meet the higher minimum requirements of Koenig Investment Advisory, LLC. Since Koenig Investment Advisory, LLC and its investment adviser representative will receive additional compensation if a MyLaunch client utilizes the services of Koenig Investment Advisory, LLC, this is conflict of interest. MyLaunch mitigates this risk by only recommending Koenig Investment Advisory, LLC when in the interest of the client.

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

Code of Ethics Summary

MyLaunch has established a Code of Ethics that will apply to all of its associated persons. As a fiduciary, it is an investment advisor's responsibility to provide fair and full disclosure of all material facts and to act solely in the best interest of each of our clients at all times. MyLaunch has a fiduciary duty to all clients. This fiduciary duty is considered the core underlying principle for our Code of Ethics which also covers our Insider Trading and Personal Securities Transactions Policies and Procedures. MyLaunch has the responsibility to make sure that the interests of all clients are placed ahead of MyLaunch's own investment interest. Full disclosure of all material facts and potential conflicts of interest will be provided to clients prior to any services being conducted. MyLaunch will conduct business in an honest, ethical and fair manner and avoid all circumstances that might negatively affect or appear to affect our duty of complete loyalty to all clients. This section is intended to provide clients with a summary of MyLaunch's Code of Ethics. Clients may receive a complete copy of the Code of Ethics upon request.

Affiliate and Employee Personal Securities Transactions Disclosure

MyLaunch or associated persons of the firm may buy or sell for their personal accounts, investment products identical to those recommended to clients. This creates a potential conflict of interest. It is the express policy of MyLaunch that all persons associated in any manner with our firm must place clients' interests ahead of their own when implementing personal investments. MyLaunch and its associated persons will not buy or sell securities for their personal account(s) where their decision is derived, in whole or in part, by information obtained as a result of employment or association with our firm unless the information is also available to the investing public upon reasonable inquiry.

We are now and will continue to be in compliance with applicable state and federal rules and regulations. To prevent conflicts of interest, we have developed written supervisory procedures that include personal investment and trading policies for our representatives, employees and their immediate family members (collectively, associated persons):

- Associated persons cannot prefer their own interests to that of the client.
- Associated persons cannot purchase or sell any security for their personal accounts prior to implementing transactions for client accounts.
- Associated persons cannot buy or sell securities for their personal accounts when those decisions are based on information obtained as a result of their employment, unless that information is also available to the investing public upon reasonable inquiry.
- Associated persons are prohibited from purchasing or selling securities of companies in which any client is deemed an "insider".
- Associated persons are discouraged from conducting frequent personal trading.
- Associated persons are generally prohibited from serving as board members of publicly traded companies unless an exception has been granted to the Chief Compliance Officer of MyLaunch.

Any associated person not observing our policies is subject to sanctions up to and including termination.

Item 12 – Brokerage Practices

MyLaunch requires that you establish brokerage accounts with TD Ameritrade through their Institutional Platform. TD Ameritrade, Inc. ("TD Ameritrade") is a member of FINRA/SIPC/NFA. TD Ameritrade is an independent (and unaffiliated) SEC-registered broker-dealer and is utilized by MyLaunch to maintain custody of clients' assets and to effect trades for their accounts.

At least annually, we will review alternative custodians in the marketplace for comparison to the currently used custodian, evaluating criteria such as overall expertise, cost competitiveness, and financial condition. Quality of execution for custodians will be reviewed through trade journal evaluations.

MyLaunch is independently owned and operated and not affiliated with TD Ameritrade.

The primary factor in suggesting a broker/dealer or custodian is that the services of the recommended firm are provided in a cost-effective manner. While quality of execution at the best price is an important determinant, best execution does not necessarily mean lowest price and it is not the sole consideration. The trading process of any broker/dealer and money manager suggested by MyLaunch must be efficient, seamless, and straight-forward. Overall custodial support services, trade correction services, and statement preparation are some of the other factors determined when suggesting a broker/dealer.

TD Ameritrade, Inc. provides us with access to their institutional trading and custody services, which are typically not available to retail investors. These services generally are available to independent investment advisors at no charge to them so long as the independent investment advisors maintain a minimum amount of assets with the custodian.

TD Ameritrade does not charge separately for custody but is compensated by account holders through commissions or other transaction-related fees for securities trades that are executed by recommended money managers through the custodian or that settle into a custodian account.

These benefits include, but are not necessarily limited to: receipt of duplicate client confirmations and bundled duplicate statements; access to a trading desk; access to block trading which provides the ability to aggregate securities transactions and allocate the appropriate shares to client accounts; the ability to have investment advisory fees deducted directly from client accounts; access to an electronic communications network for client order entry and account information; and access to mutual funds that generally require significantly higher minimum initial investments or are generally only available to institutional investors.

TD Ameritrade, Inc. also makes available to us other products and services that benefit our firm but may not benefit clients' accounts. Some of these other products and services assist us in managing and administering clients' accounts. These include software and other technology that provide access to client account data (such as trade confirmation and account statements); provide research, pricing information and other market data; facilitate payment of the firm's fees from its clients' accounts; and assist with back-office functions; record keeping and client reporting. Many of these services generally may be used to service all or a substantial number of our accounts, including accounts not maintained at a recommended custodian. MyLaunch is also providing other services intended to help our firm manage and further develop our business enterprise. These services may include consulting, publications and conferences on

practice management, information technology, business succession, regulatory compliance and marketing.

Directed Brokerage

Clients should understand that not all investment advisors require the use of a particular broker/dealer or custodian. Some investment advisors allow their clients to select whichever broker/dealer the client decides. By requiring clients to use a particular broker/dealer, MyLaunch may not achieve the most favorable execution of client transactions and the practice requiring the use of specific broker/dealers may cost clients more money than if the client used a different broker/dealer or custodian. However, for compliance and operational efficiencies, MyLaunch has decided to require our clients to use broker/dealers and other qualified custodians determined by MyLaunch.

Block Trading Policy

We may elect to purchase or sell the same securities for several clients at approximately the same time. This process is referred to as aggregating orders, batch trading or block trading and is used by our firm when MyLaunch believes such action may prove advantageous to clients. If and when we aggregate client orders, allocating securities among client accounts is done on a fair and equitable basis. Typically, the process of aggregating client orders is done in order to achieve better execution, to negotiate more favorable commission rates or to allocate orders among clients on a more equitable basis in order to avoid differences in prices and transaction fees or other transaction costs that might be obtained when orders are placed independently.

MyLaunch uses the pro rata allocation method for transaction allocation.

Under this procedure, pro rata trade allocation means an allocation of the trade at issue among applicable advisory clients in amounts that are proportional to the participating advisory client's intended investable assets. MyLaunch will calculate the pro rata share of each transaction included in a block order and assigns the appropriate number of shares of each allocated transaction executed for the client's account.

If and when we determine to aggregate client orders for the purchase or sale of securities, including securities in which MyLaunch or our associated persons may invest, we will do so in accordance with the parameters set forth in the SEC No-Action Letter, *SMC Capital, Inc.* Neither we nor our associated persons receive any additional compensation as a result of block trades.

Item 13 – Review of Accounts

Account Reviews and Reviewers

Managed accounts are reviewed on daily by algorithms built into software to identify trades for investing cash, generating cash and rebalancing accounts.

MyLaunch's software based financial advisor service assumes that a portfolio will not stay optimized over time and must be periodically rebalanced back to its original targets to maintain the intended risk level and asset allocations. MyLaunch reviews each client's account when it is opened, and continuously monitors and periodically rebalances each client's portfolio to seek to maintain a client's targeted risk tolerance and optimal return for the client's risk level. MyLaunch also conducts reviews when material changes may have occurred to a client's portfolio or investment objectives.

On a quarterly basis, MyLaunch contacts each client to remind them to review and update the profile information they previously provided. MyLaunch also requests that clients reconfirm the same information on an annual basis. These notifications and confirmations include a link to the client's current information and contact information.

Currently Gregory Koenig and/or Jeffrey McCullough are responsible for leading all reviews.

Statements and Reports

You are provided with transaction confirmation notices and regular quarterly account statements directly from TD Ameritrade.

Performance information is available through our interactive website, but we do not mail or otherwise deliver performance or position reports to you. Therefore, you must login to view and access any reports we make available to you. MyLaunch provides all clients with continuous access via the Site to real-time reporting information about account status, securities positions and balances. Clients may also receive periodic communications describing portfolio performance, Account information, and product features. You are encouraged to always compare any reports or statements provided by us against the account statements delivered from TD Ameritrade. When you have questions about your account statement, you should contact us and TD Ameritrade.

Item 14 – Client Referrals and Other Compensation

MyLaunch does not directly or indirectly compensate anybody for client referrals.

Other than the receipt of investment management fees detailed in Item 5 of this brochure, MyLaunch receives no other compensation in connection with our web-based, investment management services.

Item 15 – Custody

Custody, as it applies to investment advisors, has been defined by regulators as having access or control over client funds and/or securities. In other words, custody is not limited to physically holding client funds and securities. If an investment adviser has the ability to access or control client funds or securities, the investment adviser is deemed to have custody and must ensure proper procedures are implemented.

MyLaunch is deemed to have custody of client funds and securities whenever MyLaunch is given the authority to have fees deducted directly from client accounts. However, this is the only form of custody MyLaunch will ever maintain. It should be noted that authorization to trade in client accounts is not deemed by regulators to be custody.

For accounts in which MyLaunch is deemed to have custody, we have established procedures to ensure all client funds and securities are held at a qualified custodian in a separate account for each client under that client's name. Clients or an independent representative of the client will direct, in writing, the establishment of all accounts and therefore are aware of the qualified custodian's name, address and the manner in which the funds or securities are maintained. Finally, account statements are delivered directly from the qualified custodian to each client, or the client's independent representative, at least quarterly. Clients should carefully review those statements and are urged to compare the statements against reports received from MyLaunch. When clients have questions about their account statements, they should contact MyLaunch or the qualified custodian preparing the statement.

Item 16 – Investment Discretion

Our services are provided strictly on a **discretionary** basis which means we will have the authority to determine the type of securities and the amount of securities that can be bought or sold for your portfolio without obtaining your consent for each transaction. You must grant us with discretionary trading authority in the client agreement you execute through our interactive website.

Item 17 – Voting Client Securities

MyLaunch does not vote proxies on behalf of clients. We have determined that taking on the responsibilities for voting client securities does not add enough value to the services provided to you to justify the additional compliance and regulatory costs associated with voting client securities. Therefore, it is your responsibility to vote all proxies for securities held in Account.

You will receive proxies directly from the qualified custodian or transfer agent; we will not provide you with the proxies. You are encouraged to read through the information provided with the proxy-voting documents and make a determination based on the information provided.

Item 18 – Financial Information

This *Item 18* is not applicable to this brochure. MyLaunch does not require or solicit prepayment of more than \$1200 in fees per client, six months or more in advance. Therefore, we are not required to include a balance sheet for the most recent fiscal year. We are not subject to a financial condition that is reasonably likely to impair our ability to meet contractual commitments to clients. Finally, MyLaunch has not been the subject of a bankruptcy petition at any time.

No Arrangement with Issuer of Securities

MyLaunch and its management do not have any relationship or arrangement with any issuer of securities.

Customer Privacy Policy Notice

In November of 1999, Congress enacted the Gramm-Leach-Bliley Act (GLBA). The GLBA requires certain financial institutions, such as investment advisor firms, to protect the privacy of customer information. In situations where a financial institution does disclose customer information to nonaffiliated third parties, other than permitted or required by law, customers must be given the opportunity to opt out or prevent such disclosure. MyLaunch does not share or disclose customer information to nonaffiliated third parties except as permitted or required by law.

Commitment to Your Private Information. MyLaunch is committed to safeguarding the confidential information of its clients. MyLaunch holds all personal information provided by clients in the strictest confidence and it is the objective of the firm to protect the privacy of all clients. Except as permitted or required by law, the firm does not share confidential information about clients with nonaffiliated parties. In the event that there were to be a change in this policy, the firm will provide clients with written notice and clients will be provided an opportunity to direct MyLaunch as to whether such disclosure is permissible.

Why We Collect and How We Use Information. To conduct regular business, MyLaunch may collect personal information from sources such as:

- Information reported by the client on applications or other forms the client provides to the firm
- Information about the client's transactions implemented by the firm or others
- Information developed as part of analyses or investment advisory services

To administer, manage, service, and provide related services for client accounts, it is necessary for MyLaunch to provide access to customer information within the firm and to nonaffiliated companies, with whom the firm has entered into agreements with. To provide the utmost service, the firm may disclose the information below regarding customers and former customers, as necessary, to companies to perform certain services on the firm's behalf.

- Information MyLaunch receives from the client on applications (name, social security number, address, assets, etc.)
- Information about the client's transactions with the firm or others (account information, payment history, parties to transactions, etc.)
- Information concerning investment advisory account transactions
- Information about a client's financial products and services transaction with MyLaunch

Sharing Information with Other Companies Permitted Under Law. Since MyLaunch shares nonpublic information solely to service client accounts, the firm does not disclose any nonpublic personal information about the firm's customers or former customers to anyone, except as permitted by law. However, the firm may also provide customer information outside of the firm as required by law, such as to government entities, consumer reporting agencies or other third parties in response to subpoenas. In the event that the firm has a change to its customer privacy policy that would allow it to disclose non-public information not covered under applicable law, the firm will allow its clients the opportunity to opt out of such disclosure.

Former Customers. Even if we cease to provide you with financial products or services, our Privacy Policy will continue to apply to you and we will continue to treat your nonpublic information with strict confidentiality.