



375 Commerce Street

Southlake, TX 76092

www.1305eQuity.com

Form ADV Part 2A

Client Brochure

November 9, 2016

This brochure (“Brochure”) provides information about the qualifications and business practices of 1305 eQuity Holdings, LLC a registered investment adviser. Registration does not imply a certain level of skill or training but only indicates that 1305 eQuity Holdings, LLC has registered its business with state and federal regulatory authorities, including the United States Securities and Exchange Commission. 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.

If you have any questions about the contents of this Brochure, please contact us at (951) 660-7307 or Staff@1305eQuity.com. Additional information about 1305 eQuity Holdings, LLC is also available on the SEC’s website at www.adviserinfo.sec.gov.

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Item 2 Material Changes

Personnel

None at this time.

AUM – Item E, Page 4

None at this time.

Conflicts of Interest and Interest in Client Transactions – Item 11, Page 16

None at this time.

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Item 4 Advisory Business

A. General Description of the Firm

1305 eEquity Holdings, LLC, a Wyoming Limited Liability Company, is an investment advisory firm registered with the Securities and Exchange Commission (“SEC”) and Texas State Securities Board. 1305 eEquity performs portfolio investment management services for client accounts through the 1305 eEquity Fee Program (See Item 5). 1305 eEquity is a privately held company headquartered in Southlake, Texas. Additional information about 1305 eEquity’s products, structure, and directors is provided on Part 1 of 1305 eEquity’s Form ADV which is available online at <http://www.adviserinfo.sec.gov>. We encourage visiting our website www.1305eEquity.com for additional information.

B. Summary of 1305 eEquity’s Advisory Services

1305 eEquity provides client portfolio investment management services based on modern portfolio theory and tactical asset allocation. Each individualized portfolio is designed to be consistent with clients’ investment objectives and risk tolerances. We create an investment plan and manage a Client’s portfolio by seeking to identify: 1) the optimal asset classes in which to invest, 2) the most efficient securities or other investments to represent each of those asset classes, 3) the ideal mix of asset classes based on the Client’s specific risk tolerance, and 4) the most appropriate time to rebalance the Client’s portfolio to maintain intended risk tolerance and optimal return for the Client’s risk level.

C. Tailored Services and Investment Restrictions

1305 eEquity tailors its financial advisory service to the individual needs of each of its Clients, and subject to certain product features and account limitations that prospective investors should consider, as described further below in Item 7. Accounts for Clients (“Client Accounts” or “Accounts”) are opened and maintained according to a Client Account Agreement (“Account Agreement”) which describes the discretionary authority that a Client grants to 1305 eEquity.

To tailor its financial advisor services to each Client, 1305 eEquity uses its advanced algorithms, which are based on academic behavioral economics research, to pinpoint an investor’s risk tolerance. 1305 eEquity asks each prospective Client a series of questions to

evaluate both the individual's objective ability to take risk and subjective willingness to take risk. We ask subjective risk questions to determine both the level of risk an individual is willing to take and the consistency among the answers. For example, if an individual is willing to take a lot of risk in one case and very little in another, then the individual is deemed inconsistent and is therefore assigned a lower risk tolerance score than the simple weighted average of her answers. We ask objective questions to estimate with as few questions as possible whether the individual is likely to have enough money saved at retirement to afford her likely spending needs. The greater the excess income, the more risk the Client is able to take. As noted in Item 7.3 a Client may not specify investments in which that Client Account may not invest.

D. Wrap Fee Programs

At this time, 1305 eEquity does not offer a Wrap Fee Program to its Clients but reserves the right to do so in the future.

E. Assets Under Management (AUM)

As disclosed in Company's Form ADV Part 1, 1305 eEquity expects to manage over \$25,000,000.00 in client assets based financial advisor service on a discretionary basis. 1305 eEquity does not manage assets on a nondiscretionary basis.

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Item 5 Fees and Compensation

A. Advisory Fees

1305 eEquity is compensated for its advisory services by charging a fee based on the net market value of a Client's Account. 1305 eEquity reserves the right, in its sole discretion, to negotiate, reduce or waive the advisory fee for certain Client Accounts for any period of time determined by 1305 eEquity. In addition, 1305 eEquity may reduce or waive its fees for the Accounts of some Clients without notice to, or fee adjustment for, other Clients.

1305 eEquity's financial advisory service uses a 1/20/10 advisory fee model based on a Client's assets under management. These fees are charged on a monthly basis as explained in the example below.

1305 eEquity				
Income Sharing Computation				**EXAMPLE**
Q3 2016				
Initial Investment January 1, 2016:			\$1,000,000	
Ending Balance September 30, 2016				
	Custodial Trading Acct	\$1,200,000		
	Custodial Bank Acct	100,000		
TOTAL ASSETS		\$1,300,000		
Treasury Activity Gains		\$300,000		
Net Asset Gains			\$300,000	
End of Period Investment			\$1,300,000	
Computation of Annualize rate of return				
Days of Investment		200		
Gross Rate of Return		30.00%		
Annualized Rate of Return (365 Days)		54.75%		

Quarterly income Allocation computation				
	Annualize Rate for Allocation	Earnings subject to Allocation	Allocation to Client	1305 eQuity Earnings Allocation
	First 20% (10%)	\$109,589	\$98,630	\$10,959
	20- 25% (11%)	54,795	48,767	6,027
	25-30% (12%)	54,795	48,219	6,575
	30-35% (13%)	54,795	47,671	7,123
	35-40% (14%)	54,795	47,123	7,671
	40-45% (15%)	54,795	46,575	8,219
	45-50% (16%)	54,795	46,028	8,767
	50% or more (25%)	(138,356)	(103,767)	(34,589)
	TOTAL	\$300,000	\$279,247	\$20,753

Client invests \$1,000,000.00 to be managed by 1305 eQuity. \$100,000.00 of that investment is held in a custodial bank account to pay the 1% upfront fee 1305 eQuity charges all Clients.

If 1305 eQuity performs and produces a 20% return on the principle amount invested, then 1305 eQuity charges the Client 10% of the performance/gains.

If 1305 eQuity performs and produces a 20-25% return on the principle amount invested, then 1305 eQuity charges the Client 11% of the performance/gains.

If 1305 eQuity performs and produces a 25-30% return on the principle amount invested, then 1305 eQuity charges the Client 12% of the performance/gains.

If 1305 eQuity performs and produces a 30-35% return on the principle amount invested, then 1305 eQuity charges the Client 13% of the performance/gains.

If 1305 eQuity performs and produces a 35-40% return on the principle amount invested, then 1305 eQuity charges the Client 14% of the performance/gains.

If 1305 eQuity performs and produces a 40-45% return on the principle amount invested, then 1305 eQuity charges the Client 15% of the performance/gains.

If 1305 eQuity performs and produces a 45-50% return on the principle amount invested, then 1305 eQuity charges the Client 16% of the performance/gains.

If 1305 eQuity performs and produces a 50% return or higher on the principle amount invested, then 1305 eQuity charges the Client 25% of the performance/gains.

B. Other Account Fees

1305 eQuity is a “fee only” investment advisor, and other than its advisory fee described above, neither the firm nor its employees receive or accept any direct or indirect compensation related to investments that are purchased or sold for Client Accounts. This means that Clients will not be sold products or services that create additional fees or compensation to benefit 1305 eQuity or its employees or its affiliates other than those described in this Brochure and on the website.

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Item 6 Performance-Based Fees and Side-by-Side Management

Company does charge performance-based fees. Our advisory fees are charged as disclosed above in Item 5.

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Item 7 Types of Clients

The minimum amount required to open and maintain a 1305 eEquity Client Account is \$1,000,000.00. As a result of the automation associated with offering its services online, Additional requirements for opening an Account with 1305 eEquity are described in Item 4, above.

At any time, a 1305 eEquity Client may terminate their Account, or withdraw all or part of their Account, or update their investment profile, which may initiate an adjustment of the Client Accounts' holdings. In that case, unless otherwise directed by the Client, 1305 eEquity will sell the securities in the Client Account (or portion of the Account, in the case of a partial withdrawal or update) at market prices at the time of the termination, withdrawal or update.

To provide its advisory services and tailor its investment decisions to each Client's specific needs, 1305 eEquity collects information from each Client, including specific information about their investing profile such as financial situation, investment experience, and investment objectives. 1305 eEquity maintains this information in strict confidence subject to its Privacy Policy, which is provided on the website. When customizing its investment solutions, 1305 eEquity relies upon the information received from a Client. Although 1305 eEquity contacts its Clients periodically as described further in Item 13 below, a Client must promptly notify 1305 eEquity of any change in her financial situation or investment objectives that might require a review or revision of her portfolio.

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

1305 eEquity provides Clients with financial advice that is based on Modern Portfolio Theory (MPT). MPT attempts to maximize a portfolio's expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, by selecting the proportions of various asset classes rather than selecting individual securities.

To employ MPT properly, one must start with an accurate determination of an individual's objective and subjective tolerance for risk. Achieving accuracy requires sophisticated algorithms applied to more detailed questions than are typically asked by advisors. Based on this risk analysis, 1305 eEquity seeks to create an individualized investment plan using the optimal asset classes in which to invest, the most efficient securities to represent each of those asset classes, and the ideal mix of asset classes based on the Client's specific risk tolerance. 1305 eEquity uses Mean Variance Optimization to rigorously evaluate every possible combination of the following eleven asset classes: US equities, foreign developed markets equities, emerging markets equities, dividend growth equities, real estate, natural resources, treasury inflation protected securities (TIPS), municipal bonds, corporate bonds, emerging markets bonds and US government bonds. Mean Variance Optimization uses the expected return and volatility for each asset class and the covariance among asset classes to find the combination that delivers the highest possible return for any given standard deviation of a portfolio's returns.

RISK CONSIDERATIONS

1305 eEquity cannot guarantee any level of performance or that any Client will avoid a loss of Account assets. **Any investment in securities involves the possibility of financial loss that Clients should be prepared to bear.**

When evaluating risk, financial loss may be viewed differently by each Client and may depend on many different risk items, each of which may affect the probability of adverse consequences and the magnitude of any potential losses. The following risks may not be all-inclusive, but should be considered carefully by a prospective Client before retaining 1305 eEquity's services. These risks should be considered as possibilities, with additional regard to their actual probability of occurring and the effect on a Client if there is in fact an occurrence.

Market Risk – The price of any security or the value of an entire asset class can decline for a variety of reasons outside of 1305 eEquity's control, including, but not limited to, changes in the macroeconomic environment, unpredictable market sentiment, forecasted or unforeseen economic developments, interest rates, regulatory changes, and domestic or foreign political, demographic, or social events. If a Client has a high allocation in a particular asset class it may negatively affect overall performance to the extent that the asset class underperforms relative to other market assets. Conversely, a low allocation to a particular asset class that outperforms other asset classes in a particular period will cause that Client Account to underperform relative to the overall market.

Advisory Risk – There is no guarantee that 1305 eEquity's judgment or investment decisions about particular securities or asset classes will necessarily produce the intended results. 1305 eEquity's judgment may prove to be incorrect, and a Client might not achieve her investment objectives. Customer may also make future changes to the investing algorithms and advisory services that it provides. In addition, it is possible that Clients or 1305 eEquity itself may experience computer equipment failure, loss of internet access, viruses, or other events that may impair access to 1305 eEquity's software based financial advisory service. 1305 eEquity and its representatives are not responsible to any Client for losses unless caused by 1305 eEquity breaching its fiduciary duty.

Volatility and Correlation Risk – Clients should be aware that 1305 eEquity's asset selection process is based in part on a careful evaluation of past price performance and volatility in order to evaluate future probabilities. However, it is possible that different or unrelated asset classes may exhibit similar price changes in similar directions which may adversely affect a Client, and may become more acute in times of market upheaval or high volatility. **Past performance is no guarantee of future results, and any historical returns, expected returns, or probability projections may not reflect actual future performance.**



Liquidity and Valuation Risk –High volatility and/or the lack of deep and active liquid markets for a security may prevent a Client from selling her securities at all, or at an advantageous time or price because 1305 eQuity and the Client’s Broker may have difficulty finding a buyer and may be forced to sell at a significant discount to market value. Some securities that hold or trade financial instruments may be adversely affected by liquidity issues as they manage their portfolios. While 1305 eQuity values the securities held in Client Accounts based on reasonably available exchange-traded security data, 1305 eQuity may from time to time receive or use inaccurate data, which could adversely affect security valuations, transaction size for purchases or sales, and/or the resulting advisory fees paid by a Client to 1305 eQuity.

Credit Risk – 1305 eQuity cannot control and Clients are exposed to the risk that financial intermediaries or security issuers may experience adverse economic consequences that may include impaired credit ratings, default, bankruptcy or insolvency, any of which may affect portfolio values or management. This risk applies to assets on deposit with the Broker utilized by 1305 eQuity, notwithstanding asset segregation and insurance requirements that are beneficial to Broker clients generally. In addition, exchange trading venues or trade settlement and clearing intermediaries could experience adverse events that may temporarily or permanently limit trading or adversely affect the value of Client securities. Finally, any issuer of securities may experience a credit event that could impair or erase the value of the issuer’s securities held by a Client.

Legislative and Tax Risk - Performance may directly or indirectly be affected by government legislation or regulation, which may include, but is not limited to: changes in investment advisor or securities trading regulation; change in the U.S. government’s guarantee of ultimate payment of principal and interest on certain government securities; and changes in the tax code that could affect interest income, income characterization and/or tax reporting obligations 1305 eQuity does not engage in financial or tax planning, and in certain circumstances a Client may incur taxable income on her investments without a cash distribution to pay the tax due.

Foreign Investing and Emerging Markets Risk - Foreign investing involves risks not typically associated with U.S. investments, and the risks may be exacerbated further in emerging market countries. These risks may include, among others, adverse fluctuations in foreign currency values, as well as adverse political, social and economic developments affecting one or more foreign countries. In addition, foreign investing may involve less publicly available information and more volatile or less liquid securities markets, particularly in markets that trade a small number of securities, have unstable governments, or involve limited industry. Investments in foreign countries could be affected by factors not present in the U.S., such as restrictions on receiving the investment proceeds from a foreign country, foreign tax laws or tax withholding requirements, unique trade clearance or settlement procedures, and potential difficulties in enforcing contractual obligations or other legal rules that jeopardize shareholder protection. Foreign accounting may be less transparent than U.S. accounting practices and foreign regulation may be inadequate or irregular.



Inflation, Currency, and Interest Rate Risks - Security prices and portfolio returns will likely vary in response to changes in inflation and interest rates. Inflation causes the value of future dollars to be worth less and may reduce the purchasing power of an investor's future interest payments and principal. Inflation also generally leads to higher interest rates, which in turn may cause the value of many types of fixed income investments to decline. In addition, the relative value of the U.S. dollar-denominated assets primarily managed by 1305 eQuity may be affected by the risk that currency devaluations affect Client purchasing power.



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Item 9 Disciplinary Information

Like all registered investment advisors, 1305 eEquity is obligated to disclose any disciplinary event that might be material to any Client when evaluating our services.

We do not have any material legal, financial, regulatory, or other “disciplinary” item to report to any Client. This statement applies to our firm and to every employee of our firm.



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Item 10 Other Financial Industry Activities and Affiliations

1305 eEquity utilizes E*Trade Financial to effect transactions on behalf of our Clients. E*Trade Financial is a broker-dealer registered with the Financial Industry Regulatory Authority (FINRA) and the U.S. Securities & Exchange Commission (SEC), and is used as a custodian to 1305 eEquity's Clients. 1305 eEquity instructs the Clearing Firm, (E*Trade Financial), on behalf of itself, where applicable, to provide execution services for Clients' Account transactions pursuant to the authority the Client has given under the applicable Account Agreement.

1305 eEquity also uses Legacy Texas Bank as a custodial account on behalf of our Clients. Legacy Texas Bank is a Federal Deposit Insured Corporation (FDIC) operating under the oversight of the Office of the Comptroller of Treasury (OCC), Financial Industry Regulatory Authority (FINRA), and other various bank regulatory bodies.

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

1305 eEquity's paramount ethical, professional, and legal duty is to act at all times as a fiduciary to its Clients. This means that 1305 eEquity puts the interests of its Clients *ahead of its own*, and carefully manages for any perceived or actual conflict of interest that may arise in relation to its advisory services. 1305 eEquity has adopted a Code of Ethics, which is designed to ensure that we meet our fiduciary obligation to Clients, enhance our culture of compliance within the firm, and detect and prevent any violations of securities laws.

1305 eEquity's Code of Ethics is detailed in a Statement of Policies and Procedures ("Statement"), which establishes standards of conduct for 1305 eEquity's officers and employees ("Supervised Persons" as defined in the Statement) and is consistent with the Code of Ethics requirements of Rule 204A-1 under the Investment Advisers Act of 1940, as amended. The Statement includes general requirements that all Supervised Persons comply with their fiduciary obligations to Clients and applicable securities laws, and specific requirements relating to, among other things, personal trading, insider trading, conflicts of interest, and confidentiality of client information.

Each new 1305 eEquity employee receives a copy of the Statement when hired by 1305 eEquity. 1305 eEquity sends copies of any amendments to the Statement to all Supervised Persons, who must acknowledge in writing having received the Statement and the amendments. Annually or as otherwise required, each Supervised Person must confirm to 1305 eEquity that he or she has complied with the Statement during such preceding period.

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Item 12 Brokerage Practices

1305 eEquity acts as an introducing broker-dealer in effecting securities transactions for Clients' Accounts in which E*Trade Financial provides trade execution and clearing services (see Item 10).

1305 eEquity seeks the best overall execution of transactions for Client Accounts consistent with its judgment as to the business qualifications of E*Trade Financial. 1305 eEquity obtains information as to the general level of commission rates being charged by the brokerage community from time to time, and will periodically evaluate the overall reasonableness of brokerage commissions paid on Client transactions by reference to such data to ensure competitive commission rates. "Best execution" means the best overall qualitative execution, not necessarily the lowest possible commission cost. Accordingly, the factors that 1305 eEquity considers when selecting or recommending Brokers are matters that directly benefit Client Accounts, and consistent with obtaining the best execution of their transactions. These factors include: execution capability and available liquidity; timing and size of particular orders; commission rates; responsiveness; trading experience; reputation, integrity and fairness in resolving disputes; quality of their application programming interfaces and technology; and other factors.

Unlike many investment advisors, 1305 eEquity does *not* engage in any "soft dollar" practices involving the receipt of research or other brokerage service in relation to client commission money, nor do we receive any research or other products in connection with Client transactions. 1305 eEquity also does not use Client commission money to compensate or otherwise reward any brokers for client referrals.

In the interest of better trade execution, 1305 eEquity may, but is not required to, aggregate orders for a Client's Account with orders of other Clients. 1305 eEquity may aggregate securities sale and purchase orders for a Client with similar orders being made contemporaneously for other Client Accounts. In such event, the average price of the securities purchased or sold in such a transaction may be determined and a Client may be charged or credited, as the case may be, the average transaction price. As a result, however, the price may be less favorable to the Client than it would be if similar transactions were not being executed concurrently for other Accounts.



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Item 13 Review of Accounts

1305 eEquity's Clients may receive periodic e-mail communications describing portfolio performance, Account information, and product features.

1305 eEquity's financial advisor service assumes that a portfolio created using MPT-based techniques 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. 1305 equity 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. 1305 eEquity also conducts reviews when material changes may have occurred to a Client's portfolio or investment objectives. 1305 eEquity considers tax implications and the volatility associated with each of our chosen asset classes when deciding when and how to rebalance.

On a quarterly basis, 1305 eEquity may contact each Client to review and update the profile information they previously provided. 1305 eEquity 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 for the 1305 eEquity support team. Currently the 1305 eEquity team members whose tasks include supervising, arranging and responding to these notifications, confirmations and reviews are: the Chief Compliance Officer with help from Client Services.

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Item 14 Client Referrals and Other Compensation

1305 eQuity reserves the right to run promotional campaigns in the future to attract Clients to open Accounts with the company.

A 1305 eQuity promotional campaign may create an incentive for a third-party or other existing Client to refer prospective Clients to Company, even if the third-party would otherwise not make the referral. These arrangements may also create a conflict of interest for a Client to maintain a certain level of assets managed through 1305 eQuity if doing so would result in eligibility to receive an incentive, bonus or additional compensation.

1305 eQuity reserves the right to pay pre-determined fees to third-parties for open a new Client account(s) at 1305 eQuity, which may be in the form of so-called CPM, CPC or CPA arrangements (respectively, impressions, clicks or actions through other websites).

1305 eQuity reserves the right to engage solicitors for whom it pays for Client referrals in the future. 1305 eQuity would disclose this practice in writing to the affected Clients and would comply with the requirements of Rule 206(4)-3 under the Investment Advisers Act of 1940, as amended, to the extent required by applicable law.



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Item 15 Custody

1305 eEquity does not maintain custody of any Client funds or securities. 1305 eEquity provides instructions to E*Trade Financial and/or Legacy Texas Bank regarding the investment of the Client's assets (see Item 10).

Each 1305 eEquity Client will receive Account information, including trade confirmations and quarterly account statements, directly from E*Trade Financial and/or Legacy Texas Bank . Each Client should carefully review this information and compare it with information provided by 1305 eEquity when they are evaluating Account performance, securities holdings, and transactions. 1305 eEquity reconciles trading information with E*Trade Financial on a regular basis and provides Account information to Clients quarterly. A Client may experience differences in the information due to pending transactions, dividends, corporate actions, cash movements or withdrawals, or other activity.



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Item 16 Investment Discretion

1305 eEquity requires that an Account Agreement be completed by a Client who decides to retain 1305 eEquity as their investment advisor. Under the terms of the Account Agreement, 1305 eEquity assumes full discretionary trading and investment authority over the Client's assets held with the Broker. This means that 1305 eEquity is given full authority under a power of attorney arrangement to select the timing, size, and identity of securities to buy and sell for the Client. Additional information about the Account Agreement can be found in Items 4 and 7, above.

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Item 17 Voting Client Securities

1305 eQuity, as a matter of policy and as a fiduciary to our clients, has responsibility for voting proxies for portfolio securities consistent with the best economic interests of the clients. Our firm maintains written policies and procedures as to the handling, research, voting and reporting of proxy voting and makes appropriate disclosures about our firm's proxy policies and practices. Our policy and practice includes the responsibility to monitor corporate actions, receive and vote client proxies and disclose any potential conflicts of interest as well as making information available to clients about the voting of proxies for their portfolio securities and maintaining relevant and required records. Clients retain the right to direct vote on any security or issue concerning that security. If the client wishes to exercise that right on any security, they must contact 1305 eQuity in writing. Clients may request information regarding how 1305 eQuity voted a client's proxies, and clients may request a copy of the firm's proxy policies and procedures by emailing staff@1305eQuity.com.



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Item 18 Financial Information

This Item is not applicable because 1305 eQuity does not require or solicit the prepayment of any advisory fees, and does not have any adverse financial condition that is reasonably likely to impair our ability to continuously meet our contractual commitments to our Clients.

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Item 19 Supervisors and Team Members

1305 eEquity's discretionary investment advice to clients is provided by its Chief Compliance Officer Quincy Atkinson and its day-to-day operations is managed by its Vice President, Chris D. Bentley.

Quincy Atkinson

Education

BS, California State University-San Bernardino

Business Background

Chief Compliance Officer, 1305 eEquity 2016-Present

Director of Business Development, Ophde Advisors 2014-2015

Financial Advisor, Morgan Stanley Wealth Management 2013-2014

Disciplinary Information

None

Other Business Activity

Loan Officer, Sherman Bridge Lending 2016-Present

Supervision:

Chris D. Bentley, Vice President (see below)

Chris D. Bentley

Education

BS, Henley-Putnam University

Business Background

Vice President, 1305 eEquity 2016-Present

BSA Officer, First National Bank of Wichita Falls, TX 2013-2016

Disciplinary Information

None

Other Business Activity

Realtor, Rogers Healy and Associates 2013-Present

Supervision:

N/A

