

March 24, 2020

FundTraderPro

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*Please note that this brochure has not been approved by the Securities & Exchange Commission or by any state securities authority. This firm is registered with the SEC and notice filed in one or more states; **registration does not mean approval or verification by those regulators.** More information about the firm is at Investment Adviser Public Disclosure : www.adviserinfo.sec.gov.*

2A: Brochure: Item 2: Material Changes : *If we amend this disclosure brochure, we are to send you either a new copy of the brochure or at least this item 2 describing the changes made so you can decide if you want us to send you a complete, new copy. A summary of material changes is:*

☐ attached as an exhibit to or

☐ included here as part of this updated brochure

or: ☒ No summary of material changes is required because there have been no material changes to this adviser's brochure since its last annual updating amendment.

The changes made are:

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Item 4 Advisory Business

A. General Description of the Firm

Fund Trader Pro (FTP) is an automated investment service registered with the Securities and Exchange Commission ("SEC"). FTP is a registered LLC, organized in Ohio, and effective 6/29/2015. FTP is a privately held company owned in its entirety by William E. DeShurko and Michael J. Holka. FTP provides portfolio management advice for client 401(k) and other employer sponsored retirement plan accounts. Additional information about FTP's products, structure and directors is provided on Part 1 of FTP's Form ADV which is available online at <http://www.adviserinfo.sec.gov>. We encourage visiting our website www.fundtraderpro.com for additional information.

B. Summary of Fund Trader Pro's Advisory Services

FTP offers a unique automated investment service for investors in 401(k), 403(b) and other defined contribution retirement plans. Recommendations are based on historic and well-known market theories that makes it possible for anyone without regard to portfolio size to access state-of-the-art portfolio management. Each portfolio recommendation is designed to maximize long term returns and minimize major draw downs and is customized based on the investment options made available to the client via their employer sponsored retirement plan. We create an investment strategy and advise Clients' as to when and what changes to make to their retirement portfolio. Advice is provided via FTP web site, email, twitter and/or direct texts as provided in the account opening documentation.

Specific recommendations include: 1) the optimal fund or funds in which to invest, and in what percentage 2) which fund or funds to direct new contributions, 3) the most appropriate time to rebalance the Client's portfolio.

C. Tailored Services and Investment Restrictions

FTP tailors its recommendations to the individual retirement plan options available to each of its Clients.

FTP is a software based financial advisor service whose goal is to use its advanced algorithms, and technical analysis which are based on academic behavioral economics research, to maximize an investor's potential retirement account balance.

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Clients need to understand that FTP's long-term investment process may conflict with an individual's short-term risk tolerances. For more on suitability please see our company website.

Clients cannot limit investment options beyond the limitations of their retirement plan.

D. Wrap Fee Programs

FTP Does not participate in wrap fee programs.

E. Assets Under Management

As disclosed in Fund Trader Pro's Form ADV Part 1, Fund Trader Pro does not manage client assets that we custody directly. Clients receive periodic investment advice and specific investment recommendations via email alerts and posts on our website at

www.Fundtraderpro.com

Item 5 Fees and Compensation

A. Advisory Fees

Fund Trader Pro is compensated for its advisory services by charging a flat fee for our advice. Fund Trader Pro 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 Fund Trader Pro. In addition, Fund Trader Pro may reduce or waive its fees for the Accounts of some Clients without notice to, or fee adjustment for, other Clients.

Fund Trader Pro's software-based investment advisor service charges a monthly fee of \$20.

B. Billing

Fund Trader Pro's fees are charged in advance. We offer secure credit card payments through Stripe credit card processing.

C. Additional Fees

FTP does not custody client assets and therefore does not control fees and expenses associated with their retirement account. Clients should contact their employer for a list of fees associated with their retirement plan.

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A minority of mutual funds will charge a surrender fee if a fund is not held for a minimum time period. At FTP we try and avoid funds with hold periods (minimum hold time to avoid the surrender fee). There is no guarantee that we will be able to do so with the large number of mutual funds used across different retirement plans. FTP is not liable should such a fee be incurred. We strongly urge clients that see such a charge to notify us immediately. We will eliminate any fund with a surrender fee that requires a hold period greater than 7 days from investment consideration.

In general, most funds' charges are short term (7 days) and should not be a factor. A very small number of funds require a 30 day hold period. FTP's proprietary program sets a 1 month hold period as a minimum for any purchase. However, exceptions may occur when market conditions dictate a sale in a shorter time period. We feel that any surrender charge incurred would be minimal compared to market losses that we are attempting to avoid. Of course, there is no guarantee that future results will meet that goal.

D. Fee Payment

Fees are charged monthly, in advance. Accounts must be current to receive investment recommendations for that month. Clients can terminate the service at any time. If receipt of notice to terminate is received at least 10 days prior to recommendations being sent out for the month, client will receive full refund of their monthly fee.

E. Additional Compensation

FTP receives no compensation other than the client fee. We receive no payments from any investment that we recommend, thus eliminating any and all possible conflicts of interest in the advice that we provide.

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

Fund Trader Pro does not charge performance-based fees. There are no conflicts of interest that could be presented by having custody of client accounts. We provide an advice for fee service only. Our advisory fees are only charged as disclosed above in Item 5.

Item 7 Types of Clients

There is no minimum amount required to open and maintain a Fund Trader Pro Account. As a result of the automation associated with offering its services online, Fund Trader Pro makes it possible for retirement account investors to access its service with much lower account minimums than normally available in the industry.

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At any time, a Client may terminate an Account without incurring termination fees. Investors evaluating Fund Trader Pro's software based financial advisor service should be aware that Fund Trader Pro's relationship with Clients is likely to be different from the "traditional" investment advisor relationship in several aspects:

1. Fund Trader Pro is a software based financial advisor which means each Client must acknowledge her ability and willingness to conduct her relationship with Fund Trader Pro on an electronic basis. Under the terms of the Account Agreement, each Client agrees to receive all Account information and Account documents (including this Brochure), and any updates or changes to same, through her access to the Site and Fund Trader Pro's electronic communications. Unless noted otherwise on the Site or within this Brochure, Fund Trader Pro's advisory service, the signature for the Account Agreement, and all documentation related to the advisory services are managed electronically. Fund Trader Pro does make individual representatives available to discuss servicing matters with Clients.

2. To provide its advisory services, Fund Trader Pro may collect information from each Client, including specific information about her investing profile such as financial situation, investment experience, and investment objectives. Fund Trader Pro maintains this information in strict confidence subject to its Privacy Policy, which is provided on the Site. The software based financial advisor service includes mutual funds and ETF's that are provided to Clients' in their 401(k) or other retirement plan. Fund Trader Pro is not involved in your plan's investment options. Our service is limited to direct specific advice as to which of the many options available to the client, the client should own at any one time. Selection criteria is described below.

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

For its software based financial advisor service, Fund Trader Pro provides Clients with financial advice that is based on proven investment strategies.

FTP believes that there is a retirement crisis in the United States. Primarily, but not exclusively due to demographics – the aging of a very large segment of the population coupled with increasing longevity. Our social welfare safety net is and will continue to be stretched to the limits of solvency. Most certainly either benefits will be cut, or co-pays and premiums will increase.

In addition, multiple industry studies suggest that, in general, the American worker has not saved enough to maintain their lifestyle throughout retirement.

And yet popular investment advice centers on mitigating **short term risk** at the expense of maximizing long term investment returns. At FTP we use a proprietary momentum model designed to keep investors in the market when the market is trending upwards and move into money market or short-term bond investment funds when the market is trending downward. Investment literature is full of studies that document the "momentum anomaly" in investing.

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One of the founders of FTP, William DeShurko has received the prestigious Charles H. Dow award from the Market Technicians Association in 2008. DeShurko, along with Professors Stanley Eakins and Samuel Tibbs authored "Using Style Index Momentum to Generate Alpha". The paper documented the superior returns and risk profiles investors could achieve using a momentum model to rotate investment capital between different Russell indexes. Many mutual funds today benchmark their returns against these same Russell indexes. The paper can be found here: <http://docs.mta.org/pdfs/2008DowAwardWinner.pdf>

Further documentation on the effectiveness of using a momentum model to develop an investment strategy can be found in the book, [Dual Momentum Investing: An Innovative Strategy for Higher Returns with Lower Risk](#) by [Gary Antonacci](#)

For each 401(k) plan invested in by our clients, FTP back tests and models a momentum model designed to be the most effective based on the client's investment choices within their own plan. We do not use a generic trading model and simply hope it works across all plans. Once a model is chosen that plan will be evaluated on a regular basis, based on the results of back testing with that plans investment choices. Typically plan holdings are evaluated every 1 - 6 months. Regardless of model used all plans are evaluated, but not **necessarily traded on a regular** basis.

More information can be found at our web site: www.FundTraderPro.com under the tab, "How We Do It"

We feel that the desire to be in the best performing investment option at any one time is consistent among all investors. It is also consistent with a long-term goal of maximizing retirement account balance. Risk is mitigated across all investors by defining "best" performing as a positive return. In the case of a long-term market decline, our proprietary model will keep investors out of the stock market entirely, until positive momentum returns.

Tax-Loss Harvesting

Tax-loss harvesting is a technique used to lower your taxes while maintaining the expected risk and return profile of your portfolio. It harvests previously unrecognized investment losses to offset taxes due on your other gains and income.

FTP DOES NOT use tax loss harvesting as part of our management models. Since our service is designed for tax deferred accounts, tax loss harvesting is not an issue. We strongly advise against using the FTP models in a non-tax deferred account.

RISK CONSIDERATIONS

FTP 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.**

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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 FTP'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 FTP'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. While the goal of a momentum model is to be invested in the asset classes that are performing better within a client's account options, ***there is no guarantee that the objective will be met.*** What our studies show, is that we consistently will be in funds that perform relatively well to other options, and that we can avoid the really bad performances that accompany long term market sell offs.

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

Volatility and Correlation Risk – Clients should be aware that FTP's asset selection process is based in part on a careful evaluation of past price performance in order to evaluate future performance. It is probable that different 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.**

Credit Risk – FTP 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 any Broker utilized by Client, 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

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experience a credit event that could impair or erase the value of the issuer's securities held by a Client. FTP cannot affect or limit such risk as we do not neither offer proprietary investments nor even select the investments available to a client within their own 401(k) plan.

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.

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 FTP may be affected by the risk that currency devaluations affect Client purchasing power.

Mutual Fund Risk – Most 401(k) and other self-directed retirement accounts rely primarily on mutual fund investments. While mutual funds offer many investor advantages such as diversification, style attributes and transparency, they are not ideal for FTP purposes. Specifically, most mutual fund companies will deem FTP's trading within a general overview of a "market timing activity". Mutual fund companies will restrict trading in their funds over the course of a calendar year. At FTP we will be aware of most fund trading restrictions. However, it is not possible to follow all funds at all times. Occasionally our activities will trigger what we call a "nasty gram" letter that will say that your account has been flagged and to stop your "excessive" trading. If you do receive such a notice we do ask that you notify our customer service department so we can note the potential restriction for your account. Other than the limits on trading we have found that mutual funds offer strong momentum tendencies and can provide positive results for our clients.

Risks Associated Specifically with Fund Trader Pro's Momentum Models – A specific risk of any momentum-based investment model is the risk of being "whipsawed". Whipsaw refers to times

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when once a fund is chosen, its return becomes negative in either relative terms to the other options or in real return terms. Conversely, once a fund is sold its performance could accelerate and be superior to the fund that replaced it in a client's portfolio. Whipsawing will happen. Simply put, if momentum, or any one of multiple investment strategies (including buy and hold strategies) worked perfectly – we would all be rich! Whipsawing can be a serious problem and can if allowed to continue cause real losses to a client's portfolio. AT FTP we follow our portfolios performance and monitor them for effectiveness. **At the advisor's discretion**, if we feel that the market is not conducive to our strategy we will go to a buy and hold diversified strategy if we feel it is in the clients' best interest. We feel that should this happen it will be a short-term market reaction. Any changes to strategy will be posted on our web site in a timely fashion.

Market Loss – At FTP we do utilize a “dual momentum” strategy. That is, we first pick one or more funds that exhibit current strong relative strength to other investment choices. Second, we only invest in funds that exhibit positive momentum. During sustained market sell offs all equity investments may have a negative return based on our look back criteria. We do not pick “the best of the worst”, i.e. a fund with the lowest loss just for the sake of diversification. By avoiding all down trending funds, we feel we can significantly lower the short-term investment risk to our clients, by being entirely out of the market during sustained market downturns. We provide examples of back tested data through the 2000-2002 and 2008 downturns when fund data is available.

Relative Performance – FTP does not attempt to “beat the market” or any other bench mark over the short run. In fact, we feel one of the strongest plusses of our models is that they do not correlate highly to the overall stock market. We do suggest that some investors might like to pair our investment recommendations with investing in an index fund for strategy diversification.

Form ADV Part 2 Client Brochure**Item 9 Disciplinary Information**

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

We do not have any 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.

Item 10 Other Financial Industry Activities and Affiliations

FTP is a private independently owned SEC registered Investment Advisor. William DeShurko, 50% owner of FTP is also the managing partner and Investment Advisor Representative of 401 Advisor, LLC. Mr. DeShurko is also a registered representative of Ceros Financial Services and is a licensed insurance agent in the State of Ohio. Individuals interested in services beyond the scope of FTP may contact Mr. DeShurko directly via email at bill@401advisor.com. Currently 401 Advisor services are only offered to new clients in the state of Ohio.

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

FTP’s paramount ethical, professional, and legal duty is to act at all times as a fiduciary to its Clients. This means that FTP 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. FTP 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.

FTP’s Code of Ethics is detailed in a Statement of Policies and Procedures (“Statement”), which establishes standards of conduct for FTP’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 FTP employee receives a copy of the Statement when hired by FTP. FTP 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 FTP that he or she has complied with the Statement during such preceding period.

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Under the Statement, FTP's directors and Supervised Persons may personally invest in the mutual funds recommended to our clients.

Item 12 Brokerage Practices

Unlike many investment advisors, FTP 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. Since we only provide advice, not custodial service, there are no commissions, marketing or "shelf space" fees paid to FTP. AT FTP our only compensation is that which is paid to us from our clients. We feel that we are truly objective and free from conflict in the advice we offer.

Item 13 Review of Accounts

Since accounts are custodied with their individual company's 401(k) provider, all account information is typically available via the provider's own web site or account portal.

FTP does not provide separate account performance reporting.

Clients receive periodic e-mails describing investment recommendations, and market related information. Additional market and investment commentary will be posted and updated on the FTP web site and/or blog.

Item 14 Client Referrals and Other Compensation

FTP expects from time to time to run promotional campaigns to attract Clients to open Accounts on the Site. These promotions may include additional Account services or products offered on a limited basis to select Clients, more favorable fee arrangements, and/or reduced or waived advisory fees for Clients.

These arrangements may create an incentive for a third-party or other existing Client to refer prospective Clients to FTP, even if the third-party would otherwise not make the referral.

FTP may also pay pre-determined fees to third-parties for driving new users to FTP, which may be in the form of so-called CPM, CPC or CPA arrangements (respectively, impressions, clicks or actions through other websites).

FTP may engage solicitors whom it pays for Client referrals. If so FTP discloses this practice in writing to the affected Clients and complies with the requirements of Rule 206(4)-3 under the Investment Advisers Act of 1940, as amended, to the extent required by applicable law.

Item 15 Custody

FTP does not maintain custody of any Client funds or securities. FTP provides instructions to the client directly through posts on our web site, emails, and /or text messages regarding the investment recommendations of the Client's assets.

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Trade confirmations, balances and investment performance is typically available by the client's 401(k) or other retirement plan provider.

Item 16 Investment Discretion

FTP does not assume discretionary trading and investment authority over the Client's assets held with their retirement account provider or custodian. All trades are executed by the client at the client's discretion.

Item 17 Voting Client Securities

FTP as a matter of policy does not have responsibility for voting proxies for portfolio securities.

Item 18 Financial Information

This Item is not applicable because FTP does not require or solicit the prepayment of advisory fees more than 90 days in advance and does not custody client assets.

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Client Brochure Supplement

March 24, 2020

This Brochure Supplement provides information about certain Fund Trader Pro employees listed below that supplements the Fund Trader Pro Brochure you should have received above. Please contact Fund Trader Pro at (937) 434-1790 or FTPsupport@FundTraderPro.com if you did not receive FTP's Brochure or if you have any questions about the contents of this Brochure Supplement. Additional information about William DeShurko is available on the SEC's website at www.adviserinfo.sec.gov.

FTP's investment advice is provided by William DeShurko. Mr. DeShurko has been in the investment advisory business since 1994. He is also known as a financial author and contributor to multiple financial media outlets. Mr. DeShurko's proprietary investment model is responsible for the day-to-day advice provided to Clients.

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William DeShurko, born 1957

Education

BA, University of Rochester, NY 1980

Business Background

1994 – Present President, DeShurko Investment Services, Inc

2004 – present Managing Member, 401 Advisor, LLC

1987 – Present – Licensed Life, Health Agent in Ohio

2014 – 2019 Board Member and Finance Committee Member, Homefull, Inc.

2007 – Author, “The Naked Truth About Your Money”

Disciplinary Information

None

Other Business Activity

None

Additional Compensation

Freelance Financial Writer

Supervision

Mr. DeShurko serves as the Chief Compliance Officer, and as such is not subject to additional supervision.

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Michael Holka, born 1963

Education

BS, Ferris State College, MI 1985

Business Background

1998 – 2005 Managing Member, Great Lakes Technology Partners, LLC

1998 – Present President, Advanced Computing and Management, Corp

Disciplinary Information

None

Other Business Activity

None

Additional Compensation

None

Supervision

Mr. Holka is supervised by Mr. DeShurko