

Part 2A of Form ADV: Firm Brochure

**Algo Advisors**  
**7525 Bluebill Pl Fort Worth, TX 76123**

This brochure provides information about the qualifications and business practices of Algo Advisors ("Adviser"). If you have any questions about the contents of this brochure, or if you would like to request a copy of this brochure free of charge, please contact us at 949-533-1885 or [KMurphy@AlgoAdvisors.com](mailto:KMurphy@AlgoAdvisors.com)

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority.

Adviser is a registered investment adviser with the United States Securities and Exchange Commission ("SEC"). Registration of an investment adviser does not imply any level of skill or training. The oral and written communication of an adviser provide you with information about which you determine to hire or retain an adviser. Additional information about Adviser is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **Material Changes**

Registered investment advisers are required to disclose all material changes of fact regarding its brochure since its last annual update. This update makes certain material changes.

We will provide you with a new brochure as necessary based on any material changes or new information, at any time, and without charge. Our brochure may be requested free of charge by contacting us at 214-906-7699 or [mmccain@algo-advisors.com](mailto:mmccain@algo-advisors.com).

## **Table of Contents**

Item 1 – Cover Page
Item 2 – Material Changes
Item 3 – Table of Contents
Item 4 – Advisory Business
Item 5 – Fees and Compensation
Item 6 – Performance-Based Fees and Side-By-Side Management
Item 7 – Types of Clients
Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss
Item 9 – Disciplinary Information
Item 10 – Other Financial Industry Activities and Affiliations
Item 11 – Code of Ethics, Participation in Client Transactions and Personal Trading
Item 12 – Brokerage Practices
Item 13 – Review of Accounts
Item 14 – Client Referrals and Other Compensation
Item 15 – Custody
Item 16 – Investment Discretion
Item 17 – Voting Client Securities
Item 18 – Financial Information

## **Advisory Business**

Adviser, Algo Advisors, is 100% owned by Marc McCain and is an advisory services firm.

### **Model Portfolio Program**

Adviser offers an automated Model Portfolio Program via the Adviser website and mobile Applications. Adviser begins by assessing a Client's investment profile through an online questionnaire via the Adviser website and mobile applications. The profile questionnaire gauges factors such as the Client's financial situation, investment time horizon, tolerance for risk, investment income needs, cash flow needs, and years of investment experience. Based on the information obtained from the profile questionnaire the Client's investment objectives are determined. Adviser then provides a recommended model portfolio allocation ("model portfolios") designed to meet those stated Client objectives. Clients are also provided electronically with an Investment Policy Statement that summarizes the Client's stated investment objectives, risk tolerance, investment time horizon, model portfolio asset allocation, investment limits, and process for monitoring and review.

Adviser will ensure that the following conditions are met: 1) Adviser will manage the model portfolios on the basis of the Client's stated financial situation and investment objectives; 2) each Client will receive account statements with a description of all account activity at least quarterly prepared by Interactive Brokers, who act as Adviser's clearing firm and qualified custodian maintaining custody of the Client's portfolio assets; and, 3) each Client will retain certain indicia of ownership of the securities and funds in the account, e.g., the ability to withdraw funds, among others.

### **Asset Allocation of ETFs Program**

Adviser offers an automated Asset Allocation of ETFs via the Adviser website and mobile applications. This allocation is based on an automated algorithm trading solution.

Adviser recommendations are comprised of a mix of low-cost exchange traded funds ("ETF's"), and stocks. This strategy focuses on Modern Portfolio Theory, which provides the framework for combining securities in a portfolio to attempt to generate the highest returns possible at a given level of risk. This is achieved through a focus on building algorithmic portfolios with asset classes and securities that should move independently of each other. Adviser provides Clients with individual, password protected, login credentials to its website and mobile application where Clients can view their holdings and their account history as well as access to all account related documents. Adviser rebalances the model portfolios on a periodic basis to realign the portfolio to the desired weighting across investments.

## **Fees and Compensation**

Adviser's automated Advisory Programs, as described above, are offered for an asset under management fee ("AUM"). Allocation selected by clients are charged 40 basis points per month. These fees include payment to a monthly Algo trading technology solution and payment to a Health Savings solution.

All of Adviser's fees are inclusive of clearing firm charges, brokerage commissions, transaction fees, and other related costs and expenses ("pass-through charges"), which are incurred through the investment of Client assets by Adviser. ETFs may charge management fees, which are disclosed in a fund's prospectus and included in the share price of the ETFs. Such charges are included in the Advisors AUM charge.

## **Types of Clients**

Adviser generally offers its automated Advisory Programs to individuals. There is no minimum account size for the automated Advisory Programs.

## **Methods of Analysis, Investment Strategies and Risk of Loss**

For its automated Advisory Programs, Adviser begins with a preset asset allocation based on the Client's investment profile and stated investment objectives. Adviser's investment strategy focuses on building diversified model portfolios using Modern Portfolio Theory which provides the framework for combining securities in a portfolio to attempt to generate the highest returns possible at a given level of risk. This is achieved through a process of building portfolios with different asset classes and securities to reduce risk. The model portfolios constrain the weightings of individual holdings to ensure a fully diversified allocation.

Investing in securities involves risk of loss that Clients should be prepared to bear. All securities investments can potentially result in a total loss of the investment. Specific and material risks associated with Adviser's automated Advisory Programs include, but are not limited to, market risk where Adviser's portfolios are generally positively correlated with the stock market indices. An overall downturn in the stock market will generally result in losses in Adviser's model portfolios.

## **Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to evaluation of Adviser or the integrity of Adviser's management. Adviser has two (2) previous issues with Self-regulatory organizations.

1. Adviser was censured in the finality of a case with the CBOE. The CBOE brought charges against Adviser which were thrown out by the SEC leaving one minor AML violation.
2. Adviser accepted an AWC with FINRA for a Private Securities Transaction ("PST") violation. Adviser was charged by FINRA with a violation of the "Private Securities Transaction" ("PST") Rule while being the CEO of a Firm. On advice of counsel, Adviser was told that it was not a PST, and such did not need to inform the existing Firm. Adviser used Council and their advice throughout the entire investment process.

## **Other Financial Industry Activities and Affiliations**

Algo Advisor's management persons are not affiliated with any other investment firm. Mr. Murphy does own a consulting firm, DBCR Consultants.

## **Code of Ethics, Participation in Client Transactions and Personal Trading**

Pursuant to SEC Rule 204A-1 of the Investment Advisers Act of 1940, Adviser has adopted a Code of Ethics for all supervised persons of the firm describing its fiduciary duty to its Clients. The Code of Ethics includes provisions relating to the confidentiality of Client information, prohibitions on insider trading, rumor mongering, and the acceptance of significant gifts. It also addresses personal securities trading procedures, among other things. All supervised persons at Adviser must acknowledge the terms of the Code of Ethics annually.

Adviser's employees and persons associated with Adviser are required to follow Adviser's Code of Ethics. Subject to satisfying this policy and applicable laws, officers, directors and employees of Adviser may trade for their own accounts in securities, which are recommended to and/or purchased for Adviser's Clients. The Code of Ethics is designed to assure that the personal securities transactions, and interests of the employees will not interfere with making decisions in the best interest of advisory Clients. Employee trading is continually monitored to reasonably prevent conflicts of interest between Adviser and its Clients.

## **Brokerage Practices**

All Clients that have selected Adviser's automated Advisory Programs via the Adviser mobile application or website will have brokerage accounts introduced to its clearing and Custody firms. Interactive brokers may act as the clearing firm and qualified custodian. Adviser does not accept Clients who direct the use of brokers other than these firms.

Adviser places all trades for its automated Advisory Programs through this firm. Adviser has evaluated this firm and believes it will provide Adviser Clients with a blend of execution services, commission costs and professionalism that fulfills Adviser's best execution requirement for Client transactions. While Adviser has a reasonable belief that this firm can obtain best execution and competitive prices using various trading destinations such as exchanges, dark pools, or other executing brokers, Adviser will not be independently seeking best execution price capability through other broker dealers. Adviser reserves the right to decline acceptance of any Client account that directs the use of a broker dealer other than these firms for automated model portfolio management, if Adviser believes that this would adversely affect Adviser's duty to obtain best execution.

Adviser may use block trades when advantageous to Clients. Block trades permit the trading of aggregate blocks of securities composed of assets from multiple Client accounts so long as transaction costs are shared equally and on a prorated basis between all accounts included in any such block. Block trading allows Adviser to execute trades in a timelier, equitable manner and to reduce overall commission charges to Clients. Adviser does not have any arrangements to compensate any broker dealer for Client referrals. Adviser does not participate in any research or other soft-dollar arrangements.

## **Review of Accounts**

Adviser's automated Advisory Programs use proprietary analysis to review the portfolios to ensure that its model portfolios and asset allocations are in line with the allocation the Client selected. Additional reviews may be triggered by material changes in variables such as a Client's individual circumstances, or the market, political or economic environment.

Clients using the automated Advisory Programs have access to account details continuously through the Adviser website and mobile application, including current account balances and positions. Advisers Custodians prepare account statements showing all transactions and account balances at least quarterly. All information relating to Client accounts are provided on the Adviser website, as agreed to with each Client at the time of their account opening.

Adviser conducts reviews related to the ETFs and stocks used for its automated Advisory Programs. Adviser has the authority, if necessary, to take any corrective action such as the addition, removal, or replacement of any specific individual stocks or ETFs from the portfolios.

## **Client Referrals and Other Compensation**

Adviser uses a Health Savings solution provider to refer some advisory Clients to the firm. Adviser compensates this firm by paying monthly expenses of referred clients.

### **Custody**

Clients receive at least quarterly statements from Interactive brokers who are the qualified custodians to hold and maintain Clients' portfolio assets. Adviser urges Clients to carefully review such statements and compare such official custodial records to the account statements that we may provide.

### **Investment Discretion**

Adviser takes no discretionary authority from the Client in its advisory relationship with the Client to select the identity and amount of any securities to be bought or sold in the Client's account outside of Algo Advisors.

### **Voting Client Securities**

As a matter of firm policy and practice, Adviser does not have any authority to and does not vote proxies on behalf of Clients. Clients retain sole responsibility for receiving and voting proxies for securities maintained in Client portfolios. Clients will receive shareholder notices directly from Custodians. Adviser may provide advice to Clients regarding the Clients' voting of proxies. Adviser will neither advise nor act on behalf of the Client in legal proceedings involving companies whose securities are held or previously were held in the Client's account(s), including, but not limited to, the filing of "Proofs of Claim" in class action settlements. If desired, Clients may direct Adviser to transmit copies of class action notices to the Client or a third party. Upon such direction, Adviser will make commercially reasonable efforts to forward such notices in a timely manner.

### **Financial Information**

Adviser has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to Clients and has not been the subject of a bankruptcy proceeding.