



SNAPPY KRAKEN, LLC

FORM ADV PART 2A

FIRM BROCHURE

Effective: February 1, 2022

This Part 2A of Form ADV (“Brochure”) provides information about the qualifications and business practices of Snappy Kraken, LLC (“Snappy Kraken” or the “Firm”). If you have any questions about the contents of this Brochure, please contact us at (352) 216-5940. 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. Registration does not imply a certain level of skill or training.

Additional information about Snappy Kraken, LLC also is available on the SEC’s website at www.adviserinfo.sec.gov. The site may be searched by a unique identifying number known as a CRD number. Snappy Kraken, LLC’s CRD number is [insert here].

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ITEM 2: MATERIAL CHANGES

This version of Snappy Kraken’s Part 2A of Form ADV (“Brochure”), dated **December 15, 2021**, is Snappy Kraken’s first brochure document. It contains information about our business practices as well as a description of potential conflicts of interest relating to our advisory business. We are providing this material in accordance with Rule 204-3 of the Investment Advisers Act of 1940, which requires registered investment advisers (“RIAs”) to provide a written disclosure statement upon entering into an advisory relationship.

FULL BROCHURE AVAILABLE

We will provide a new version of the Brochure as necessary when updates or new information are added, at any time, without charge. To request a complete copy of our Brochure, please contact Robert Sofia at (352) 216-5940.

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Item 4: Advisory Business

A. ADVISORY BUSINESS

Snappy Kraken, LLC (the “Firm” or “Snappy Kraken”) was formed in June 2016 and is currently operating as a marketing company for financial services in the State of Florida. Snappy Kraken is 100% owned by many shareholders. No single shareholder owns more than 25%. The Firm is managed by Robert Sofia, who is the sole investment adviser representative and Chief Compliance Officer. As a part of their service model, Snappy Kraken will offer advertising services along with solicitor services.

B. ADVISORY SERVICES

Snappy Kraken does not provide advisory services. Instead, Snappy Kraken acts as a solicitor for other RIAs.

C. TAILORING ADVISORY SERVICES

Snappy Kraken refers prospective clients to other RIAs, who offer advisory services that are tailored to the individual needs of the client. For more information, please refer to the Form ADV Part 2A Disclosure Document from your investment advisor’s RIA.

D. WRAP FEE PROGRAMS

Snappy Kraken does not participate in and is not a sponsor of wrap fee programs.

Wrap Fee Programs are arrangements between broker-dealers, investment advisers, banks and other financial institutions, and affiliated and unaffiliated investment advisers through which the clients of such firms receive discretionary investment advisory, execution, clearing and custodial services in a “bundled” form. In exchange for these “bundled” services, the clients pay an all-inclusive (or “wrap”) fee determined as a percentage of the assets held in the wrap account.

E. CLIENT ASSETS UNDER MANAGEMENT

Snappy Kraken does not manage client assets and does not intend to do so in the future.

ITEM 5: FEES AND COMPENSATION

A. FEES

Snappy Kraken acts as a solicitor for outside RIAs. Outside RIAs pay Snappy Kraken a fee for investor leads that Snappy Kraken provides the RIAs. The terms of our agreement with the RIA and the fee payable to Snappy Kraken will be disclosed in the Solicitor Disclosure Document.

B. FEE DEDUCTION

Fees are deducted by the RIA who provides advisory services to the client. Snappy Kraken does not directly charge any fees or have any access to client accounts.

C. OTHER FEES

Clients will not pay any additional fees or expenses to Snappy Kraken.

D. REFUNDS AND TERMINATIONS

Clients do not directly pay Snappy Kraken; thus, clients are not entitled to a refund through the Firm. If a client terminates their relationship with the RIA, the client must notify the RIA in accordance with their advisory agreement.

E. OTHER COMPENSATION

Snappy Kraken also operates as a marketing firm to help other investment adviser firms grow their businesses. Snappy Kraken receives compensation through their monthly marketing subscriptions. This could create a conflict of interest as Snappy receives compensation from other RIAs for marketing and/or solicitation. In the event a conflict of interest, Snappy Kraken will document the conflict in the client's file and notify the client. Clients do not have to choose the RIAs that Snappy Kraken recommends. Clients have the right to decide which RIA they chose to use.

ITEM 6: PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

A. PERFORMANCE BASED COMPENSATION

Neither the Firm nor any of its supervised persons accept performance-based fees. Performance-based fees are fees based on a share of capital gains on, or capital appreciation of the assets of the client.

B. SIDE-BY-SIDE MANAGEMENT

Neither the Firm nor any of its supervised persons participate in side-by-side management. Side-by-side managements refers to the practice of managing accounts that are charged a performance-based fee as well as charged another type of fee, such as a flat fee, hourly fee, or an asset-based fee.

ITEM 7: TYPES OF CLIENTS

Snappy Kraken does not provide investment advice to any clients.

ITEM 8: METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

Snappy Kraken does not utilize any investment strategies, manage any assets, or recommend any securities.

Clients need to be aware that investing in securities involves risk of loss of the principal. Every method of analysis has its own inherent risks. The client should be aware that many different events can affect the value of the client's assets or portfolio including, but not limited to, changes in the financial status of companies, market fluctuations, changes in exchange rates, trading suspensions and delays, economic reports, natural disasters, elections, and global pandemics. All investment programs have certain risks that are borne by the investor. To discuss the specifics regarding risk please refer to your financial advisors Form ADV Part 2A Disclosure Document.

ITEM 9: DISCIPLINARY INFORMATION

Snappy Kraken is required to disclose all material facts regarding any legal or disciplinary events that are material to a client's or prospective client's evaluation of Snappy Kraken or the integrity of the Firm's management. Neither the Firm nor any of its supervised persons has been involved in legal or disciplinary events that are material to a client's or prospective client's evaluation of the Firm or the integrity of its management.

ITEM 10: OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATION

A. FINANCIAL INDUSTRY ACTIVITIES

The Firm is not a registered broker-dealer. The Firm does not have an application pending to register as a broker-dealer and has no other financial industry activities or affiliations.

B. FINANCIAL INDUSTRY AFFILIATIONS

The Firm is not a registered Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor and does not have an application pending to register as such. Furthermore, the Firm's management and supervised persons are not registered as and do not have an application pending to register as an associated person of the foregoing entities.

C. OTHER MATERIAL RELATIONSHIPS

The Firm does not have any material relationships to disclose.

D. OTHER INVESTMENT ADVISORS

We will recommend prospective clients to work with other RIAs with whom we have solicitor arrangements. This creates a conflict of interest because we are paid for such referrals. This conflict of interest and any other potential risks are mitigated because ultimately the decision to engage the

recommended RIA for advisory services rests with the prospective client. The Firm does not receive any fees when a prospective client does not engage the recommended RIA.

ITEM 11: CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

The Firm does not provide investment advisory or management services. Snappy Kraken and its management persons will not have access to client accounts.

ITEM 12: BROKERAGE PRACTICES

The Firm does not maintain any custodial relationships as it does not manage any client accounts.

ITEM 13: REVIEW OF ACCOUNTS

The Firm does not review client accounts as it does not actively manage any client accounts.

ITEM 14: CLIENT REFERRALS AND OTHER COMPENSATION

The Firm and its management persons will receive cash compensation for client referrals, subject to a solicitation agreement with an RIA. We will provide additional information to prospective clients when we refer them to a firm with whom we have a referral arrangement.

ITEM 15: CUSTODY

Custody means holding, directly or indirectly, client funds or securities, or having any authority to obtain possession of them. The Firm does not have custody of client accounts.

ITEM 16: INVESTMENT DISCRETION

The Firm does not have investment discretion on any client accounts.

ITEM 17: VOTING CLIENT SECURITIES

The Firm will not vote as proxies which are solicited for securities held in client accounts. As a “Solicitor-only-RIA”, we do not actively manage accounts. Our only role is to introduce prospects to other Advisory Firms. The client will receive any information about proxy voting from the custodian. Any assistance available from the client’s investment advisor of record, regarding voting as proxies on their behalf or providing guidance on how to vote, is detailed on their respective Form ADV Part 2A Disclosure Document.

ITEM 18: FINANCIAL INFORMATION

A. BALANCE SHEET REQUIREMENT

The Firm is not required to provide a balance sheet as it does not serve as a custodian for client funds or securities and does not require prepayment of fees of more than \$1,200 per client, and six months or more in advance.

B. FINANCIAL CONDITION

The Firm does not have any financial impairment that would preclude the Firm from meeting contractual commitments to clients.

C. BANKRUPTCY PETITION

Neither the Firm nor its management persons have been the subject of a bankruptcy petition at any time during the past ten years.