

**Form ADV Part 2A: Firm Brochure**

**Item 1 – Cover Page**

**The Pickle Pros L.L.C.  
(also doing business as Money Pickle)**

1411 Main Street  
Royal Oak, Michigan 48067  
248-881-4288  
www.moneypickle.com

Date of Disclosure Brochure: March 2023

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This disclosure brochure provides information about the qualifications and business practices of The Pickle Pros L.L.C. (also referred to as we, us and Money Pickle throughout this disclosure brochure). If you have any questions about the contents of this disclosure brochure, please contact Brenton Thurman at 248-881-4288. 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 Money Pickle is also available on the Internet at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can view our firm's information on this website by searching for The Pickle Pros L.L.C. or our firm's CRD number 325575.

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

## **Item 2 – Material Changes**

Money Pickle is a newly registered investment adviser, and this disclosure brochure dated March 2023 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.

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## **Item 4 – Advisory Business**

Money Pickle is an investment adviser registered with the United States Securities and Exchange Commission (“SEC”) and is a limited liability company formed under the laws of the State of Michigan. Money Pickle is owned by Brenton Thurman (75% of Money Pickle), Dean Thurman (17% of Money Pickle) and Colin Hendrickson (8% of Money Pickle), and Brenton Thurman serves as the Managing Member, Chief Executive Officer (CEO), and Chief Compliance Officer (CCO) of Money Pickle.

### **Introduction**

The investment advisory services of Money Pickle are limited to referring you as a prospective investment adviser client to a third-party investment adviser through our interactive website.

### **Description of Advisory Services**

The following is a description of the investment advisory services of Money Pickle. Please understand that a written agreement, which details the exact terms of our referral service, must be executed by you and Money Pickle before we can provide you the services described below.

Money Pickle offers advisory services by allowing you to utilize a software accessed through our website, [www.moneypickle.com](http://www.moneypickle.com), which refers you to a third-party investment adviser offering financial planning, asset management and/or other investment advisory services. To determine your financial situation, investment experience, investment objectives, risk tolerance and investment restrictions, we will need to obtain certain information from you through our interactive website. Based upon the information that you provided, we will schedule an introductory meeting online with you and the referred third-party investment adviser. You are not charged for this initial introductory meeting arranged by Money Pickle.

Our referral services are available only on our website through our automated software and does not involve or include you working directly with our employees. Except for arranging (via our software) your introductory meeting with a referred third-party investment adviser, Money Pickle does not serve as a communication conduit between you and the referred third-party investment adviser.

You are never obligated or required to work with a third-party investment adviser firm that is referred by Money Pickle. If you choose to engage a third-party investment adviser referred by Money Pickle, the third-party investment adviser is responsible for providing you the mutually agreed upon investment advisory services such as financial planning, making investment recommendations or decisions, continuously monitoring client accounts, and/or placing trades in your accounts when necessary. The specific services provided by a third-party investment adviser firm will be determined between you and the third-party investment adviser firm based on what is in your best interests. All services and fees charged by a third-party investment adviser firm will be detailed and outlined in the written agreement you execute with the third-party investment adviser.

As a result of the referral, Money Pickle is paid a fixed fee by the third-party investment adviser regardless of whether you engage the third-party investment adviser. Each referral arrangement between Money Pickle and a third-party investment adviser is performed pursuant to a written referral agreement. Please refer to Item 5 – *Fees and Compensation* for more details.

Money Pickle does not provide advice about investment strategies, types of investments or specific investments, nor does it prepare financial plans, manage client assets or exercise investment discretion. Moreover, our services do not include reviewing the financial plans, investment advice or asset management services provided by the third-party investment adviser. Likewise, we do not monitor or supervise the third-party investment adviser referred to you. No guarantees can be made by us that your financial goals or objectives will be achieved by working with a third-party investment adviser.

Although we review the background of numerous investment adviser firms, we enter into only a select number of relationships with third-party investment adviser firms that have agreed to pay us a fixed fee for referrals. Therefore, Money Pickle has a conflict of interest in that it will only recommend third-party investment advisers that will agree to compensate us for referrals of our clients.

Clients are advised that there may be other third-party investment adviser which do not participate in our referral program that are suitable for a prospective client and that may be less costly than investment advisers referred by Money Pickle. *(Please refer to Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss for more details.)*

If you are unwilling to have your personal and/or financial information provided to the third-party investment advisers in our program, then Money Pickle is unable to assist you with a referral.

#### **Limits Advice to Certain Types of Investments**

Other than referring a third-party investment adviser utilizing its online software, Money Pickle does not provide advice on specific investments, types of investments, asset classes or investment strategies. 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**

Money Pickle's referral to a third-party investment adviser is based upon the individual needs which a prospective client discloses through our website utilizing our online software. We will not refer a prospective client whose investment objectives may be considered incompatible with third-party investment advisers participating in our referral program.

#### **Client Assets Managed by Money Pickle**

The services of Money Pickle do not include managing assets, and consequently, Money Pickle 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 Money Pickle.

### **Referral to Third-Party Investment Advisers**

Money Pickle will not charge or assess an investment advisory fee to you. However, Money Pickle will receive a referral fee from the referred third-party investment adviser firm. The referral fee is typically in the amount \$10,000 for ten initial appointments with referrals of qualified prospective clients from Money Pickle.

The third-party investment adviser referred by Money Pickle will not charge you a fee for the introductory, online meeting arranged by us. If you choose to engage a third-party investment adviser firm, you will speak with that third-party investment adviser to determine the fees they charge to provide advisory services. The actual investment advisory fee charged to you will vary depending on the third-party investment adviser. A complete description of the third-party investment adviser's services, fee schedules and account minimums will be disclosed in the third-party investment adviser's disclosure brochure which will be provided to you prior to or at the time an agreement for services is executed and the account is established. All fees are calculated and collected by the third-party investment adviser or its service providers. Depending upon the third-party investment adviser, a client may incur additional charges including but not limited to, mutual fund sales loads, 12b-1 fees and surrender charges, and IRA and qualified retirement plan fees. We do not receive or share in any portion of such fees and expenses. We are not compensated for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds.

We have a conflict of interest by only offering those third-party investment advisers that have agreed to pay a referral fee to us and have met the conditions of our review. There may be other third-party investment advisers that may be suitable for you that may be less costly.

### **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**

Money Pickle generally provides investment advice to the following types of clients:

- Individuals
- High net worth individuals
- Trusts, estates, or charitable organizations
- Corporations or business entities other than those listed above

You are required to execute a written agreement with Money Pickle to utilize our services.

### **Minimum Investment Amounts Required & Other Conditions**

There are no minimum investment amounts or conditions required for participating in our referral service. However, all prospective clients are required to execute an agreement with us prior to receiving a referral to a third-party investment adviser.

If the prospective client and third-party investment adviser decide mutually to enter into an engagement, the third-party investment adviser will require the prospective client to execute an investment advisory. A third-party investment adviser may have minimum account and fee requirements in order to participate in its advisory service. Each third-party investment adviser will disclose its minimum account size and fees in its disclosure brochures.

When you evaluate our referral services, you should be aware that a referral arrangement with Money Pickle is likely to be different from the “traditional” solicitor or referral relationship in several aspects:

- a) Money Pickle is a software based investment advisor which means you must acknowledge your ability and willingness to conduct her relationship with Money Pickle on an electronic basis. Under the terms of our agreement, you will agree to receive all information from us through your access to our website and electronic communication from us. Unless noted otherwise on our website or within this Brochure, the signature for our referral services agreement is managed electronically. Money Pickle does not make an investment adviser representative of Money Pickle available to discuss a referral with you.
- b) Money Pickle collects information from you including specific information about your investing profile such as financial situation, investment experience, investment objectives, risk tolerance and investment restrictions. Money Pickle maintains this information in strict confidence; however, Money Pickle does share this information with third-party investment advisers during the process of selecting a third-party investment adviser for referral. When making a referral of a third-party investment adviser, Money Pickle relies upon the information received from you.

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

### **Methods of Analysis**

Money Pickle does not provide investment advice and therefore does not utilize any method for analyzing investments.

### **Investment Strategies**

Money Pickle does not provide investment advice nor manage assets, and consequently, Money Pickle does recommend or utilize any investment strategies.

### **Primarily Recommend One Type of Security**

Money Pickle does not recommend individual securities nor any types of securities.

### **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, Money Pickle is unable to represent, guarantee, or even imply that services and methods of analysis used by a referred third-party investment adviser can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to market corrections or declines.

### **Item 9 – Disciplinary Information**

Item 9 asks for disclosure of any legal or disciplinary events that either the firm, or its management persons, have been involved in, in any of the following areas:

1. A criminal or civil action in a domestic, foreign or military court of competent jurisdiction.
  - Money Pickle has nothing to report for this item.
2. An administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority.
  - Money Pickle has nothing to report for this item.
3. A self-regulatory organization (SRO) proceeding.
  - Money Pickle has nothing to report for this item.

### **Item 10 – Other Financial Industry Activities and Affiliations**

Money Pickle 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.

We are an independent investment registered adviser and only provide investment advisory services. We are not engaged in any other business activities and offer no other services except those described in this Disclosure Brochure. However, while we do not sell products or services other than investment advice, our representatives may sell other products or provide services outside of their role as investment adviser representatives with us.

#### **Co-Owner Is Registered Rep & Investment Adviser Rep**

Dean Thurman, an owner of Money Pickle and the father of Money Pickle's majority owner and CEO, also serves in an independent contractor capacity as a registered representative of Cambridge Investment Research, Inc. ("CIR"), a securities broker-dealer, and an investment adviser representative of Cambridge Investment Research Advisors, Inc. ("CIRA"), an investment adviser. Money Pickle does not own or control CIR and CIRA.



To the extent that Dean Thurman will participate in Money Pickle's referral program as a third-party investment adviser through CIRA, Money Pickle has a conflict of interest, lacks objectivity and is biased when reviewing and approving Dean Thurman's initial and ongoing participation in the referral program due to ownership interest in Money Pickle and family relationship with the CEO. As a result, a prospective client referred to Dean Thurman by Money Pickle is under no obligation to utilize his services and should carefully review the qualifications and history of Dean Thurman before entering into an agreement with CIR/CIRA.

### **Third-Party Investment Advisers**

Money Pickle has developed a program, previously described in *Item 5* of this disclosure brochure, designed to allow us to refer prospective clients to third-party investment advisers, which have agreed to pay us a fix fee for setting up a certain number of initial appointments with referrals.

You are never required to hire a third-party investment adviser referred by Money Pickle. Selecting an investment professional is a major decision and should never be made based solely on marketing materials nor should the decision be based solely on our referral service. You are encouraged to conduct your own, independent, due diligence on investment service providers before deciding to retain their services. Our referral service is not a substitute for your own initial and ongoing due diligence of any third-party service provider is referred by us to you.

If you are considering whether to select a third-party investment adviser referred by Money Pickle, please refer to *Items 4 and 5* for full details regarding the programs, fees, conflicts of interest and materials arrangements when Money Pickle refers a third-party investment adviser.

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

### **Code of Ethics Summary**

Money Pickle has established a Code of Ethics that will apply to all of its supervised 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. Money Pickle has a fiduciary duty to all clients. This fiduciary duty is considered the core underlying principle for our Code of Ethics. Money Pickle has the responsibility to make sure that the interests of all clients are placed ahead of Money Pickle's own investment interest. Full disclosure of all material facts and conflicts of interest will be provided to clients prior to any services being conducted. Money Pickle 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 Money Pickle's Code of Ethics. Clients may receive a complete copy of the Code of Ethics upon request.

### **Personal Securities Transactions Disclosure**

As detailed previously in this Disclosure Brochure, Money Pickle does not recommend specific securities to clients nor does the firm buy or sell securities for client accounts. More specifically, Money Pickle does not have access to client accounts, and Money Pickle will not recommend securities owned by Money Pickle or its supervised persons.

## **Item 12 – Brokerage Practices**

The third-party investment advisers that we refer may be dually registered as an investment adviser and broker/dealer or may have an affiliated company that is a broker/dealer. Investment advisory services offered by third-party investment advisers that we refer are provided through the third-party investment adviser in its separate capacity as a registered broker/dealer member FINRA/SIPC, through its affiliated broker/dealer or through an unaffiliated broker/dealer selected or recommended by the third-party investment adviser. Therefore, when Money Pickle refers a third-party investment adviser, this is an indirect referral to the brokerage platforms utilized by the third-party investment adviser.

Money Pickle does not receive soft dollar benefits from any broker/dealers nor do any broker/dealers provide us with client referrals.

As previously stated, you are never obligated to utilize Money Pickle's online referral service nor required to hire a referred third-party investment adviser as your investment adviser or broker/dealer. Selecting an investment professional is an important decision and should never be made based solely on marketing materials nor should the decision be based solely on my recommendation(s). You are encouraged to conduct your own, independent, due diligence on investment adviser firms and brokerage platforms before deciding to retain their services.

## **Item 13 – Review of Accounts**

Our services do not include on-going monitoring, consultations or reviews of client assets. Money Pickle does not provide regular reports to clients.

Whether reports by referred third-party investment adviser are provided to you will depend upon the particular third-party investment adviser. You are strongly encouraged to always compare any reports or statements provided by third-party investment adviser against the account statements delivered from the qualified custodian. When you have questions about your account statement, you should contact both the third-party investment adviser and the qualified custodian preparing the statement.

## **Item 14 – Client Referrals and Other Compensation**

Money Pickle does not directly or indirectly compensate any person for client referrals.

The only compensation received from advisory services is the fees charged for providing investment advisory services as described in *Item 5* of this Disclosure Brochure. Money Pickle receives no other forms of compensation in connection with providing investment advice.

*Please see Item 5, Fees and Compensation, Item 10, Other Financial Industry Activities and Affiliations and Item 12, Brokerage Practices, for additional discussion concerning other compensation.*

## **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. According to this definition, Money Pickle does **not** have custody of client funds or securities.

### **Item 16 – Investment Discretion**

Money Pickle does not have discretion authority to make investment decisions for any of your accounts.

### **Item 17 – Voting Client Securities**

#### **Proxy Voting**

Money Pickle does not vote proxies on your behalf. It is your responsibility to vote all proxies for securities held in your accounts.

With respect to assets managed by a third-party investment adviser, you will need to refer to each third-party investment adviser's disclosure brochure to determine whether the third-party investment adviser will vote proxies on your behalf. You may request a complete copy of third-party investment adviser's proxy voting policies and procedures as well as information on how your proxies were voted by contacting the third-party investment adviser.

### **Item 18 – Financial Information**

This *Item 18* is not applicable to this brochure. Money Pickle 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, Money Pickle has not been the subject of a bankruptcy petition at any time.

### **Privacy Policy Notice**

**Commitment to Your Private Information:** The Pickle Pros L.L.C. (also doing business as Money Pickle) has a policy of protecting the confidentiality and security of information we collect about individuals and/or entities who utilize our referral service. We do not, and will not, share non-public personal information (“Information”) about you with outside third parties without your consent, except for the specific purposes described below. This notice has been provided to you to describe the Information we may gather and the situations under which we may need to share it.

**Why We Collect and How We Use Information.** We limit the collection and use of Information within our firm to only those individuals associated or employed with us that must have Information to provide financial services to you. Such services are limited to referring you to other third-party investment advisers who have agreed in writing to participate in our referral program.

**How We Gather Information.** We get our Information directly from you when you provide us with information via our interactive online website, <https://www.moneypickle.com>. The Information you typically provide us through our website consists of your name, contact information, age, marital status, number of dependents, occupation, employer, education, investment experience, annual income, net worth, liquid net worth, description of existing assets, investment objectives and risk tolerance.

**How We Protect Information.** Our employees and affiliated persons are required to protect the confidentiality of Information and to comply with our stated policies. They will access Information only when there is an acceptable

reason to do so. Employees who violate our Privacy Policy are subject to disciplinary action, up to and including termination from employment with us. We also maintain physical, electronic and procedural safeguards to protect Information, which comply with applicable state and federal laws and rules thereunder.

**Sharing Information with Other Companies Permitted or Required Under Law.** We do not disclose Information obtained in the course of our practice except as required or permitted under law solely to service clients and to conduct customary business operations. Permitted disclosures include, for instance, providing Information to other third-party investment advisers who participate in our third-party investment adviser referral program. If you are unwilling to have your personal and/or financial information provided to the third-party investment advisers in our program, then Money Pickle is unable to assist you with a referral. Only when necessary, we may provide Information to our third-party service providers that assist us with business, operational and compliance support. In such situations, we stress the confidential nature of Information being shared. When requested, we provide 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.

**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 non-public information with strict confidentiality.

**Future Changes.** Any time a change is made to our Privacy Policy, this Privacy Policy Notice will be revised. The revised statement will be given to all affected clients prior to any disclosure of information. In addition, we provide a copy of this notice to all current and existing clients whenever there is a change to our privacy policy.

### **Business Continuity Plan**

Money Pickle has a business continuity and contingency plan in place designed to respond to significant business disruptions. These disruptions can be both internal and external. Internal disruptions will impact our ability to communicate and do business, such as a fire in the office building. External disruptions will prevent the operation of the securities markets or the operations of a number of firms, such as earthquakes, wildfires, hurricanes, terrorist attack or other wide-scale, regional disruptions.

Our continuity and contingency plan has been developed to safeguard employees' lives and firm property, to allow a method of making financial and operational assessments, to quickly recover and resume business operations, to protect books and records, and to allow clients to continue transacting business.

The plan includes the following:

- Alternate locations to conduct business;
- Hard and electronic back-ups of records;
- Alternative means of communications with employees, clients, critical business constituents and regulators; and
- Details on the firms' employee succession plan

Our business continuity and contingency plan is reviewed and updated on a regular basis to ensure that the policies in place are sufficient and operational.