

Item 1 – Cover Page

Part 2A of Form ADV



981 Highway 98E  
Suite 3289  
Destin, FL 32541  
Phone: 501-213-6070  
Email: [agemechu@entoroinvestments.com](mailto:agemechu@entoroinvestments.com)

August 15, 2023

This Brochure provides information about the qualifications and business practices of Martin Capital Advisors, LLC. If you have any questions about the contents of this Brochure, please contact us using the information listed above. 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.

Martin Capital Advisors, LLC (CRD# 327637) is a registered investment advisor with the SEC. Registration of an investment advisor does not imply any certain level of skill or training.

Additional information about Martin Capital Advisors, LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 – Material Changes

Since this is the initial filing of this brochure, there are no material changes to report.

### Item 3 – Table of Contents

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

## Item 4 – Advisory Business

### A. Description of the Advisory Firm

Martin Capital Advisors, LLC (“MCA”), was formed on November 3, 2022 is based in Destin, FL. MCA has been providing investment advisory services since 2023 as an SEC Registered Advisor. MCA’s principal owner is Rod Martin.

### B. Types of Advisory Services

#### ASSET MANAGEMENT

MCA offers asset management services to advisory Clients. MCA will offer Clients ongoing asset management services through determining individual investment goals, time horizons, objectives, and risk tolerance. Investment strategies, investment selection, asset allocation, portfolio monitoring and the overall investment program will be based on the above factors.

#### Discretionary

When the Client elects to use MCA on a discretionary basis, the Client will sign a limited trading authorization or equivalent allowing MCA to determine the securities to be bought or sold and the amount of the securities to be bought or sold. MCA will have the authority to execute transactions in the account without seeking Client approval on each transaction.

MCA may also recommend that certain qualified Clients consider an investment in private funds/offerings. MCA’s role relative to the private investment funds can include, but not limited to, initial and ongoing due diligence, fund management, and investment monitoring services. MCA’s Clients are under no obligation to consider or make an investment in a private investment fund(s).

Each prospective private fund investor will be required to complete a Subscription Agreement or similar application, pursuant to which the Client shall establish that he/she is qualified for investment in the fund and acknowledges and accepts the various risk factors that are associated with such an investment. Please see Item 8 for more information on the risks associated with this type of investment.

### C. Client-Tailored Services and Client-Imposed Restrictions

The goals and objectives for each Client are documented in our Client files. Investment strategies are created that reflect the stated goals and objectives. Clients may impose restrictions on investing in certain securities or types of securities. These restrictions may, however, prohibit engagement with MCA.

### D. Wrap Fee Programs

MCA does not participate in a Wrap Program.

### E. Amounts Under Management

As of December 31, 2020, MCA provides management services for:

Discretionary Assets:	Non-Discretionary Assets:
\$0	\$0

## Item 5 – Fees and Compensation

### A. Fee Schedule

#### ASSET MANAGEMENT

MCA offers asset management services to advisory Clients. MCA charges an annual investment advisory fee based on the total assets under management as follows:

Assets Under Management	Annual Fee
\$0 - \$500,000	1.25%
\$500,001 - \$2,000,000	1.00%
\$2,000,001 - \$5,000,000	0.75%
Over \$5,000,000	0.50%

This is a tiered or breakpoint fee schedule, meaning the entire account is charged the same management fee at the applicable breakpoint. Fees are billed monthly in arrears based on the amount of assets managed as of the close of business on the last business day of the previous billing period. Lastly, please note that MCA may group certain related Client accounts, often known as “householding”, for the purposes of achieving the minimum account size and determining the annualized fee.

### B. Payment of Fees

Asset Management Fees are deducted directly from the Client’s Account.

MCA, in its sole discretion, may charge a lesser investment advisory fee based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with Clients, etc.).

For all services, Clients may terminate their engagement with MCA within five (5) business days of signing an Agreement with no obligation and without penalty. After the initial (5) business days, the Agreement may be terminated by MCA with thirty (30) days written notice to Client and by the Client at any time with written notice to MCA. For accounts opened or closed mid-billing period, fees will be prorated based on the days services are provided during the given period. All unpaid earned fees will be due to MCA and all unearned fees will be refunded to the Client. Any increase in fees will be acknowledged in writing by both parties before any increase in said fees occurs.

### C. Additional Fees

Custodians may charge brokerage commissions, transaction fees, and other related costs on the purchases or sales of mutual funds, equities, bonds, options, margin interest, and exchange-traded funds. Mutual funds, money market funds, and exchange-traded funds may also charge internal management fees, which are disclosed in the fund’s prospectus. MCA does not directly receive any compensation from these fees. All of these fees are in addition to the management fee you pay to MCA. For more details on the brokerage practices, see Item 12 of this brochure.

D. Prepayment of Fees

MCA does not expect Clients to prepay fees.

E. External Compensation for the Sale of Securities

MCA does not receive any external compensation from the sale of securities.

MCA and/or its Investment Advisor Representatives may receive external compensation from affiliations as the general partner of private funds/offerings or other pooled investment vehicles. MCA may recommend these funds as investments for certain qualifying clients. This represents a conflict of interest because it gives an incentive to recommend investment in these funds as the general partners will receive additional fees. This conflict is mitigated by disclosures, procedures and MCA's fiduciary obligation to place the best interest of the Client first. Moreover, Client are under no obligation to invest in such partnerships.

### **Item 6 - Performance-Based Fees and Side-By-Side Management**

As the general partner to affiliated private funds/offerings, MCA may receive performance-based compensation from the funds. Such performance-based compensation is generally calculated based on a share of all net realized income and gains and losses of the funds.

Investors and prospective investors in any of the funds should note that performance-based compensation, in some contexts, can create an incentive for MCA to recommend investments which may be riskier or more speculative than those which would be recommended under a different fee arrangement.

Side-by-side management refers to multiple client relationships where an adviser manages more than one client relationship or portfolio on a simultaneous basis. Various conflicts of interest arise by such side-by-side management. For example, in theory, MCA could have incentive to favor a fund paying performance-based compensation over one that does not pay performance-based compensation. Or a fund paying higher aggregate performance-based compensation over one paying less. This conflict is mitigated by disclosures, procedures and MCA's fiduciary obligation to place the best interest of the Client first.

### **Item 7 – Types of Clients & Account Minimums**

MCA's Clients are generally individuals, high net-worth individuals, charities, small businesses, and pooled investment vehicles. Client relationships vary in scope and length of service.

There is no minimum account size and Clients are not required to have a certain amount of investment experience or sophistication.

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

### A. Methods of Analysis and Investment Strategies

Investing in securities involves risk of loss that Clients should be prepared to bear. Past performance is not a guarantee of future returns. Security analysis methods may include:

Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

Technical analysis attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not take into account new patterns that emerge over time.

In developing a financial plan for a Client, MCA's analysis may include cash flow analysis, investment planning, risk management, tax planning and estate planning. Based on the information gathered, a detailed strategy is tailored to the Client's specific situation.

The main sources of information include financial newspapers and magazines, annual reports, prospectuses, and filings with the SEC.

### B. Investment Strategy

The investment strategy for a specific Client is based upon the objectives stated by the Client during consultations. The Client may change these objectives at any time by providing written notice to MCA. Each Client executes a Client profile form or similar form that documents their objectives and their desired investment strategy.

### C. Risks of Investments and Strategies Utilized

Investing in securities involves risk of loss that Clients should be prepared to bear. MCA's investment approach constantly keeps the risk of loss in mind. Investors may face the following investment risks:

**General Investment and Trading Risks.** Clients may invest in securities and other financial instruments using strategies and investment techniques with significant risk characteristics. The investment program utilizes such investment techniques as option transactions, margin transactions, short sales, leverage, and derivatives trading, the use of which can, in certain circumstances, maximize the adverse impact to which a Client may be subject.

**Interest-rate Risk.** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.

**Inflation Risk.** When any type of inflation is present, a dollar today will buy more than a dollar next year, because purchasing power is eroding at the rate of inflation.

**Currency Risk.** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.

**Reinvestment Risk.** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.

**Liquidity Risk.** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.

**Management Risk.** The advisor's investment approach may fail to produce the intended results. If the advisor's assumptions regarding the performance of a specific asset class or fund are not realized in the expected time frame, the overall performance of the Client's portfolio may suffer.

**Cybersecurity Risk.** MCA and its service providers may be subject to operational and information security risks resulting from cyberattacks. Cyberattacks include, among other behaviors, stealing or corrupting data maintained online or digitally, denial of service attacks on websites, the unauthorized release of confidential information or various other forms of cybersecurity breaches. Cybersecurity attacks affecting MCA and its service providers may adversely impact Clients. For instance, cyberattacks may interfere with the processing of transactions, cause the release of private information about Clients, impede trading, subject MCA to regulatory fines or financial losses, and cause reputational damage. Similar types of cybersecurity risks are also present for issuers of securities in which Clients may invest in, qualified custodians, governmental and other regulatory authorities, exchange and other financial market operators, or other financial institutions. Cybersecurity incidents that could ultimately cause them to incur losses, including for example: financial losses, cost and reputational damages, and loss from damage or interruption of systems. Although MCA has established its systems to reduce the risk of these incidents from coming to fruition, there is no guarantee that these efforts will always be successful, especially considering that MCA does not directly control the cybersecurity measures and policies employed by third party service providers.

The foregoing list of risk factors does not purport to be a complete enumeration or explanation of the risks involved in an investment with MCA.

## Item 9 – Disciplinary Information

MCA and its management have not been involved in any criminal or civil actions, administrative or self-regulatory enforcement proceedings, nor any legal or disciplinary events that are material to a Client's or prospective Client's evaluation of MCA or the integrity of its management.

## Item 10 – Other Financial Industry Activities and Affiliations

### A. Registration as a Broker-Dealer or Broker-Dealer Representative

Neither MCA nor its management persons are registered as a broker-dealer or broker-dealer representative.



B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

Neither MCA nor its management persons are registered as futures commission merchant, commodity pool operator, or a commodity trading advisor.

C. Relationships Material to this Advisory Business and Possible Conflicts of Interest

Investment Advisor Representatives of MCA receive external compensation from sales of investment related services as Insurance Agents. This represents a conflict of interest because it gives an incentive to recommend services based on the fee amount received. This conflict is mitigated by disclosures, procedures and MCA's fiduciary obligation to place the best interest of the Client first. Moreover, Clients are not required to engage the Agent or Agency if they do not wish to. More information on this can be found in the respective Investment Advisor Representative's Form U4 and ADV 2B.

MCA and/or its Investment Advisor Representatives may receive external compensation from affiliations as the general partner of private funds/offerings or other pooled investment vehicles. MCA may recommend these funds as investments for certain qualifying clients. This represents a conflict of interest because it gives an incentive to recommend investment in these funds as the general partners will receive additional fees. This conflict is mitigated by disclosures, procedures and MCA's fiduciary obligation to place the best interest of the Client first. Moreover, Client are under no obligation to invest in such partnerships.

D. Selection of Other Advisors or Managers

MCA does not utilize nor select other advisors.

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

A. Code of Ethics

The affiliated persons (affiliated persons include employees and/or independent contractors) of MCA have committed to a Code of Ethics ("Code"). The purpose of our Code is to set forth standards of conduct expected of MCA affiliated persons and addresses conflicts that may arise. The Code defines acceptable behavior for affiliated persons of MCA. The Code reflects MCA and its supervised persons' responsibility to act in the best interest of their Client.

One area which the Code addresses is when affiliated persons buy or sell securities for their personal accounts and how to mitigate any conflict of interest with our Clients. We do not allow any affiliated persons to use non-public material information for their personal profit or to use internal research for their personal benefit in conflict with the benefit to our Clients.

MCA's policy prohibits any person from acting upon or otherwise misusing non-public or inside information. No advisory representative or other affiliated person, officer or director of MCA may recommend any transaction in a security or its derivative to advisory Clients or engage in personal securities transactions for a security or its derivatives if the advisory representative possesses material, non-public information regarding the security.

MCA's Code is based on the guiding principle that the interests of the Client are our top priority. MCA's officers, directors, advisors, and other affiliated persons have a fiduciary duty to our Clients

and must diligently perform that duty to maintain the complete trust and confidence of our Clients. When a conflict arises, it is our obligation to put the Client's interests over the interests of either affiliated persons or the company.

The Code applies to "access" persons. "Access" persons are affiliated persons who have access to non-public information regarding any Clients' purchase or sale of securities, or non-public information regarding the portfolio holdings of any reportable fund, who are involved in making securities recommendations to Clients, or who have access to such recommendations that are non-public.

MCA will provide a copy of the Code of Ethics to any Client or prospective Client upon request.

**B. Recommendations Involving Material Financial Interests**

MCA anticipates, in appropriate circumstances and consistent with Clients investment objectives, MCA may recommend the purchase of partnership interests in which our affiliates, directly or indirectly, have a material financial interest. MCA's employees, directors, and partners often invest in these same partnerships. Because of the nature of these partnerships, investment by employees, partners, and directors do not influence pricing. Should a conflict arise, it will be mitigated by disclosures, procedures and MCA's fiduciary obligation to place the best interest of the Client first. Moreover, Client are under no obligation to invest in such partnerships.

**C. Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest**

MCA and its affiliated persons may invest in the same securities (or related securities, e.g., warrants, options or futures) that MCA or an affiliated person recommends to Clients. In order to mitigate conflicts of interest, such as frontrunning, MCA's Chief Compliance Officer, or their designee, will no less than quarterly, review firm and/or personal holdings of its affiliated persons. These reviews ensure that the personal trading of affiliated persons does not disadvantage Clients of MCA.

**D. Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest**

MCA and its affiliated persons may recommend securities, or buy or sell securities for Clients accounts, at or about the same time, that they also buy or sell the same securities in their own account(s). MCA, for instance, will place trades in an account in an attempt to earn better than money market rates. In order to mitigate conflicts of interest, such as frontrunning, MCA's Chief Compliance Officer, or their designee, will no less than quarterly, review firm and/or personal holdings of its affiliated persons. These reviews ensure that the personal trading of affiliated persons does not disadvantage Clients of MCA.

## **Item 12 – Brokerage Practices**

**A. Factors Used to Select or Recommending Broker-Dealers**

MCA may recommend the use of a specific broker-dealer or may utilize a broker-dealer of the Client's choosing. MCA will select appropriate brokers based on a number of factors including but not limited to their transaction fees, quality of customer service, and reporting ability. MCA relies on the broker-dealer to provide its execution services at the best prices available. Lower fees for comparable services may be available from other sources. Clients pay for any and all custodial fees

in addition to the advisory fee charged by MCA. Please note that not all Investment Advisors require that their clients direct brokerage.

1. Research and Other Soft Dollar Benefits  
MCA does not receive soft dollar benefits.
2. Brokerage for Client Referrals  
MCA does not receive Client referrals from any custodian or third party in exchange for using that broker-dealer or third party.
3. Directed Brokerage  
MCA does not generally accept directed brokerage arrangements (when a Client requires that account transactions be effected through a specific broker-dealer). However, MCA does allow for Client directed brokerage in certain situations. Such situations may affect MCA's ability to negotiate commissions with the resulting inability to obtain volume discounts or best execution for Client directed accounts in some transactions. Therefore, a Client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case should the Client elect to trade through the broker-dealer MCA recommends.

Investment advisors who manage or supervise Client portfolios have a fiduciary obligation of best execution. The determination of what may constitute best execution and price in the execution of a securities transaction by a broker involves a number of considerations and is subjective. Factors affecting brokerage selection include the overall direct net economic result to the portfolios, the efficiency with which the transaction is affected, the ability to affect the transaction where a large block is involved, the operational facilities of the broker-dealer, the value of an ongoing relationship with such broker and the financial strength and stability of the broker. The firm does not receive any portion of the trading fees.

B. Aggregating Trading for Multiple Client Accounts

When a Client authorizes discretionary management, MCA is authorized in its discretion to aggregate purchases and sales and other transactions made for the account with purchases and sales and transactions in the same securities for other Clients of MCA. All Clients participating in the aggregated order shall receive an average share price with all other transactions. If aggregation is not allowed or infeasible and individual transactions occur (e.g., withdrawal or liquidation requests, odd-late trades, etc.) an account may potentially be assessed higher costs or less favorable prices than those where aggregation has occurred. MCA will always attempt to aggregate orders whenever it has the opportunity to do so.

### Item 13 – Review of Accounts

A. Frequency and Nature of Periodic Review and Who Makes Those Reviews

Account reviews are performed at least annually by the Chief Compliance Officer of MCA. Account reviews are performed more frequently when market conditions dictate. Reviews of Client accounts include, but are not limited to, a review of Client documented risk tolerance, adherence to account objectives, investment time horizon, and suitability criteria, reviewing target allocations of each

asset class to identify if there is an opportunity for rebalancing, and reviewing accounts for tax loss harvesting opportunities.

B. Factors That Will Trigger a Non-Periodic Review of Client Accounts

Other conditions that may trigger a review of Clients' accounts are changes in the tax laws, new investment information, and changes in a Client's own situation.

C. Content and Frequency of Regular Reports

Clients receive written account statements no less than quarterly for managed accounts. Account statements are issued by the Client's custodian. Client receives confirmations of each transaction in account from Custodian and an additional statement during any month in which a transaction occurs. MCA may also send periodic or other event-inspired reports based on market or portfolio activity. Reports will generally be provided in electronic format.

### Item 14 – Client Referrals and Other Compensation

A. Economic Benefits from Others

MCA does not receive any economic benefits from external sources.

B. Compensation to Non-Advisory Personnel for Client Referrals

MCA does not compensate for Client referrals.

### Item 15 – Custody

All assets are held at qualified custodians, which means the custodians provide account statements directly to Clients at least quarterly. Clients are urged to compare the account statements received directly from their custodians to any documentation or reports prepared by MCA.

MCA is deemed to have limited custody solely because advisory fees are directly deducted from Client's accounts by the custodian on behalf of MCA. MCA will obtain written authorization from Client to allow for such deductions.

MCA also has custody over assets invested in MCA's affiliated private funds/offerings (see Item 10 above). The private offerings are audited annually by a Public Company Accounting Oversight Board ("PCAOB") registered and inspected accounting firm. The audit reports are distributed to investors of these offerings upon completion.

MCA is not affiliated with the custodian. The custodian does not supervise MCA, its employees or activities.

### Item 16 – Investment Discretion

If applicable, Client will authorize MCA discretionary authority, via the Advisory Agreement, to determine, without obtaining specific Client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. If applicable, Client will authorize MCA discretionary authority to execute selected investment program transactions as stated within the Investment

Advisory Agreement. If however, consent for discretion is not given, MCA will obtain prior Client approval before executing each transaction.

MCA allows Clients to place certain restrictions, as outlined in the Client's Investment Policy Statement or similar document. Such restrictions could include only allowing purchases of socially conscious investments. These restrictions must be provided to MCA in writing.

The Client approves the custodian to be used and the commission rates paid to the custodian. MCA does not receive any portion of the transaction fees or commissions paid by the Client to the custodian.

### Item 17 – Voting Client Securities

When assistance on voting proxies is requested, MCA will provide recommendations to the Client. However, MCA will not have authority to vote proxies on behalf of the Client. If in the future MCA obtains authority to vote proxies, this Brochure will be appropriately amended. Clients may contact MCA at 501-213-6070 or [agemechu@entoroinvestments.com](mailto:agemechu@entoroinvestments.com).

### Item 18 – Financial Information

#### A. Balance Sheet

MCA does not require nor solicit prepayment of more than \$1,200 in fees per Client, six months or more in advance.

#### B. Financial Condition

At this time, neither MCA nor its management persons have any financial conditions that are likely to reasonably impair its ability to meet contractual commitments to Clients.

#### C. Bankruptcy Petitions in Previous Years

MCA has not been the subject of a bankruptcy petition in the last ten years.

SUPERVISED PERSON BROCHURE  
Part 2B of Form ADV



Jason Rapert

P.O. Box 10388  
Conway, AR 72034  
Mobile: 501-472-2794  
Office: 501-336-0918  
Email: [jason@providencefinancialgroup.net](mailto:jason@providencefinancialgroup.net)

August 15, 2023

This brochure supplement provides information about Jason Rapert and supplements the Martin Capital Advisors, LLC brochure. You should have received a copy of that brochure. Please contact Jason Rapport if you did not receive the brochure or if you have any questions about the contents of this supplement.

Additional information about Jason Rapert (CRD# 3097983) is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Supervised Person Brochure – Jason Rapert

Year of birth: 1972

### Item 2 - Educational Background and Business Experience

Educational Background:

- University of Central Arkansas, BA; 1994

Business Experience:

- Martin Capital Advisors, LLC; Investment Advisor Representative; 07/2023 – Present
- Providence Insurance Agency; Insurance Agent; 01/2020 - Present
- Arkansas State Senator; 01/2011 – 01/2023
- Sowell Management; Investment Advisor Representative; 05/2020 – 09/2021
- Investment Advisors; Investment Advisor Representative; 07/2018 – 12/2018
- Proequities; Registered Representative; 07/2018 -12/2018
- Investment Advisors; Investment Advisor Representative; 03/2010 – 08/2016
- Proequities; Registered Representative; 03/2010 – 08/2016

### Item 3 - Disciplinary Information

*Criminal or Civil Action:* None to report

*Administrative Proceeding:* None to report

*Self-Regulatory Proceeding:* None to report

### Item 4 - Other Business Activities Engaged In

Jason Rapert has outside business activities as follows:

- Licensed Insurance Agent

Approximately 20% of their time is spent on the above practices and from time to time, may offer Clients services from these activities.

These practices represent conflicts of interest because they give Jason Rapert an incentive to recommend products and or services based on the commission or fee amount received. This conflict is mitigated by disclosures, procedures, and MCA's fiduciary obligation to place the best interest of the Client first. Moreover, Clients are not required to purchase or engage Jason Rapert for any products or services offered as Clients have the option to purchase them through another person or entity of their choosing.

### Item 5 - Additional Compensation

Jason Rapert receives commissions on insurance sales but does not receive any performance-based fees. He does not receive any additional compensation for performing advisory services other than what is disclosed in Item 5 of Part 2A.

### Item 6 - Supervision

The Chief Compliance Officer of MCA supervises and monitors the advisory services of Jason Rapert. The Chief Compliance Officer, Guillermo Aragon can be reached at 415-685-3488 or [guillermo@martinorganization.com](mailto:guillermo@martinorganization.com).