

FinTron Advisors LLC

Firm Brochure - Form ADV Part 2A

This brochure provides information about the qualifications and business practices of FinTron Advisors LLC. If you have any questions about the contents of this brochure, please contact us at (203) 557-4458 or by email at: support@fintroninvest.com. 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.

Additional information about FinTron Advisors LLC is also available on the SEC's website at www.adviserinfo.sec.gov. FinTron Advisors LLC's CRD number is: 324052.

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

Version Date: 10/03/2023

Item 2: Material Changes

FinTron Advisors LLC has not yet filed an annual updating amendment using the Form ADV Part 2A. Therefore, there are no material changes to report.

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Item 4: Advisory Business

A. Description of the Advisory Firm

FinTron Advisors LLC (hereinafter “FinTron”, “we”, “our”, or “us”) is a Limited Liability Company organized in the State of Delaware formed in August 2022. FinTron is an SEC-registered investment adviser that maintains its principal office at 201 Broad Street, Floor 6, Suite 604, Stamford, CT 06901. FinTron is a wholly owned subsidiary of FinTron Inc., which is also the parent company of FinTron Invest LLC, an SEC-registered broker dealer, and FinTron Technologies LLC.

B. Types of Advisory Services

Digital Portfolio Management Services

FinTron provides asset allocation and portfolio management services through a shared mobile application (the “App”) created and maintained by FinTron’s parent company, FinTron Inc. FinTron’s investment advisory personnel oversee the algorithm and regularly monitor market activity and every underlying investment to ensure the portfolio is rebalanced appropriately by a sophisticated algorithm but may not monitor each client’s account.

FinTron’s services combine portfolio construction expertise with an individualized portfolio “glidepath” based on the unique goals input by our clients within the application. Allocation glidepaths are further adapted to client changes and market events with probability of success as the primary driver for each asset allocation. In this way, accounts are routinely adjusted to maintain the likelihood of achieving our client’s stated goal.

To generate this advice, a client must provide specific information about themselves, their investment goals, and their funding intentions. This information allows the algorithm to generate a personalized investment plan that is aligned with the client’s stated goal.

The platform will provide custom advice and recommend a portfolio consisting of index-tracking Exchange Traded Funds (“ETFs”), that is created and maintained by FinTron Advisors. These personalized allocation recommendations are presented to the client for approval at their discretion.

Should the client approve the allocation proposed by the algorithm, and thereby opt to execute the recommended transactions through the App, the transactions are routed to FinTron’s affiliated introducing broker dealer, FinTron Invest LLC, and then on to the executing, clearing, and custodian broker, Apex Clearing Corporation. As such, each client of FinTron must also establish an account with our affiliated introducing broker dealer, FinTron Invest. The fees and expenses of the introducing and clearing broker

dealers are not included in the fee for these recommendations as discussed in Item 5 E, below.

While FinTron does not have access to the algorithms running within the software, FinTron has done extensive due diligence on the allocation methodology and outputs of the software and has concluded that they can be of benefit to our clients. Additional details about these allocation recommendations are provided in the disclosure materials of the software provider, which are provided to you as each goal is initiated.

This Brochure is meant to help you understand the nature of the advisory services offered by FinTron, whether the advisory services offered by FinTron are right for you, and the potential conflicts of interest associated with FinTron services. You should review it carefully.

Services Limited to Specific Types of Investments

Client accounts are managed by FinTron pursuant to each client's Advisory Agreement. FinTron provides investment advice and ongoing asset management services for clients through the custom portfolios we create. These portfolios are constructed and maintained by FinTron and typically consist of low-cost, liquid, index-tracking ETFs, as further described in Item 8 below.

FinTron's ability to offer investment recommendations and ongoing allocation decisions is reliant on third party services, FinTron has made and maintains a "Business Continuity Plan" addressing these and other potential service interruptions. Should any essential third-party services be discontinued, notice will be provided to those clients impacted, and a suitable replacement will be engaged.

Written Acknowledgement of Fiduciary Status

When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. We also have a fiduciary duty under the Investment Advisers Act of 1940 with respect to all client accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. Under this special rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and

- Give you basic information about conflicts of interest.

C. Client Tailored Services and Client Imposed Restrictions

FinTron offers the same services to all clients. Each personalized investment recommendation and, if approved by the client, their implementation, are dependent upon the client's responses to a questionnaire. Therefore, it is crucial for clients to furnish FinTron with complete and accurate information. Failure to provide information, or delay in updating this information should it change, can significantly affect the quality of the investment advisory services provided.

The goal specific questionnaire is limited and does not capture all information about a client's personal and financial situation that could be relevant to an investment recommendation. Moreover, not all of the information collected may be factored into each recommendation due to limitations of the software. Clients should keep these limitations in mind before opening an advisory account.

The allocation recommended for each goal is based solely on the requested information, provided via the questionnaire, specific to the client defined goal. This goal specific information is not reviewed for suitability or consistency with any other profile information or additional goals that may have been provided by the client. The client is free to select whatever priority, timeframe, and risk level they deem acceptable for their selected goal.

These services do not aim to provide a comprehensive financial plan. Before investing, clients should prioritize paying off debt, especially high-interest debt such as credit card or unsubsidized student loans; this may help investors avoid late payment penalties, extra interest, and higher finance charges. Additionally, investors should explore options available through workplace savings plans offered by employers that include match programs. If more comprehensive advice is required, FinTron's services may not be appropriate.

Clients may impose restrictions on investing in certain securities in accordance with their preferences, values, or beliefs by replacing any of the securities recommended with one of the substitutions available for each security in the client's custom portfolio.

D. Wrap Fee Programs

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees and transaction costs. FinTron does not participate in wrap fee programs.

E. Assets Under Management

FinTron has the following assets under management:

| Discretionary Amounts: | Non-discretionary Amounts: | Date Calculated: |
|------------------------|----------------------------|------------------|
| \$0 | \$0 | November 2022 |

Item 5: Fees and Compensation

A. Fee Schedule

Portfolio Management Services Fees

FinTron provides portfolio management services via an online interface/mobile App.

| Total Assets Under Management | Annual Fees |
|-------------------------------|-------------|
| All Assets | 0.50% |

To determine the fee-eligible amount, FinTron calculates an average daily balance (“ADB”) for each billing cycle on a monthly basis. To calculate the average daily balance, we add up the ending balance for each day in the billing cycle and divide the total by the number of days in the cycle.

Example:

Suppose a client has a balance of \$50,000 in their advisory account at the beginning of the month, and the billing cycle is one month. To calculate the average daily balance, we would add up the ending balance for each day in the month, which results in a total of \$1,500,000. Then, we would divide the total by the number of days in the month, which is 30, resulting in an average daily balance of \$50,000. The fee for the month would be one twelfth of the 0.5% annual fee (0.042%) times the ADB of \$50,000, which is \$21.

The final fee schedule is memorialized in the client’s Advisory Agreement. Clients may terminate the agreement without penalty for a full refund of FinTron’s fees within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the Investment Advisory Contract immediately by closing the account within the App.

B. Payment of Fees

Payment of Digital Portfolio Management Fees

At the end of each billing cycle, FinTron will deduct the monthly fee from the cash balance in your account. If there is not enough cash available in your account, FinTron will direct its introducing broker dealer to sell securities to generate sufficient cash proceeds to cover the fee. The securities that will be sold are those that deviate the most from the established allocation, with the aim of rebalancing the account.

C. Client Responsibility For Third Party Fees

Clients are responsible for the payment of all third-party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by FinTron. Please see Item 12 of this brochure regarding broker-dealer/custodian.

D. Prepayment of Fees

FinTron collects its fees in arrears. It does not collect fees in advance.

E. Outside Compensation For the Sale of Securities to Clients

Registered Representatives of FinTron's introducing broker-dealer, FinTron Invest LLC, would be entitled to accept compensation for the sale of investment products to FinTron clients. However, FinTron Invest does not offer any securities aside from the listed equities available through the App. In addition, the introducing broker-dealer will receive compensation based on the activities of FinTron as described below.

1. This is a Conflict of Interest

The broker dealers that facilitate FinTron's advisory transactions and maintain custody of client accounts, including our affiliated broker dealer, FinTron Invest LLC, may receive compensation related to these transactions, including asset-based sales charges or service fees from FinTron's clients. This presents a conflict of interest and gives FinTron an incentive to recommend products based on the compensation received rather than on the client's needs. When recommending a transaction, for which the broker dealer receives compensation, FinTron will document the conflict of interest and inform the client.

2. Clients Have the Option to Purchase Recommended Products From Other Brokers

Clients always have the option to purchase recommended investments through other brokers or agents that are not affiliated with FinTron.

3. Commissions are not FinTron's primary source of compensation for advisory services

Commissions are not FinTron's primary source of compensation for advisory services.

4. Advisory Fees in Addition to Commissions or Markups

The advisory fees charged to clients are not reduced to offset the commissions, account fees, or transaction costs imposed by the introducing broker dealer or clearing, execution, and custody broker dealer related advisory transactions and accounts.

Item 6: Performance-Based Fees and Side-By-Side Management

FinTron does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

Item 7: Types of Clients

FinTron generally provides advisory services to the following types of clients:

- ❖ Individuals
- ❖ High-Net-Worth Individuals

There is currently a \$500 minimum deposit for each new goal.

Item 8: Methods of Analysis, Investment Strategies, & Risk of Loss

A. Methods of Analysis and Investment Strategies

Methods of Analysis

The portfolios we build and maintain are carefully designed to meet the needs of a wide variety of potential goals. The allocation recommendations, assigning each goal to a specific portfolio, are furnished by FinTron but are generated through the use of third-

party software. This software uses Dynamic Programming to determine the initial asset allocation and suggests ongoing changes to it. Dynamic Programming is a multi-period optimization method that works backwards in time from a predefined endpoint to arrive at the optimal portfolio allocation the investor should be on today.

Investment Strategies

Fintron uses a goal-based approach to investing. The framework is based on a foundation of developments in behavioral economics and finance and is consistent with modern portfolio theory. It produces a portfolio that will move about on the Efficient Frontier, dynamically addressing changes to the market in order to optimize the investor's goals. The trajectory of this evolution will depend on the investor's preferences, which can be pre-selected both in the case when the portfolio is sufficiently funded and when it becomes underfunded if the financial situation worsens sufficiently.

Clients are encouraged to create their custom goals by answering a series of questions including, but not limited to, client's Risk Tolerance, Initial Investment, Goal Target Amount, Goal Tenure, Goal Importance, Loss Threshold Value (LTV), and Cash Infusions/Withdrawals. Fintron's algorithm calculates the optimal portfolio to be invested in today and the corresponding probability of achieving the goal which would be the maximum across all the available options.

On an ongoing basis the algorithm uses "Dynamic Programming" to determine any changes that need to be made to the portfolio based on its performance and/or changes to the macro backdrop. Dynamic Programming is an optimization method that works backwards in time from a set endpoint to arrive at the optimal solution. The methodology provides the flexibility to make changes in the future, such as changes to the asset mix in the goal portfolio or changing the goal target itself or withdrawals/contributions during any year(s) during the goal journey, by providing revised portfolio recommendations and associated probabilities as and when these trigger events happen.

B. Material Risks Involved

Particular investment strategies or investments involve specific risks, including risk of loss, that clients should be prepared to bear. The risks involved, and their degree of significance, for each goal will vary based on each client's investment strategy and the securities held in the Account. The following is a list of certain material risks, related to the significant investment strategies used by third-party advisors and their underlying portfolio managers. Not all possible risks are described below. Additional disclosures are available in the disclosure documents of the software provider that accompanied this document.

Algorithm Risks – electronic or software-based advisory programs, which use proprietary investment algorithms to develop a portfolio for the client based on information provided by the client. The algorithm's ability to recommend an appropriate Investment Strategy may be limited in the case that a client does not provide accurate or complete information.

There are limitations inherent in the use of algorithms to manage Accounts. For instance, an algorithm is designed to manage Accounts according to the asset allocation selected for that Account and is not designed to actively manage asset allocations based on short-term market fluctuations or back-to-back down-market events.

Algorithms are also not designed to consider certain factors such as short-term asset class volatility or individual tax circumstances such as capital gains taxes; rather, its function consists of proposing a portfolio based solely on a client's answers to the online questionnaire, identifying opportunities for reallocation, and issuing buy/sell recommendations accordingly. Investment advisory personnel oversee the algorithm and the portfolios used and produced by the algorithm, but they do not personally or directly monitor each individual Account. Software algorithms are subject to periodic updates, and modifications and changes arising therefrom may have unintended consequences. There is also a risk that the algorithm and related software used for strategy selection, reallocation, and related functions may not perform within intended parameters, which may result in a recommendation of a portfolio that is more aggressive or conservative than necessary, and trigger or fail to initiate rebalancing.

Investment algorithms are supported by proprietary computer code, and coding errors may occur. In addition, investment data and other information about investment securities and other client information used as part of the investment process is received digitally via the App. Although FinTron and the software provider take steps reasonably necessary to verify this and other data, there can be no assurance that the data is complete or error-free as transmitted. Lastly, FinTron is a licensee of the algorithms used to allocate and manage your account. Interruptions in these third-party services or the extension of this license will impact the accounts reliant on them.

Asset Allocation – The Advisers' ability to achieve their investment goal may depend upon their skill in determining a portfolio's asset allocation mix, and/or selecting sub-advisers. There is the possibility that the Advisers' evaluations and assumptions regarding asset classes and the selected sub-advisers will not be successful in view of actual market trends.

Concentration – Concentrating investments in a particular country, region, market, industry or asset class means that performance will be more susceptible to loss due to adverse occurrences affecting that country, region, market, industry or asset class.

Similarly, in the event of economic or political turmoil or a deterioration of diplomatic relations in a region or country where a substantial portion of an Account's assets are invested, the portfolio may experience substantial illiquidity or reduction in the value its investments. Moreover, adverse conditions in a certain region, country, market or industry can adversely affect securities of issuers in other regions, countries, markets or industries whose economies appear to be unrelated.

Cybersecurity Risks – Cybersecurity incidents, both intentional and unintentional, may allow an unauthorized party to gain access to a client's assets, Account or customer data (including private shareholder information), or proprietary information, cause an

Account, the Adviser and any subadvisor and/or their service providers (including, but not limited to, an Account's accountants, custodians, sub-custodians, transfer agents and financial intermediaries) to suffer data breaches, data corruption or loss of operational functionality or prevent an Account's clients from purchasing, redeeming or exchanging shares or receiving distributions. An Adviser and any sub-adviser have limited ability to prevent or mitigate cybersecurity incidents affecting third-party service providers, and such third-party service providers may have limited indemnification obligations to a client, an Adviser or a sub-adviser. Cybersecurity incidents may result in financial losses to an Account and its clients, and substantial costs may be incurred in an effort to prevent or mitigate future cybersecurity incidents. Issuers of securities in which an Account invests are also subject to cybersecurity risks, and the value of these securities could decline if the issuers experience cybersecurity incidents.

Because technology is frequently changing, new ways to carry out cyber-attacks are always developing. Therefore, there is a chance that some risks have not been identified or prepared for, or that an attack may not be detected, which puts limitations on an Adviser's ability to plan for or respond to a cyber-attack against an Account. Like other investment accounts and business enterprises, an Account, its Adviser and any sub-adviser and their service providers are subject to the risk of cyber incidents occurring from time to time.

Growth Style Investing – Growth stock prices reflect projections of future earnings or revenues, and can, therefore, fall dramatically if the company fails to meet those projections. Prices of these companies' securities may be more volatile than other securities, particularly over the short term.

Highly Volatile Markets – The prices of securities may be highly volatile. Price movements of securities in which Accounts may directly or indirectly invest are influenced by, among other things: interest rates; changing supply and demand relationships; trade, fiscal, monetary, regulatory and exchange control programs and policies of governments; and U.S. and international political and economic events and policies. In addition, governments from time to time intervene, directly and/or by regulation, in certain markets. Such intervention often is intended directly to influence prices and may, together with other factors, cause all of such markets to move rapidly in the same direction because of, among other things, interest rate fluctuations. Accounts also are subject to the risk of the failure of any of the exchanges on which their positions trade or of their clearinghouses.

Liquidity – Liquidity risk exists when the markets for particular securities or types of securities are or become relatively illiquid so that it is or becomes more difficult to sell the security, partially or in full, at the price at which the security was valued. Illiquidity may result from political, economic or issuer-specific events; changes in a specific market's size or structure, including the number of participants; or overall market disruptions. Securities with reduced liquidity or that become illiquid involve greater risk than securities with more liquid markets. Market quotations for illiquid securities may be volatile and/or subject to large spreads between bid and ask prices. Reduced liquidity may have an adverse impact on market price and the ability to sell particular securities

when necessary to meet liquidity needs, which may arise or increase in response to a specific economic event or because of a desire to purchase particular investments or a belief that a higher level of liquidity would be advantageous. An investment may become illiquid if the Adviser and its affiliates receive material non-public information about the issuer or the investment. To the extent that a significant portion of an issuer's outstanding securities is held, greater liquidity risk will exist than if the issuer's securities were more widely held.

Management – The investment strategies, techniques and risk analyses employed, while designed to enhance returns, may not produce the desired results. The assessment of a particular security or assessment of market, interest rate or other trends could be incorrect, which can result in losses (realized and/or unrealized).

Market – The market value of securities or other investments managed by the Advisers will go up and down, sometimes rapidly or unpredictably. Investments may decline in value due to factors that affect an individual issuer (such as the result of supply and demand) or a particular industry or sector. A security's market value may also go up and down due to general market activity or other results of supply and demand unrelated to the issuer, such as real or perceived adverse economic conditions, changes in interest rates or exchange rates, or adverse investor sentiment generally. In addition, extraordinary events and their aftermaths, such as epidemics and pandemics; natural, environmental or man-made disasters; financial, political or social disruptions; terrorism and war; and other tragedies or catastrophes, can cause investor fear and panic, which can adversely affect the economies of many companies, sectors, nations, regions and the market in general, in ways that cannot necessarily be foreseen. This is a basic risk associated with all securities. During a general downturn in the markets, multiple asset classes may decline in value. When markets perform well, there can be no assurance that securities or other investments will participate in or otherwise benefit from the advance.

Non-Diversification – Non-diversification of investments means a portfolio may invest a large percentage of its assets in securities issued by or representing a small number of issuers. As a result, the portfolio's performance may depend on the performance of a smaller number of issuers, and it may be more sensitive to a single economic, business, political, regulatory or other occurrence than a more diversified portfolio might be.

Portfolio Turnover – The portfolio turnover rate in certain Accounts may exceed 100% per year because of the anticipated use of certain investment strategies. Other Accounts may experience greater turnover rates due to rebalancing services. Such frequent trading may affect the Account's investment performance, particularly through increased brokerage and other transaction costs and taxes.

Quantitative Model Risk – When executing an investment strategy using various proprietary quantitative or investment models, securities selected can perform differently than expected, or from the market as a whole, as a result of a model's component factors, the weight placed on each factor, changes from the factors' historical trends, and technical issues in the construction, implementation and maintenance of the models (e.g., data problems, software issues, etc.). A model's assumptions or its data inputs may be

inaccurate from the outset or may become inaccurate as a result of many factors, such as changes in market structure, increased government intervention in markets or growth in assets managed in accordance with similar investment strategies. Moreover, the use of computers in collating information or developing and operating a quantitative or investment model does not assure the success of the model because a computer is merely an aid in compiling and organizing trade information. Accordingly, there can be no assurance that a model will achieve its objective.

Risk of Loss – All investments involve the risk of the loss of capital. No guarantee or representation is made that any Account will achieve its investment objective or avoid losses. The value of a security can go up or down more than the market as a whole and can perform differently from the value of the market as a whole, often due to disappointing earnings reports by an issuer, unsuccessful products or services, loss of major customers, major litigation against the issuer, changes in government regulations affecting the issuer or the competitive environment, or investor sentiment. While each Account has its own investment objectives and strategies, there are risks associated with investing in general.

Third Party Systems and Operational Risks–FinTron Inc, the parent company of FinTron Advisors LLC, develops and maintains many of the software and computer systems FinTron uses to deliver its advisory services. However, certain activities are heavily dependent on systems operated by third parties, including Apex Clearing, and other service providers. FinTron has conducted due diligence on these service providers but is not in a position to moderate the risks or reliability of these systems in real time. Systemic failure of any third party system, including those associated with clearing and settlement of transactions, could result in unforeseen errors and disruptions in account servicing which could cause clients to suffer financial loss.

C. Risks of Specific Securities Utilized

Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below are not guaranteed or insured by the FDIC or any other government agency.

Exchange Traded Funds (ETFs) - An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance. Risks in investing in ETFs include trading risks, liquidity and shutdown risks, risks associated with a change in authorized participants and non-participation of authorized participants, risks that trading price differs from indicative net asset value (iNAV), or price fluctuation and disassociation from the index being tracked. With regard to trading risks, regular trading adds cost to your portfolio thus counteracting the low fees that one of the typical benefits of ETFs.

With regard to liquidity and shutdown risks, not all ETFs have the same level of liquidity.

Since ETFs are at least as liquid as their underlying assets, trading conditions are more accurately reflected in implied liquidity rather than the average daily volume of the ETF itself. Implied liquidity is a measure of what can potentially be traded in ETFs based on its underlying assets. ETFs are subject to market volatility and the risks of their underlying securities. ETFs that target a small universe of securities, such as a specific region or market sector, are generally subject to greater market volatility, as well as to the specific risks associated with that sector, region, or other focus. ETFs that use derivatives, leverage, or complex investment strategies are subject to additional risks. The return of an index ETF is usually different from that of the index it tracks because of fees, expenses, and tracking error. An ETF may trade at a premium or discount to its net asset value (NAV) (or indicative value in the case of exchange-traded notes). The degree of liquidity can vary significantly from one ETF to another and losses may be magnified if no liquid market exists for the ETF's shares when attempting to sell them. Each ETF has a unique risk profile, detailed in its prospectus, offering circular, or similar material, which should be considered carefully when making investment decisions.

Tracking Error and ETF Management Risk – ETFs trade like stocks, fluctuate in market value and may trade at prices above or below the ETF's net asset value. ETF shares may be bought or sold throughout the day at their market price on the exchange on which they are listed. However, there can be no guarantee that an active trading market for ETF shares will develop or be maintained, or that their listing will continue or remain unchanged. While the shares of ETFs are tradable on secondary markets, they may not readily trade in all market conditions and may trade at significant discounts due to market forces. Certain ETFs are designed to track a specified market index; however, in some cases an ETF's return may deviate from the specified index. Other ETFs are actively managed and are therefore subject to management risk. Furthermore, unlike traditional open-end funds, investors generally cannot purchase ETF shares from, or redeem ETF shares with, the ETF sponsor. Rather, only specified large blocks of ETF shares called "creation units" can be purchased from, or redeemed with, the ETF sponsor. For more information on any ETF, investors should carefully consider the ETF's investment goals, risks, sales charges and expenses before investing. An ETF's prospectus contains this and other information.

Item 9: Disciplinary Information

A. Criminal or Civil Actions

There are no criminal or civil actions to report.

B. Administrative Proceedings

There are no administrative proceedings to report.

C. Self-regulatory Organization (SRO) Proceedings

There are no self-regulatory organization proceedings to report.

Item 10: Other Financial Industry Activities and Affiliations

A. Registration as a Broker/Dealer or Broker/Dealer Representative

FinTron is a wholly owned subsidiary of FinTron Inc., which is also the parent company of FinTron Invest LLC, an SEC-registered broker dealer and member of FINRA/SIPC, and FinTron Technologies LLC. Registered representative of FinTron Invest LLC, may accept compensation for the sale of securities as described in Item 5 E.

At the client's direction, FinTron instructs its introducing broker dealer affiliate, FinTron Invest LLC, to trade client assets described in the digital-advisory recommendations as approved by the client, under the Advisory Agreement each client has with FinTron. FinTron Invest has entered into an agreement with Apex Clearing Corporation ("Apex"), pursuant to which Apex serves as its clearing broker.

FinTron Invest instructs Apex to clear and settle client's transactions on a fully disclosed basis.

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

Neither FinTron nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

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

FinTron personnel may also be registered representatives of the affiliated introducing broker dealer, FinTron Invest and, for and from time to time, may offer clients products or services outside the scope of this advisory relationship. Clients should be aware that these services may pay a commission or other compensation and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. FinTron always acts in the best interest of the client, including with respect to the sale of commissionable products to advisory clients. Clients are in no way required to implement the plan through any representative of FinTron in such individual's capacity as a registered representative.

D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections

As discussed throughout this brochure, FinTron utilizes third party software to generate allocation recommendations we offer. FinTron does not have direct access to the algorithms underlying this proprietary software. However, FinTron has done extensive due diligence on the software's outputs and has concluded that they accurately reflect, and significantly increase, the client's probability of reaching the goals they create.

Some portion of the periodic fee for each goal will be shared with the software provider as compensation. Additional details are provided in the software provider's documentation which was provided to you along with this brochure.

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

A. Code of Ethics

FinTron has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. FinTron's Code of Ethics is available free upon request to any client or prospective client. A copy of FinTron's Code of Ethics is available to clients and prospective clients at <https://www.fintroninvest.com/disclosures>.

B. Recommendations Involving Material Financial Interests

FinTron does not recommend that clients buy or sell any security in which a related person to FinTron or FinTron has a material financial interest.

C. Investing Personal Money in the Same Securities as Clients

FinTron and its associated individuals are not constrained from buying or selling assets that are the same or different from the ones recommended to clients for their personal accounts. In fact, individuals who are associated with FinTron may hold advisory accounts with FinTron holding the same allocations recommended to clients. Thereby, associated persons may have an interest or position in certain assets that are also recommended to clients. This means that FinTron associates may have a financial incentive to buy or sell the securities held in client accounts. However, this incentive is

limited because FinTron generally recommends highly liquid index funds to its clients, and client activity in such funds is unlikely to materially impact their price.

Each FinTron associate must disclose the holdings within their personal investment accounts on an initial and annual basis, as well as all transactions in such accounts on a monthly basis. FinTron endeavors to make decisions that are in the best interest of its clients and to eliminate, mitigate, and/or disclose any material conflicts of interest that may arise between FinTron and its clients.

D. Trading Securities At/Around the Same Time as Clients' Securities

Please see Item 11.C above.

Item 12: Brokerage Practices

A. Factors Used to Select Custodians and/or Broker/Dealers

As described in section 10.A, FinTron Invest LLC, an affiliate of FinTron is utilized as the introducing broker dealer for each goal. In addition, the broker-dealer both executing your goal related transactions, and the custodian of the securities within your account, is recommended based on FinTron's duty to seek "best execution," which is the obligation to seek execution of securities transactions for a client on the most favorable terms for the client under the circumstances. Clients will not necessarily pay the lowest commission or commission equivalent. FinTron will never charge a premium or commission on transactions, beyond the actual cost imposed by the introducing and clearing broker-dealers. Utilizing FinTron to implement the recommendations provided will require clients to use FinTron Invest as the introducing broker dealer and APEX Clearing Corporation.

1. Research and Other Soft-Dollar Benefits

FinTron receives no research, product, or services other than execution from broker-dealers or custodians in connection with client securities transactions ("soft dollar benefits").

2. Brokerage for Client Referrals

FinTron receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

3. Clients Directing Which Broker/Dealer/Custodian to Use

FinTron will require clients to use a specific broker-dealer to execute transactions. Not all advisers require clients to use a particular broker-dealer.

B. Aggregating (Block) Trading for Multiple Client Accounts

Should the securities recommended within an allocation change, FinTron will submit a block transaction, including transactions for each account holding the affected security. To avoid variation in the execution price across multiple trades, the transactions will be processed as a block, and an average price will be calculated and assigned across all accounts trading for this purpose. These transactions will be executed at FinTron's discretion per the Advisory Agreement related to the specific goal.

Block orders typically fill immediately, but unexpected conditions can result in a transaction filling at a lower quantity than requested. Known as a "partial fill," when this happens, FinTron will allocate the filled quantity on a pro-rata basis, such that each investor is allocated a quantity proportional to the investor's portion of the submitted block. When this happens, additional block transactions may be required to bring each position into line with the intended allocation.

Item 13: Review of Accounts

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

FinTron does not review the individual allocation recommendations of the software algorithm except as described below.

Algorithm monitoring is done using a monitoring process that runs weekly. The activity involves running a predefined set of test cases and comparing it against standard outputs. If there is an anomaly or exception to the expected standard outputs these are escalated to the software provider. This monitoring process is updated as necessary whenever FinTron is notified of code changes or other events that warrant a testing change. The monitoring process is performed by mimicking different client configurations. Failed test cases, if any, are escalated to the software provider's monitoring team for investigation and resolution by that team.

The software provider may also conduct periodic reviews as described in the disclosure documents provided during account opening.

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

If FinTron becomes aware, in the course of its periodic review or upon notification of an issue, that the software is not performing as expected, FinTron will conduct a non-periodic review of affected accounts, alert the software provider of the issue, and determine appropriate corrective steps dependent on the issue.

C. Content and Frequency of Regular Reports Provided to Clients

Digital portfolio management clients will receive at least quarterly a written report that details the client's account including assets held and asset value. This report is generated and delivered by the account custodian, Apex Clearing Corporation.

Item 14: Client Referrals and Other Compensation

A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)

FinTron does not receive any economic benefit, directly or indirectly from any third party for advice rendered to FinTron's clients.

B. Compensation to Non - Advisory Personnel for Client Referrals

FinTron does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

Item 15: Custody

FinTron does not take custody of client assets at any time. Custody of client's accounts is held exclusively at the client's custodian. Clients will receive account statements from the custodian and should carefully review those statements for accuracy.

Item 16: Investment Discretion

After an initial allocation is approved for execution by the client on a non-discretionary basis, FinTron will assume ongoing discretionary authority to manage the invested assets on behalf of the client. This discretionary trading authority permits FinTron to make trades in client accounts on their behalf, so that we may promptly implement changes to the portfolio as recommended by the software. Additionally, discretionary changes may be initiated to rebalance the account.

Item 17: Voting Client Securities (Proxy Voting)

FinTron will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

Item 18: Financial Information

A. Balance Sheet

FinTron neither requires nor solicits prepayment of more than \$1,200 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

Neither FinTron nor its management has any financial condition that is likely to reasonably impair FinTron's ability to meet contractual commitments to clients.

C. Bankruptcy Petitions in Previous Ten Years

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