



MyTimeEquity, LLC

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This Brochure provides information about the qualifications and business practices of MyTimeEquity, LLC (CRD# 316917). If you have any questions about the contents of this Brochure, please contact Mr. Sudhir Pai, Managing Partner at (972) 330-2771 or spai@mytimeequity.com.

Additional information about our Firm is also available on the SEC's website at www.adviserinfo.sec.gov. 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.

We are a registered investment adviser. Please note that use of the term "registered investment advisor" and a description of the Firm and/or our employees as "registered" does not imply a certain level of skill or training. For more information on the qualifications of the Firm and our employees who advise you, we encourage you to review this Brochure and the Brochure Supplement(s).

Item 2: Material Changes

Since MyTimeEquity, LLC filed its last Annual Amendment to Form ADV 2A on March 25, 2026, there have been the following material changes:

The Firm filed an application to transition its registration from the states of CA, FL, GA, NJ, NC and TX to the Securities and Exchange Commission (SEC). As noted on the cover page of this Brochure, registration does not imply a certain level of skill or training.

Items 5 & 6 have been updated as MTE no longer offers a performance-based fee structure.

Item 10 has been updated to reflect current industry affiliations.

Item 15 has been updated to reflect that MTE is deemed to have custody of the assets of the private funds it manages.

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Firm Description:

MyTimeEquity, LLC (or “MyTimeEquity”, “MTE”, “the Firm”, “the adviser”, “we”, “us”, or “our”) is a Texas State Limited Liability Company formed on September 3, 2021 and that sought registration to do business as an investment advisory firm in 2021. Note: The use of the phrase “registered investment adviser” or the term “registered” do not imply a certain level of skill or training.

Our firm is wholly owned by Mr. Sudhir Pai, Managing Partner.

Portfolio Management Services:

The Firm provides discretionary portfolio management services utilizing equity securities, exchange-traded funds ("ETFs"), mutual funds, and alternative investments, selected in accordance with each client's stated investment objectives, risk tolerance, and time horizon as documented in the client's investment policy or advisory agreement.

The Firm also offers portfolio management based on rules-based and strategy-based allocation models derived from written investment theses.

Use of Alternative Investments. Strategies may incorporate real estate and non-real-estate-based alternative investments alongside fixed income holdings for diversification purposes. Alternative investments are generally subject to risks not typically associated with publicly traded securities, including limited liquidity, delayed or limited valuation information, higher fees, and reduced regulatory oversight. Suitability of any alternative investment is assessed against the individual client's risk tolerance and stated objectives.

Proprietary and Third-Party Research. The Firm conducts its own fundamental and technical analysis of equity securities, ETFs, and alternative investments, using third-party research and analytical platforms which may include subscription services, publicly available research, and AI-based research tools, together with the Firm's internally developed rebalancing criteria. The Firm has also entered into an agreement with an unaffiliated platform to provide trade execution and direct indexing services to clients.

The Firm may evaluate and engage unaffiliated third-party developers that create proprietary algorithms or investment strategies for the Firm's use under a contractual licensing or services arrangement. Upon identifying such providers, we will enter into a contractual agreement with them to use their investment platform products. We undertake to disclose the providers of such programs to our clients here in our ADV if we engage them for our clients.

Client Tailored Services and Client Imposed Restrictions

As a fiduciary, an investment adviser is to make only those recommendations that demonstrably are in the client's own best interests, which means that they, too, must be based on an individual's stated and/ or established, individual needs, goals, risk tolerance and investment time horizon. The firm seeks to establish this personal dimension through a careful, fact-finding interview and discussions with each client.

Clients may impose reasonable restrictions on the adviser's discretion to invest in certain securities or types of securities if a client provides clear, written directions to that effect. The client allows the power of discretion to an adviser by means of a limited power of attorney, which the client may revoke at any

time.

A client's ability to impose restrictions on the adviser's discretion also occurs at the beginning of the investment process at which time a client accepts or chooses not to invest in the recommended programs. Clients may withdraw from the programs at any time as well.

Financial Planning:

MyTimeEquity is planning to offer Financial Planning advisory services, fees and parameters to be disclosed at that time.

Other Services where Fees and Parameters are Disclosed at the Time of Commitment:

- Current Employer 401K / Retirement accounts via Broker Link
- Retirement planning
- Income & estate planning

Private Funds and Special Purpose Vehicle ("SPVs")

The Firm serves as the investment adviser to certain privately offered pooled investment vehicles, including SPVs, formed for the purpose of investing in specific securities or investment opportunities.

The SPVs are typically structured as single- or multi-investment vehicles designed to provide investors with exposure to privately held companies, including late-stage and pre-initial public offering ("pre-IPO") issuers. These SPVs are offered to qualified clients through private placements and are managed by an affiliated general partner that is responsible for the overall operation and administration of the vehicle.

The Firm provides investment advisory services to the SPVs pursuant to written advisory agreements.

Each SPV typically has a limited investment objective focused on acquiring direct or indirect interests in one or more portfolio companies. Investments are generally illiquid in case of pre-IPO and may be held for an indefinite period, with distributions dependent on liquidity events such as acquisitions, mergers, or initial public offerings of the underlying portfolio companies. Investors in the SPVs do not have the ability to participate in the day-to-day management of the vehicle, and the affiliated manager retains broad discretion over investment decisions, timing of investments, and disposition of assets.

The Firm is the adviser to two private funds and several Special Purpose Vehicles (SPVs) offered through MTE Private Equity, LLC. For further details, please see the private placement memorandum ("PPM").

Client Assets Under Management

As of 04/23/26, the Adviser managed \$183,983,000 of client assets exclusively on a discretionary basis.

Item 5: Fees and Compensation

Portfolio Management Services

Clients pay a fee based on the assets under management, as detailed in the Advisory Agreement. MyTimeEquity's investment advisory fee is a maximum of 2.00 % of the assets under management. Client agrees to the fees described below which Client allows the custodian to deduct directly from Client's account. Prior to July 1st 2026, MTE offered clients the option of a Performance fee structure and has since ceased this practice. One legacy client remains on this fee structure.

MTE charges fees monthly in arrears on Schwab & Interactive Brokers. Client's fee will be based on the account value on the last business day of the preceding quarter/month, will be due the following business day and will cover that previous calendar quarter/month. Additional assets received into Client's account after it is approved will be charged a pro-rata fee based upon the number of days remaining in the fee period; partial withdrawals of assets prior to the end of the calendar quarter will be charged a pro-rata fee based on the number of days the assets were in Client's account. No fee adjustment will be made for account appreciation or depreciation within a billing period.

0-\$250,000	2% Per annum
\$250,001 – \$500,000	1.5% Per annum
\$501,000 – \$ 1,000,000	1.2% Per annum
\$1,000,000 and above	1% Per annum

We also offer the management of accounts sub-advised by a third-party manager, Jafee Tilchin. These accounts are custodied at Fidelity, and fees are charged quarterly in advance, based on the prior quarter-end value. The fee charged includes the third-party manager's fee and MTE's advisory fee.

Clients who qualify may elect to pay a Performance Fee [see Item 6, following]. Our firm bills its clients for the advisory fees by obtaining each client's signed permission to deduct the advisory fees from that client's account held by the custodian [termed "direct billing."] In the case of some Custodians we are not able to bill directly so we send an invoice to the clients. We bill clients in arrears or in advance, depending upon the custodian's practice.

Our fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, and other third parties such as fees charged by fund managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to our fees, and we shall not receive any portion of these commissions, fees, and costs. All fees paid to us for Wealth Advisory Services are separate and distinct from the fees and expenses charged by any mutual funds or ETFs to their shareholders. These fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, other expenses, and a possible distribution fee. If the fund also imposes sales charges, a client may pay an initial or deferred sales charge; however, we do not generally recommend investment funds that impose sales charges. When MyTimeEquity contracts with a third-party software program provider, we will disclose then if that firm expects MyTimeEquity to pay a portion of the fee we charge our clients. Clients will not have to pay an additional fee to any Third-Party Provider.

We direct clients to this brochure's Item 12 for further discussion of brokerage costs.

Neither the Firm nor any of its supervised persons accepts compensation for the sale of securities or other investment products, including asset-based sales charges or service fees (such as mutual fund 12b-1 fees). The Firm is not registered as a broker-dealer and its personnel are not registered representatives of any

broker-dealer. Accordingly, the Firm does not receive commissions or other transaction-based compensation in connection with client investments.

Minimum Account Fee

MyTimeEquity generally requires a minimum initial investment or account balance of \$5,000 for advisory accounts. The Firm may waive or reduce this minimum at its discretion. Please note, accounts with an initial funding amount of less than \$50,000 shall be subject to a one-time account opening fee of \$100.

Other Ancillary Value-Added Strategy Services Fees

Such services may include, but are not limited to: (i) covered call writing strategies, for which the Advisor may charge an additional annual fee of up to 0.45% of assets under management allocated to such strategy; and (ii) direct indexing services, for which the Advisor may charge an additional annual fee of up to 0.25% of assets under management allocated to such service.

Private Funds and Special Purpose Vehicle (“SPVs”)

MyTimeEquity receives compensation for its services as investment adviser to the two private funds and the SPVs. The Firm receives a management fee paid by the General Partners of the Funds/SPVs and indirectly borne by the Fund’s investors. Additional details regarding the calculation and payment of these fees are set forth in each Fund’s/SPV’s private placement memorandum and other offering documents.

In addition, MyTimeEquity, through its affiliate MTE Private Equity LLC, does participate in carried interest for all Funds & SPV’s as outlined in the PPM or other offering documents. Information on the carried interest will be made available to clients that qualify (i.e. accredited investors).

Additional fees, which include organizational and operating expenses, and may include an acquisition fee and/or a due diligence fee, will apply as detailed in the private placement memorandum and other offering documents.

Accordingly, clients should be aware that they will incur multiple layers of fees in connection with such investments. Further details regarding applicable fees and expenses are set forth in the relevant offering documents.

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

The Firm advises private investment funds that pay performance-based compensation while also managing other client accounts that do not pay such fees. This arrangement may create a conflict of interest because the Firm and its investment professionals may have an incentive to favor accounts that pay performance-based compensation over accounts that do not.

MyTimeEquity seeks to mitigate this potential conflict by applying its trade allocation and investment allocation policies in a manner it believes is fair and equitable over time and by monitoring investment decisions to ensure that no client or account is systematically disadvantaged.

The Firm has one legacy client that has signed up for performance fees on their account. This practice is no longer made available to new clients.

Item 7: Types of Clients

Typically our clients include high net worth and other individuals, corporations and other businesses, pension and profit-sharing plans, charitable organizations, estates, and trusts. We also provide services to a number of private funds and SPV. We are prepared to provide services to other parties as well.

MyTimeEquity generally requires a minimum initial investment or account balance of \$5,000 for advisory accounts. The Firm may waive or reduce this minimum at its discretion.

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

Methods of Analysis: In formulating advice, MyTimeEquity utilizes a combination of fundamental, and technical analysis in evaluating investment opportunities.

Research and Analytical Process

The Firm conducts fundamental and technical analysis of equity securities, ETFs, and alternative investments using a combination of its own proprietary research framework and third-party platforms and data sources, including but not limited to TradingView, Seeking Alpha, and publicly available research,

These tools are used to evaluate market data such as price movements, trading volume, volatility, and correlations among securities, and to accelerate the pace and breadth of the Firm's own research.

All investment recommendations, rebalancing decisions, and trade decisions are made by the Firm's investment professionals based on their own review and judgment. Third-party platforms inform and support this analysis; they do not independently generate or execute trades. The Firm has also developed its own internal criteria to guide rebalancing decisions, which its investment professionals apply on a discretionary basis informed by the above research.

Fundamental Analysis

The Firm may evaluate securities by analyzing company-specific and macroeconomic factors such as financial statements, earnings growth, valuation metrics, industry conditions, interest rate environments, and broader economic trends.

Technical Analysis

The Firm may utilize technical indicators such as momentum, trend analysis, moving averages, volatility indicators, and price pattern recognition to assist in determining entry and exit points for investments. The Firm may rely on both internally developed models and models or signals provided by third-party research providers or technology platforms.

Third-Party Money Manager Analysis

We examine the experience, expertise, investment philosophies, and past performance of independent third-party investment managers in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. We monitor the manager's underlying holdings, strategies, concentrations and leverage as part of our overall periodic risk assessment. A risk of investing with a third-party manager who has been successful in the past is that he/she may not be able to replicate the success in the future. In addition, as we do not control the underlying investments in a third-party manager's portfolio, there is also a risk that a manager may deviate from the stated investment mandate or strategy of the portfolio, making it a less suitable investment for our clients. Moreover, as we do not control the manager's daily business and compliance operations, we may be unaware of the lack of internal controls necessary to prevent business, regulatory or reputational deficiencies.

Risk of Loss. Use of third-party data, charting platforms, and research tools carries risk, including the risk that underlying data is incomplete, delayed, or inaccurate, and the risk that any tool's output does not reflect current market conditions. The Firm reviews and exercises independent judgment over any third-party output before incorporating it into a client recommendation, but cannot guarantee the accuracy of any external source.

B. Investment Strategy and Method of Analysis Material Risks

NOTE: Investment clients should know that investing in securities involves risk of losing the investment capital, a loss the investor must be prepared and able to bear.

The Firm will utilize investments including but not limited to: Stocks, Bonds, ETF's, Structured Notes, money market funds and cash.

Mr. Pai utilizes alternative investments for suitable clients. Alternative investments carry risks for an investor beyond those commonly associated with market investments. Alternative investments include private equity or venture capital, hedge funds, managed futures, art and antiques, commodities, and derivatives contracts. These investments are not regulated by the Securities & Exchange Commission, are usually illiquid (not easily converted to cash) and often do not follow market movements. Collectibles require expert knowledge of the valuation and current market for such items. If agricultural products are included, they carry risks currently associated with climate change and transportation disruptions.

Trading Strategy

The firm's trading strategies include holding for the long term (a year or more), short term purchases (sold within a year), trading (securities sold within 30 days), short sales, margin transactions and option writing.

What may be regarded as "frequent trading" varies according to

- The client and the strategy for that client's specific account – one client may have multiple accounts that apply different strategies
- The type of security or relative mix of securities involved
- The current nature of the market.

We can, upon special request, make investments on margin accounts, but do not do so normally. We have a few client accounts which have margin facility available and it is being discussed with the clients about the risk that strategy may involve.

Structured Notes Risk: Structured Notes can come with or without principal protection. Structured notes with principal protection offer a full or partial return of principal at maturity, regardless of the performance of the underlying assets. However, any guarantee of principal protection depends on the financial strength of the issuer of the security. Structured notes can offer higher potential returns compared to their reference assets but also involve unique risks and complexities in their terms and features. Investors should recognize that other factors may also affect their investment outcomes. Therefore, it is crucial to carefully review the offering documents associated with these investments.

Issuers of Structured Products are not under an obligation to provide liquidity in all circumstances. Even when a market is provided you might not be able to obtain an appropriate price for the product when you sell it. It might also be difficult or impossible to determine a fair price or even compare prices at all, as there is often only one market maker. Always read the investment prospectus to be sure you know whether a specific note offers full or less than full protection or has protection that is conditional or contingent on

other factors.

All investments involve the risk of loss, including (among other things) loss of principal, a reduction in earnings (including interest, dividends and other distributions), and the loss of future earnings. Although we manage assets in a manner consistent with your investment objectives and risk tolerance, there can be no guarantee that our efforts will be successful. You should be prepared to bear the following risks of loss:

- **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.
- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- **Inflation Risk:** When any type of inflation is present, a dollar next year will not buy as much as a dollar today, 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.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- **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 (i.e., Non-traded REITs and other alternative investments) are not.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.
- **Cybersecurity Risk:** A breach in cyber security refers to both intentional and unintentional events that may cause an account to lose proprietary information, suffer data corruption, or lose operational capacity. This in turn could cause an account to incur regulatory penalties, reputational damage, and additional compliance costs associated with corrective measures, and/or financial loss.
- **Pandemic Risk:** Large-scale outbreaks of infectious disease can greatly increase morbidity and mortality over a wide geographic area, crossing international boundaries, and causing significant economic, social, and political disruption.
- **Custodial Risk:** This risk is the probability that a party to a transaction will be unable or unwilling to fulfill its contractual obligations either due to technological errors, control failures, malfeasance, or potential regulatory liabilities.
- **Exchange-Traded Fund Risk (ETFs):** ETFs are subject to market risk, including the potential for price volatility and tracking error relative to their underlying index. Liquidity can vary, and certain ETFs may be affected by changes in market sentiment, interest rates, or economic conditions.
- **Stock Risk (Equities):** Investments in individual stocks carry risks including business, industry, and market risk. Stock prices may fluctuate significantly in response to company-specific events, market trends, or macroeconomic factors, potentially resulting in partial or total loss of capital.
- **Mutual Fund Risk:** Mutual funds are subject to the risks of the underlying securities they hold. They may incur management fees and expenses that can impact performance. Some mutual funds may be more volatile depending on their investment strategy, asset allocation, or sector focus.

- **Alternative Investment Risk:** Alternative investments, including private equity, hedge funds, real estate, or commodities, often carry higher risk and lower liquidity than traditional investments. They may also be subject to less regulatory oversight and may involve complex strategies that increase the potential for loss.
- **Margin Risk:** Margin involves borrowing funds from a broker or custodian to purchase securities, using existing account assets as collateral. While the use of margin can amplify investment gains, it equally amplifies losses — including losses that may exceed the amount of the original investment. If the value of securities held in a margin account declines, the account may be subject to a margin call, requiring the deposit of additional funds or the forced liquidation of securities at potentially unfavorable prices and without prior notice to the client. Interest charges on borrowed margin funds accrue regardless of account performance and will reduce overall returns. The use of margin is not suitable for all investors and introduces a level of risk significantly greater than investing with cash alone.
- **Options and Derivatives Risk:** Options and other derivatives can increase portfolio volatility and may involve leverage. Certain derivatives strategies may result in losses exceeding the premium paid.
- **Digital Asset Risk:** Investments in cryptocurrencies and digital assets involve significant volatility, regulatory uncertainty, cybersecurity risks, and technological risks.
- **Private Fund Risk:** Investments in private funds are illiquid, speculative, and involve a high degree of risk. Investors may not be able to redeem their interests for extended periods and may lose their entire investment.

Please see Item 12 for further description of our brokerage practices. Please see Item 10 for notes on Alternative Investments.

Item 9: Disciplinary Information

We are required to disclose all pertinent facts regarding any legal, regulatory, or disciplinary events that would be material to your evaluation of the Firm or the integrity of our management.

We have no material legal, regulatory, or disciplinary events to disclose in this Item.

Clients can obtain the disciplinary history of the registrant or its representative upon request from any state regulatory body which MTE is registered.

Item 10: Other Financial Industry Activities and Affiliations

Mr. Pai is a partner & CEO of an insurance agency, SurelyNow, LLC, a Texas-based firm offering insurance and annuities. Clients of the adviser may receive insurance-related services from SurelyNow, LLC. This creates a conflict of interest, as Mr. Pai will benefit from fees earned by SurelyNow, LLC in addition to the advisory fees paid by these clients to the Firm. Clients are under no obligation to use the services of SurelyNow, LLC.

Mr. Pai is Sudhir Pai is the CEO of Global Value Add, Inc., an accounting & real estate firm, and Sudhir Pai CPA PLLC, a CPA firm. Mr. Pai does not have signatory power over the Firm's clients' investments or other accounts. Clients of the adviser may receive accounting-related services from these entities. This creates a conflict of interest, as Mr. Pai will benefit from fees earned by these entities in addition to the

advisory fees paid by these clients to the Firm. Clients are under no obligation to use the services of these entities.

Mr. Pai is the 100% shareholder of MTE Private Equity, LLC (MTEPE) and MTE Private Equity GP, LLC. These entities are affiliated entities under common control with the Firm serve as general partners to the private funds and SPVs advised by the Firm. These private funds and SPVs are managed by MTEPE. Clients of the Firm who are accredited investors may also invest in the private funds and/or SPVs managed by MTEPE.

Mr. Pai is the managing general partner of SuMa Monde Kapital Partners GP, LP. Mr. Pai is also a 50% shareholder of SuMa Monde Kapital Partners LLC which acts as manager to a number of private funds. Legacy clients of the Firm who are accredited investors may also be invested in these private funds. These funds are no longer offered to clients of the Firm.

Mr. Pai is CFO of SuMa Monde Kapital Ventures LLC (DBA Alpatron Capital), which acts as manager to a private fund and SPVs. Legacy clients of the Firm who are accredited investors may also be invested in these private funds. These funds are no longer offered to clients of the Firm..

Mr. Pai is Managing Partner with SuMa Monde Real Estate Fund I, LP, a private fund. Legacy clients of the Firm who are accredited investors may also be invested in this private fund. This fund is no longer offered to clients of the Firm.

Mr. Pai is a Managing Partner with TEF Capital, GP, LP and TEF Capital, LLC. These legal entities are not currently in use.

Investors should be aware that the common ownership of the Firm and the ownership and/or control of the entities listed above means that the individual who ultimately controls both the Firm and these entities, directly or indirectly, receives compensation in addition to the Firm's advisory fees, which creates a conflict of interest. The Firm has adopted policies and procedures reasonably designed to identify and mitigate these conflicts, including a written investment allocation policy that establishes objective criteria for allocating investment opportunities on a fair and equitable basis and provisions within each Fund's limited partnership agreement or operating agreement that establish the General Partner's duties and obligations to fund investors.

Recommendation or Selection of Other Investment Advisers and Conflicts of Interest

As noted in Item 4 above, MyTimeEquity has an agreement with Jafee Tilchin Wealth Management, for portfolio platforms for our clients' investments.

NOTE: Alternative Investments: Prior to recommending Alternative Investments to any client, the adviser will assess a client's suitability for such investments, to include the client's objectives and risk tolerance, the type of account and tax consequences from investing, and the investment's liquidity. Alternative Investments should not exceed 35% of the total net worth. Currently the adviser has no connection to such investments as would create a conflict of interest. If such a relationship arises, the adviser undertakes to notify clients not only of the investments' availability but also, of any conflict of interest involved.

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

MTE has adopted a Code of Ethics (“Code”) designed to comply with Rule 204A-1 under the Investment Advisers Act of 1940 (“Advisers Act”). The Code establishes rules for all employees of the Firm and is designed to, among other things, govern personal securities trading activities in the accounts of employees. If an employee of the Firm would like to invest in the same securities (or related securities, e.g. warrants, options or futures) that MTE recommends to clients, we will aggregate clients’ trades with the employee’s trades so that all trades are executed at the same time and at the same price. If it is not possible to aggregate the employee’s transaction with those of our clients, the clients’ transactions will be placed ahead of the employee’s.

The Code is based upon the principal that MTE, and its employees owe a fiduciary duty to clients to conduct their affairs, including their personal securities transactions, in such a manner as to avoid (i) serving their own personal interests ahead of clients, (ii) taking inappropriate advantage of their position with the firm and (iii) any actual or potential conflicts of interest or any abuse of their position of trust and responsibility.

As noted in Item 10 above, investors should be aware that the common ownership of the Firm and the ownership and/or control of the general partner of the private funds managed by MTE and available to accredited investors who are clients of MTE means that MTE’s associated persons who ultimately control both the Firm and these entities, directly or indirectly, receive compensation in addition to the Firm’s advisory fees, which creates a conflict of interest. The Firm has adopted policies and procedures reasonably designed to identify and mitigate these conflicts, including a written investment allocation policy that establishes objective criteria for allocating investment opportunities on a fair and equitable basis and provisions within each Fund’s limited partnership agreement or operating agreement that establish the General Partner’s duties and obligations to fund investors.

The purpose of the Code is to preclude activities which may lead to or give the appearance of conflicts of interest, insider trading and other forms of prohibited or unethical business conduct. A complete copy of our Code of Ethics is available to clients or prospective clients at your request.

Item 12: Brokerage Practices

Research and Other Soft Dollar Benefits

We do not receive formal soft dollar benefits other than execution from broker/dealers in connection with client securities transactions.

Brokerage for Client Referrals

We do not receive client referrals from broker/dealers.

Directed Brokerage

While not routine, the client may direct us to use a particular broker-dealer to execute some or all transactions for the client. This brokerage direction must be requested by the client in writing. In that case, the client will negotiate terms and arrangements for the account with that broker-

dealer, and we will not seek better execution services or prices from other broker-dealers. By directing brokerage, the client may pay higher commissions, other transaction costs, greater spreads, or receive less favorable net prices on transactions for the account than would otherwise be the case. Not all advisers require or allow their clients to direct brokerage. Subject to our duty of best execution, we may decline a client's request to direct brokerage if, in our sole discretion, such directed brokerage arrangements would result in additional operational difficulties.

If the client requests us to arrange for the execution of securities brokerage transactions for the client's account, we shall direct such transactions through broker-dealers that we reasonably believe will provide best execution. We shall periodically and systematically review our policies and procedures regarding recommending broker-dealers to our client in light of our duty to obtain best execution.

We generally recommend Fidelity, Charles Schwab and Interactive Brokers to be the broker-dealers for our clients' transactions. Mr. Pai is not a registered representative of a broker dealer.

Aggregating Securities Transactions for Client Accounts

We do not aggregate or bunch orders. Not aggregating orders may cost a client higher commission costs.

Item 13: Review of Accounts

Persons Involved: Mr. Sudhir Pai, MyTimeEquity's Managing Partner and an adviser representative, performs reviews at least quarterly. Clients are encouraged to discuss their needs, goals, and objectives with us and to inform us of any changes.

Factors that might trigger a review in addition to our periodic reviews include major moves in the national markets or changes in the nation's economy, as well as any information a client makes known to us regarding changes in that client's financial situation or goals all provide important reasons for an adviser to re-evaluate the recommendations it provides to its clients.

At least quarterly, the custodian provides clients with an account statement for each client account, which may include individual holdings, cost basis information, deposits and withdrawals, accrued income, dividends, and performance.

Item 14: Client Referral and Other Compensation.

No one other than a client of our firm pays our firm or related persons, or otherwise provides some economic benefit to our firm, for the investment advice we provide to our clients.

Neither our firm nor a firm related to us through some form of ownership pays someone, directly or indirectly, for client referrals.

Item 15: Custody

Our firm is deemed to have custody of client assets. The practice of "direct billing" has been defined by the SEC as a form of custody, but also as a "modern practice" that does not require annual audits. Direct billing also requires that the client receive at least quarterly statements from the account custodian, showing the advisory fee.

We work with Fidelity, Charles Schwab, Interactive Brokers, and Interactive Brokers LLC. The custodian will send our clients at a minimum a quarterly account statement, monthly statements, or

confirmations for any month in which there was trade transaction activity in the account. NOTE: Clients should review those statements carefully and compare them with any statements they may have received from MyTimeEquity. It is not the custodian's responsibility to ascertain the accuracy of the calculation for fees subtracted from your account.

The Adviser relies on the annual audit exception set forth in Rule 206(4)-2(b)(4) to satisfy its obligations under the Custody Rule with respect to Fund assets. Specifically:

- Each Fund is subject to an annual audit conducted by an independent public accountant that is registered with, and subject to regular inspection by, the Public Company Accounting Oversight Board (PCAOB) in accordance with its rules;
- The audit is performed in accordance with U.S. generally accepted auditing standards (GAAS);
- Audited financial statements for each Fund are prepared in accordance with U.S. generally accepted accounting principles (GAAP); and
- Audited financial statements are distributed to all limited partners (and other investors) of each Fund within 120 days of the end of each Fund's fiscal year (or within 180 days for funds of funds, if applicable).

Item 16: Investment Discretion

A. Our firm exercises discretion over its clients' accounts with regard to the types and amounts of securities bought or sold and the timing of the transactions.

B. Limitations on Discretionary Authority: Suitability parameters, as the client and the adviser establish in the initial interview, are the over-riding limitation on any discretion. If a Client wishes to place reasonable restrictions on the types of securities the adviser will purchase for an account, s/he should discuss with the adviser in advance the types of securities involved in the portfolio logarithm Mr. Pai selects as suitable for that client. Concerned clients should provide a specific list noting what restrictions they wish to be in force.

The firm gains discretionary authority over a client's account only if and when that client signs a limited power of attorney stating that allowance specifically. A client may revoke that permission at any time.

Item 17: Voting Client Securities

It is firm policy that we do not vote proxies,

Our firm does not vote its clients' proxies. We state this in our agreement and here in these disclosures. Our firm urges our clients to read and participate in the voting process tied to the shares they own in various companies as an excellent means for our clients to become familiar with those companies in which they are invested. Clients will receive their proxies or other solicitations directly from the custodian or a transfer agent. Clients may contact Mr. Pai with questions about a particular solicitation by telephone, email or regular mail.

Item 18: Financial Information

We have no financial commitments that impair our ability to meet contractual and fiduciary commitments to clients and we have not been the subject of a bankruptcy proceeding.

We do not require prepayment of fees of both more than \$500 per client, and more than six months in advance; and therefore, we are not required to provide a balance sheet to clients.

This firm has not been the subject of a bankruptcy petition in the last 10 years.