

Form ADV : Part 2 A & B

As of **March 27, 2023**

Part 2A: The Brochure: This brochure provides information about the qualifications and business practices of MyTimeEquity, LLC. If you have any questions about the contents of this brochure, please contact us at Telephone: (469) 702-1272 or spai@mytimeequity.com. **Part 2B: The Brochure “Supplement** provides information about persons providing advice.

2A: Brochure : Item 1 :Cover Page : for

MyTimeEquity, LLC

4512 Legacy Drive, Unit 100

Plano, Texas 75024

[crd # 316917]

Telephone : (469) 702-1272

Email : spai@mytimeequity.com

website :<https://www.MyTimeEquity.com>

*Please note that the information in this brochure has not been approved by the Securities & Exchange Commission or by any state securities authority Additional information about **MyTimeEquity, LLC** is also available on the SEC’s website at www.adviserinfo.sec.gov*

Note: Registration does not imply a certain level of skill or training.'

2A: Brochure : Item 2: Material Changes

If we amend this disclosure brochure, we are to send you either a new copy of the brochure or at least this item 2 describing the changes made so you can decide if you want us to send you a complete, new copy. A summary of material changes is :

_____ attached as an exhibit to or

___X___ included here as part of this updated brochure

or : _____ No summary of material changes is required because there have been no material changes to this adviser's brochure since its last annual updating amendment.

Mr. Sudhir Pai moved from Emerson Equity to Saxony Securities on April 1, 2022.

Mr. Holla registered as an advisory representative. He subsequently resigned from Saxony March 21, 2023 and currently is not employed as a broker dealer agent.

We have come to agreements with SEI (SEI Investments Management Corporation or "SIMC") and Turnkey Asset Management Platform (TAMP, Custodian - Fidelity & TD Ameritrade) for portfolio platforms for our clients' investments.

At present Mr. Pai is not soliciting for the funds: 1) SuMa Monde Real Estate Fund LP and 2) SuMa Monde Real Estate Fund I, LP. He is soliciting through TME for:

1) SuMa Monde Kapital Ventures

2) SuMa Monde Kapital Partners

If you would like a complete copy of the Form ADV Part 2A for our firm, one that includes the changes noted above, please contact us at :

MyTimeEquity, LLC

4512 Legacy Drive, Unit 100
Plano, Texas 75024

Telephone : (469) 702-1272

Email : spai@mytimeequity.com

If you would like us to email to you a copy of the ADV Part 2A and / or any other documents, please give us your permission to do so: sign and date this statement and fax or email a scanned version to us.

I, _____ give my permission to **MyTimeEquity, LLC** to email to me copies of that firm's Form ADV Part 2A and 2B, its privacy policy statement and other correspondence or information the investment adviser must provide to me by law or rule, or deems useful to me as their client / customer. Please send the items to _____ .com

Signature above dated _____

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Item 4. : Advisory Business

4. A. Description of Your Advisory Firm :

MyTimeEquity, LLC (or “the firm” or “the adviser”) is a Texas State Limited Liability Company [IRS EIN 87-2502296] 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’s owners are Mr. Sudhir Pai, Managing Partner, and Mr. Sudhir Holla, Chief Technical Officer, each owning 50% of the firm. Our firm’s business hours are 9a.m. to-5 p.m., Monday through Friday.

4.B. Description of Advisory Services Offered

MyTimeEquity, LLC offers its clients investment advisory services:

- Portfolio management utilizing stocks and bonds selected in co-ordination with a client’s stated goals, risk tolerance and investment period.
- Portfolio management utilizing Algorithmic & Strategy-based investment models for portfolio management. Strategies include the possible use of real estate and non-RE-based alternatives in place of bonds for fixed income investments.

Algorithmic trading (also called automated trading, black-box trading, or algo-trading) uses a computer program that follows a defined set of instructions (an algorithm) to place a trade. The defined sets of instructions are based on timing, price, quantity, or any mathematical model. Apart from profit opportunities for the trader, algo-trading renders markets more liquid and trading more systematic by ruling out the impact of human emotions on trading activities. The advisor maintains a “gate keeper” function with the ability to disallow an algorithm’s trade plan, although not the individual trades within the proposed total of transactions.

We will source portfolio models for MyTimeEquity using the following:

Self Developed Algorithms & Models : We will develop proprietary algorithms using python as the programming language and using platforms such as www.quantconnect.com. The algorithms will include portfolio rebalancing, swing trading and day trading algorithms. These algorithms will use both fundamental and technical indicators to determine the security and timing of trades in the brokerage account. One source for Portfolio models for MyTimeEquity is MyStockDna [website www.mystockdna.com] Mr. Sudhir Holla and Mr. Sudhir Pai are partners in MyStockDna.

At present Mr. Pai is not soliciting for the funds: 1) SuMa Monde Real Estate Fund LP and 2) SuMa Monde Real Estate Fund I, LP. He is soliciting through TME for: 1) SuMa Monde Kapital Ventures and 2) SuMa Monde Kapital Partners

Time Equities Fund : We are planning to solicit for this fund through MyTimeEquity. Disclosure: In soliciting for a fund in which we have an ownership interest, there is always the risk for a conflict of interest, due to the profit we may realize from our clients’ investments.

Third Party Developed Algorithms: We will evaluate third-party (firms other than our own) developers who use their own programming language to create algorithms for our use. 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 and when we engage them for our clients.**

4.C. Client Tailored Services and Client Imposed Restriction

Do we tailor our advisory services to a client's individual needs and how do we do so?

Can clients impose restrictions on investing in certain securities or types of securities?

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.

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

4.D. Wrap Fee Programs

Do we participate in a wrap fee program providing portfolio management services?

NO, we do not use a wrap fee program.

4. E. Client Assets Under Management

As MyTimeEquity, LLC had discretionary and 2 non-discretionary clients as of the filing of its annual updating amendment in March 2023, with assets totaling \$53.14 million.

Item 5 :Fees and Compensation. .

5.A. Method of Compensation and Fee Schedule

MyTimeEquity's investment advisory fee is a maximum of 2.00 % of the assets under management [stated as "Portfolio management utilizing stocks and bonds selected in co-ordination with a client's stated goals, risk tolerance and investment period." in Item 4, above], charged monthly in arrears. Fees are not negotiable. The adviser retains the right to reduce the fee at Mr. Pai's discretion for reasons of acquaintanceship, future prospects and other considerations. The California Code [CCR Section 260.238(j)] requires that advisers disclose that "lower fees for comparable services may be available from other sources".

For its Algorithmic & Strategy-based investment models, to include select strategies such as futures trading, options overlay, shorting strategy, MyTimeEquity may charge a performance fee of up to 30% of the assets so managed. The adviser retains the right to reduce the fee at Mr. Pai's discretion for acquaintanceship, future prospects and other considerations. Subject to the Agreement, clients shall pay (or cause to be paid) to the Advisor an incentive-based fee (the "Performance Fee") with respect to the Portfolios. The adviser shall calculate the Performance Fee as of the end of each Performance Period, as defined in the Agreement, payable annually in arrears. The Performance Fee in respect of each Performance Period shall be equal to thirty percent (30%) of the appreciation of end of year net asset value ("NAV "). Performance fees

will be subject to an optional high water mark meaning that if the account value falls below its year-end peak, the client will not be charged performance fees again until the account value at the next new year end exceeds that previous high. We measure performance results after deducting all fees, account expenses, and brokerage commissions.

5.B. Client Payment of Fees

MyTimeEquity will deduct fees monthly in arrears.

Disclosure : 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. This form of billing is termed "direct billing." We will not practice any other form of "custody."

We are to send to the client a copy of the fee invoice that we send to the custodian for payment of our advisory fees. NOTE: Because MyTimeEquity will deduct fees directly from a client's investment account, it must undertake the safeguards under provision **California Code of Regulation, Section 260.237(b)(3)**: as disclosed in Item 15: Custody.

5.C. Additional Client Fees Charged

Disclosure : Other types of fees or expenses clients may pay in connection with the advisory services. Clients should be aware that opening an investment account carries with it costs beyond the advisory fee our firm charges. When placing a transaction order to buy or sell securities, advisory clients may have to pay any or all of the following charges in addition to the advisory fees charged by this firm.

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.

- Brokerage commissions
- Annual custodian fees
- postage charges
- processing charges
- Ticket charges
- Early surrender or account closing fees
- Transfer fees
- Lawyering fees
- And miscellaneous charges for the administration of securities in a client's account.
- administrative fees for investments in mutual fund fees,
- and 12b-1 fees in addition to administrative fees, and other marketing fees for mutual funds, paid to a broker dealer;
- account maintenance fees charged by a broker dealer for an account, especially if inactive
- Pledging agreement charges
- Custom strategy development

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

5.D. Prepayment of Client Fees

Disclosure : Do clients pay fees in advance? How may a client obtain a refund of a pre-paid fee if the contract is terminated prior to a billed period's end? How will the amount of the refund be determined? NO. We charge clients monthly in arrears, after services have been rendered. The fee is prorated to the number of service days in the month, if a client begins services after a month's first day or terminates services prior to a month's last day.

5.E. External Compensation For the Sale of Securities to Clients

Disclosure : Does the firm or any of its supervised persons accept compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds? NO. Mr. Pai is not a registered representative of a Broker Dealer.

Disclosure 5.E.1. Whenever an investment advisory firm's representatives may earn a commission, or mutual fund management 12b-1 fees, or other forms of sales charges in their capacity as the registered

representatives of a broker-dealer, that arrangement creates an incentive to recommend those sales and, as a consequence, an inherent possibility for a conflict of interest. An advisor is a fiduciary who is required to make only those recommendations for a client that solely are in the client's own best interest, uninfluenced by any calculation of personal gain. Our firm addresses this potential conflict of interest first by informing clients of the conflict in this disclosure brochure. We do not reduce our advisory fees to offset the commissions or markups [or commissions to offset fees.

Disclosure 5.E.2. Clients always have the option to purchase through unaffiliated broker-dealers and their agents those investment products our firm recommends outside the use of our proprietary logarithmic investment portfolio models.

Disclosure 5.E.3 Does our advisory firm receive more than half its revenue from commissions and other sales-based compensation? No, our firm's primary business activity, in time and in revenues, is its fee-based advisory service.

Disclosure 5.E. 4. Do we charge advisory fees in addition to commissions or markups? We charge advisory fees. Our investment advisory firm is not also a broker dealer and therefore does not receive commissions or markups.

Other disclosures for this section : Our firm does **not** primarily recommend mutual funds to our clients. Our algorithms utilize ETF's, stocks and options. We envision using mutual funds, closed end funds, and alternatives.

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

Does our firm charge performance-based fees [fees based on a portfolio's increase in asset value]? **YES**, it does. [See also: Form ADV Part 1A, Item 5. E. (6). / Does our firm have a supervised person who manages an account that pays performance fees?

For select strategies such as futures trading, options overlay, shorting strategy, the firm /Mr. Pai will charge a performance fee of up to 30%. The adviser retains the right to reduce the fee at Mr. Pai's discretion for reasons of acquaintanceship, future prospects and other considerations. For our **California** clients, we will charge such incentive fees only in accordance with the provisions of California Code of Regulations Section 260.234. Performance results will be considered for presentation in soliciting clients after a test period of between one and three (1-3) years.

Subject to the client Agreement, clients shall pay (or cause to be paid) to the Advisor an incentive-based fee (the "Performance Fee") with respect to the Portfolios. The adviser shall calculate the Performance Fee as of the end of each Performance Period, as defined in the Agreement, payable annually in arrears. The Performance Fee in respect of each Performance Period shall be equal to twenty percent (20%) of the appreciation of end of year net asset value ("NAV"). Performance fees will be subject to an optional high water mark meaning that if the account value falls below its year-end peak, the client will not be charged performance fees again until the account value at the next new year end exceeds that previous high. We measure performance results after deducting all fees, account expenses, and brokerage commissions.

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 are prepared to provide services to other parties as well. MyTimeEquity does not require a minimum account size.

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

- A. In formulating advice, the adviser is prepared to apply charting, cyclical, fundamental, quantitative and/ or technical analytical methods.

1. **Charting** – Charting includes a variety of means of analysis that correlate charts, graphs, and similar **market information** to detect patterns that are judged to be predictable, to reoccur in essentially the same way, given the same chartable factors or relationships among factors. It seeks to predict trends and notice variations in those trends, using various calculated averages.

Cyclical – This form of analysis classifies sector types of stock and possibly specific stocks with regard to their relation to recurring up and down business cycles and/ or market movements.

Certain kinds of stock show marked tendencies to mirror these larger economic movements, either directly or inversely. Automobile industry stocks, housing stocks, and many others belong to these groups. Others, such as food-related stocks, have little or no relation to these cyclical economic movements. It is important for the analyst using cyclical predictors to have a good understanding of how certain industries relate to the overall economy and any verifiable changes occurring within the system, to ascertain which business sectors will be affected and how greatly by economic changes.

Fundamental Analysis – Called the “bottom-up” approach to investing, a fundamental analysis seeks an in-depth understanding of a **specific firm/** company to evaluate its intrinsic value and its future prospects before investing in its stock. Such an analysis studies the firm’s management, its debt, equity and cash flow, history of financial performance/ growth, dividend payout percentages, its products, operating efficiency and marketing structures, among other factors. The firm’s balance sheet and income statement are two key sources of information about the firm.

Fundamental Analysis will compare a firm’s stock price with its earnings per share and its net earnings to its gross revenues and compare both with the averages for that industry sector. The ratio of current liabilities to current assets is another important element of this form of evaluation. A central focus is deciding whether the stock is over-valued or undervalued.

As a term in large-scale economics, a fundamental analysis studies gross national product, inflation and interest rates, trade and unemployment trends, consumer confidence, savings and spending patterns and inventories in order to predict the larger movements of national and international economies. These larger concerns greatly influence the elements considered in a fundamental analysis of any given company.

Quantitative – Quantitative analysis uses measurable factors such as the value of assets, the cost of capital in use and its profitability, sales patterns both historical and projected for specific companies within the current and anticipated framework of a range of economic factors, including the markets for securities and financing. To be an effective tool, it must be combined with qualitative evaluations.

Technical – Technical Analysis is, together with fundamental analysis, one of the two major schools of stock market study. This form of value analysis focuses on patterns of **volume and price fluctuations** for a **given stock** as compared to the activity of the larger, general market(s)

indicators. Securities are evaluated for purchase or sale based on an analysis of market statistics such as volume and prices over time as seen on charts, etc. that are believed to establish relational patterns that can predict future movements in the markets.

This relative comparison has little or no concern for any company's fundamental structure, production or worth. Market indicators kept in view include volume and direction of market activity, as indicators of supply and demand for securities, often using one or more established index/ indices, such as the NASDAQ, S&P 500, and the Dow Jones Industrial Average. Trends and Penetrations (e.g. of previous "highs") are another type of indicator used. Patterns discerned, often using charts for a grasp of various factors' relationship, can suggest future market moves and their effects on stocks in general or on particular sectors of the market.

Third Party Money Managers

MyTimeEquity does not refer its clients to third party advisers. It does seek out third party advisers that also use logarithmic models for investment portfolios and will offer to purchase or rent such computerized programs, which it will identify to the client in the firm's disclosure statements. In addition to these methods, the firm considers tax consequences in its capital management recommendations, and the goals, needs, objectives, and risk tolerances of the client. Our advisory firm does not attempt to predict short-term trends and/or market movements, except in rare instances dictated by sudden changes in a client's circumstances.

It supports both "active" and "passive" index investment strategies, combining both strategies to create portfolios containing longer-term core holdings and those the Advisor believes adds value or "alpha" to client accounts.

MyTimeEquity has agreements with SEI (SEI Investments Management Corporation or "SIMC") and Turnkey Asset Management Platform (custodian, Fidelity) for portfolio platforms for our clients' investments.

"SIMC has developed various model mutual fund asset allocation portfolios (the "Mutual Fund Models") designed to be invested in accordance with a stated investment objective or goal (the "Mutual Fund Models Program"). SIMC currently develops its Mutual Fund Models through two underlying programs, described in various SEI literature as either SEI's Institutional Mutual Fund models or SEI's Goals Based Investing models.

The adviser uses is prepared to use various sources of information for its analyses; to include any or all of the following :

- Financial newspapers and magazines
- Research materials prepared by others
- Corporate rating services
- Timing services
- Annual reports, prospectuses, filings with the Securities and Exchange Commission
- Company press releases

8. 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.

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.

Problems encountered using a **charting analysis** : Charting assumes

- 1) an accurate correspondence between real events and the factors charted as selected;
- 2) and that patterns can be detected in such charts such that
- 3) they are recognizable in advance, predictable as drawn from recurring and therefore essentially mechanistic financial events.

It is a complicated theory. It depends upon a basic assumption that the fundamental financial influences are not radically different in the time periods considered. That assumption is a concept that recently has been questioned on a number of levels.

Particular stocks may diverge from the market/ sector averages radically. Charting may therefore need to be paired with another form of analysis such as fundamental or technical analyses in order to look more closely at particular securities.

The time period most suitable for use in charting analyses depends on an investor's holding period, portfolio structure, and other factors. The choice of relevant segments of performance over time and the understanding of their place in mapping the forces within the larger time period framework is another consideration. Time spent using one analytical method will compete with other analytical methods which might have proven more useful and profitable.

Risks inherent in using a **cyclical method of analysis** : The analysis is applied to limited kinds of stocks, which either could limit a portfolio or require other forms of investing whose analyses would then need to be related to and integrated with the concepts and investment goals inherent in a cyclical view. Understanding business cycles is a complicated endeavor at the least.

The time involved in these cycles is generally longer historical periods whose effectiveness may easily be eclipsed by other forms of market action. Changes in the economy may vary in the magnitude of their cyclical effects from period to period.

Deciding when to enter into a predicted cycle and when to leave can require very careful monitoring; demand for certain cyclical industry items may not always be predictable if a significant portion of consumption is from certain foreign purchasers, the Chinese Peoples Republic, for example. Time spent using one analytical method will compete with other analytical methods which might have proven more useful and profitable.

The risks inherent in using a **fundamental analysis** : The factors involved can require time-consuming study that can fall behind the need to make decisions, if such factors begin to change rapidly. Few of the numbers are absolutes; many are relative to other factors or industry sector information. Most require intelligent judgment and experience to be applied meaningfully to stock values.

Fundamental analysis places value on the financial structure and health of the firm to be invested in. These factors at times are of little or no interest to the market place, such that the stock

prices for very sound companies may wither when investors look to other reasons and areas for investing. For a relatively short time period, a firm can falsify facts to hide poor performance or a fragile financial situation. The independence of balance sheets' and other reports' numerical information from such possible manipulation may not be readily verifiable.

Additionally, time spent using any one analytical method will compete with other analytical methods which might have proven more useful and profitable.

Quantitative analysis must be combined with qualitative evaluations to be an effective tool..

Technical Analysis : Problems encountered using a technical analysis : Technical analysis purports to see patterns deemed repeatable in similar market conditions. Market conditions may consist of many factors any one of which may alter the outcome of an otherwise very similar situation. No one indicator is absolutely reliable, and a multiple of indicators may just as likely complicate understanding and evaluation as much as or more than it allows deeper insight into the market's mechanics.

The understandings offered clients in explanation tend to use generic Technical Analysis, while the working concepts that are derived from those basics and modified by experience and a firm's emphasis may well be hidden in part or completely as proprietary strategy /strategies that may let one advisor or market participant outperform another.

Technical analysis assumes that all the market factors are known to and considered by all the market's participants, although, in fact, the market can act in highly partial and even apparently irrational ways. A market termed "dynamic" indicates a sense that the underlying causal relationships may be shifting.

Risks in using **third party managers'** methods and strategies : As the managers' strategies and methods may vary widely, they may include the risks noted above in a fundamental analysis or others specific to their methods. None is a proven, absolutely sure means of obtaining positive results. There is always a risk-return relationship : the greater the chance of a higher return on an investment, the higher will be the risk of loss as well.

Trading Strategy

An advisor must explain the material risks involved in frequent trading if its strategy involves frequent trading of securities. An advisor must explain how frequent trading can affect performance.

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. Margin accounts require deposits by 10 am of the morning following the margin call, and options have an expiration date, after which the option itself is worthless.

All these investment practices are intended to enhance the portfolio's value and ability to meet a client's stated goals. All trades will add some costs to be deducted from a client's account and could reduce the overall return or growth in a client's account, if carefully measured against what its value would have been had the adviser not placed the transactions.

8.C. Security Specific Material Risks

Do we recommend primarily a particular type of security? What are the material risks involved with that type of security? Are those risks unusual or significant?

We primarily recommend ETF's, stocks and options. We are prepared to provide advice on most types of securities :

| | |
|--|---|
| <u>Equity Securities</u> | Notable risks involved with this type of investment |
| exchange-listed securities | Market fluctuations can bring losses, lower dividends |
| over-the-counter securities | More susceptible to market fluctuations; higher risk |
| foreign issuers | If not under US financial reporting standards; higher risk |
| Corporate debt securities | Same as exchange listed, corporate bonds involve credit risk |
| <u>Investment company securities</u> | |
| mutual fund shares | Market fluctuations can bring losses; various fees |
| US government securities | Returns can be low or even, rarely, negative. As hedge against equity market risk, mirror them. |
| Options contracts on securities | Market fluctuations can bring losses; must make transaction to realize profits; contract expires worthless |
| Options on commodities | |
| Futures contracts on : Tangibles Intangibles | Futures contracts on Intangibles : market fluctuations and tangibles : knowing when to get out of in time , or else deliver, if short or take possession, if long |

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

Item 9: Disciplinary Information

What facts about any legal or disciplinary event involving our firm or its personnel should you know of, because it is material to an evaluation of the integrity of our firm or its management persons?

The SEC requires that we inform you, our client, if our firm or any of our management persons has been involved in any of the events listed below in 9. A, B, and C. and, beyond those points, if there is any material fact about any legal or disciplinary event that you should know about in order to evaluate our integrity. You may also see these same questions answered online at the investment adviser public disclosure site (IAPD), in Part 1A, Item 11.

Neither our firm nor any of our management persons been involved in :

9. A. Criminal or Civil Actions : A criminal or civil action in a domestic, foreign or military court of competent jurisdiction.

9. B. Administrative Enforcement Proceedings : An administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority.

9. C. Self Regulatory Organization Enforcement Proceedings : A self-regulatory organization (SRO) proceeding.

Item 10: Other Financial Industry Activities and Affiliations

A. Broker-Dealer or Representative Registration

What material relationships does our firm or any of our management persons have with related financial industry participants? What material conflicts of interest may arise from these relationships and how are these conflicts addressed? // Have we or has any of our management persons, registered either as a broker-dealer or as the representative of a broker-dealer? / OR, Do we or any management person have such a registration pending? NO. As a fiduciary, Mr. Pai is to place orders for transactions for advisory clients only when such actions are in the client's demonstrable interest, free from any pecuniary interest on Mr. Pai's part.

B. Futures or Commodity Registration

Have we, or has any of our management persons, registered as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of any of these entities named here? OR, Do we or any management person have such a registration pending? **No**, neither the firm nor any management person is or has sought to be registered as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of any of these entities named here.

C. Material Relationships Maintained by this Advisory Business and Conflicts of Interest

Do we have any "related person" – a person or a firm that we control or that controls us through ownership or as an officer – with whom we have a material relationship, any arrangement that may cause a conflict of interest when providing our clients with investment advice?

Mr. Pai is a licensed insurance salesperson and tax consultant. Those services include investments in Mr. Pai's Time Equities Hedge Fund, SuMa Monde Real Estate Fund, LP and SuMa Monde Real Estate Fund I LP, pooled investment vehicles he manages.

Mr. Pai is the managing general partner of SuMa Monde Kapital Partners GP, LP as well.

Mr. Pai is a partner in a CPA firm, Sudhir Pai CPA, PLLC, based in Texas. Mr. Pai does not have signatory power over clients' investments or other accounts. He is also a partner in an insurance agency, SurelyNow, LLC, a Texas-based firm offering insurance and annuities.

Mr. Pai is a passive partner in the following business enterprises: **myStartupCFO LLC** : (passive partner since September 2019), not investment related, no work hours required, a CFO entity.

Imytaxfiler, LLC, Pmytaxfiler, LLC, and GVA Franchise, LLC : (passive partner since September 2019), not investment related, no work hours required, tax business entities. Otherwise, our firm has no related firm or person who is :

- a Broker Dealer
- a Municipal Securities Dealer
- a Government Securities Dealer or Broker
- a bank or a thrift institution
- a futures commission merchant, commodity pool operator or commodity trading advisor

- a lawyer or a law firm
- a closed-end investment company
- a private investment company
- an offshore fund
- a bank or a thrift institution
- a pension consultant
- a unit investment trust
- a sponsor or syndicator of limited partnerships.

Mr. Pai is able to provide other advisory services such as Financial Planning and Retirement Planning by other agreement. Those services are not included among the services MyTimeEquity provides. If Mr. Pai recommends to a MyTimeEquity client that s/he seek such services, there is a clear risk for a conflict of interest if in any such recommendation there would be compensation to Mr. Pai as it would provide creates an incentive to recommend the service. Disclosing this potential risk of a conflict of interests and Mr. Pai's fiduciary duty to recommend only those products or services that are in a client's own best interest are the two means of addressing this matter.

An adviser's **related persons** are: (1) the adviser's officers, partners, or directors (or any person performing similar functions); (2) all persons directly or indirectly controlling, controlled by, or under common control with the adviser; (3) all of the adviser's current employees; and (4) any person providing investment advice on the adviser's behalf.

D. Recommendation or Selection of Other Investment Advisers and Conflicts of Interest
Do we recommend or select other investment advisers for our clients? **NO**. We do not.

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. Mr. Sudhir Pai advises his clients regarding investments in:

- 1.) SuMa Monde Kapital Partners
- 2.) SMK Ventures
- 3) [scheduled, pending review] Time Equities Hedge Fund

The Investment Manager for the above funds is SuMa Monde Kapital Partners, LLC; the general partner is SuMa Monde Kapital Partners GP, LP. MyTimeEquity, LLC does not solicit its clients to invest in any of these funds, nor does MyTimeEquity, LLC act as an adviser to the 3 funds. To avoid a potential conflict of interests, MyTimeEquity does not solicit investments /interests in the affiliated pooled investment vehicles or private funds noted above.

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

A. Code of Ethics Description

As required by SEC rule 204A-1 or similar state rules our firm has adopted a Code of Ethics.

Our firm's Code of Ethics describes our policies and procedures to abide by the law's prohibition against insider trading, including our reviews of our own persons' trades, and other ethical considerations. Persons who are "Access Persons" – that is persons with access to client and company

information that potentially could be “insider information” submit copies of their holdings and transactions for other authorized persons in the firm to review to avoid the unfair use of such information, as well as to check on actions that might be prohibited, such as front running. Other ethical considerations include an adviser’s fiduciary duty to its clients and employees’ duties to be honest and proficient. We will provide our clients/ potential clients, a copy of our Code of Ethics upon written request.

Please note that using any insider information, information that is not readily available to all participants in the securities markets (upon making a reasonable effort to obtain that information), for any person, ourselves or relatives or clients or any other person, is strictly illegal and punishable by fines and imprisonment.

How our firm controls sensitive information:

- building security : cameras in office, visitor screening,
- locked office doors and locked cabinet files
- password protected computer screens and databases, computer firewalls, encrypted email server.
- fire prevention equipment
- office area under continual supervision.
- employee handbook

The firm has a handbook to prevent employees from misusing any inside positions

11. B. Investment Recommendations Involving a Material Financial Interest and Conflicts of Interest [also in Form ADV Part 1A, Item 8. (1)(2) (3)] : Does our firm or a related person recommend to our clients, or do we buy or sell for our clients’ accounts, securities in which we or a related person has a material interest?

Our firm and/ or its associates **do**

- buy or sell for the firm or for themselves securities (other than shares of mutual funds) that we also recommend to our advisory clients;
- buy or sell for the firm or for themselves shares of mutual funds that we also recommend to our advisory clients;
- invest or are permitted to invest in securities related to those we may recommend to clients, such as derivatives

Our firm and its associates **do not**

- buy securities for the firm or for themselves from advisory clients (principal transactions);
- sell securities the firm or its associates own to advisory clients (principal transactions);
- in their capacity as a broker/ dealer agent, transact purchases or sales of any client’s securities directly to any other person (an “agency cross transaction” that side-steps using a securities market place)
- recommend securities (or other investment products) to our advisory clients in which our firm or any person or other firm related to our firm has some other proprietary (ownership) or other financial interest.
- act as an investment adviser to an investment company that we recommend to our clients.

As noted elsewhere in this ADV, MyTimeEquity, LLC and its adviser/ manager, Mr. Sudhir Pai, DO NOT RECOMMEND to MyTimeEquity’s clients that they invest in any of the pooled vehicles :[*SUMA MONDE REAL ESTATE FUND LP*](#), [*SUMA MONDE REAL ESTATE FUND I LP*](#), [*TIME EQUITIES HEDGE FUND*](#)] in which Mr. Pai has a material interest. **Time Equities Fund** : We are planning to solicit for this fund through MyTimeEquity. Disclosure: In soliciting for a fund in which we have an ownership interest, there is always the risk for a conflict of interest, due to the profit we may realize from our clients’ investments.

11. C. Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest **Personal Trading** : investing in the same or related securities

Does our firm permit itself, its personnel, or a person related to our firm (by ownership or other forms of control) to invest in the same securities that we recommend to our clients, or in securities that are related to those securities, such as options or other derivatives?

In order to trade the algorithmic trading strategies, we will be leveraging a mirror-trading platform which mirrors the trades placed in one account in another account. Our algorithmic strategies hence will be executed in the firm's accounts and then mirrored in the client's account. The nature of the technology platform will therefore necessitate trading the same securities to enable our clients to do so as well.

Does any person in our firm participate in or have an interest in our clients' transactions? How does such a person participate or what is the interest and what conflicts of interest can that create? No. No one in the firm has a financial interest in any investment transaction the firm recommends to its clients. Examples of such interests would include an adviser recommending that clients invest in a pooled investment vehicle that the firm advises or for which the investment adviser serves as the general partner, or when an adviser with a material financial interest in a company recommends that a client buy shares of that company.

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

Personal Trading : investing in the same or related securities at the same time.: What specific conflicts do we have when our firm or a related person trades in the same securities at or about the *same time* as it places trades for a client's account? None, insofar as we disclose to our clients that we may do so. We do not aggregate trades. We may invest in the same Algorithmic & Strategy-based investment models for portfolios as those we use for our clients.

11. B., C., and D. **The risk for a conflict of interest** in the actions noted above is that an advisor could in some instances use a client trade to influence the price of a security to benefit the advisor's investments, which is forbidden by rule. An advisor is to recommend and place only those trades that demonstrably are in the client's own best interest, free of any influence of potential gain for the adviser. This risk does not exist in the case of mutual funds, ETFs and the other investments slated for the algorithmic funds, as they are large, broadly based, widely traded and/ or settled at the end of a day's trades. Mr. Pai and Mr. Holla are to review each other's trading activities to watch for any trades that have the potential of contravening required fiduciary practice.

Item 12: Brokerage Practices

12. Factors Used to Select Broker-Dealers for Client Transactions A. Does our firm select a broker/ dealer for you? On what basis do we do so? How do we determine the reasonableness of the broker's compensation (commission charges)?

We **do** recommend Fidelity and TD Ameritrade to be the broker-dealers for our clients' transactions. Mr. Pai, is not a registered representative of a broker dealer.

12. A. 1. Research and other "Soft Dollar" benefits :

Do we have any conflicts of interest such as receiving "soft dollars" from the broker/ dealer?

We receive **NO** soft dollar benefits from a broker-dealer.

Required disclosures / explanations:

- a. If an adviser uses client brokerage commissions (or markups or markdowns) to obtain research or other products or services, the adviser receives a benefit in not having to produce or purchase them itself.
- b. Any such benefit creates an incentive to select or recommend the broker-dealer that provides it; an adviser's duty is to select a broker-dealer based on the most favorable execution services for the adviser's clients.

Clients need to understand that "soft dollars" are an enticing benefit for an adviser insofar as they provide access to research and / or other products both of use to the adviser in its business and at no expense to the adviser. Clearly, such an enticement creates an incentive to use the broker-dealer in question and may cause the adviser to use a broker that charges the adviser's clients higher commission rates than another broker-dealer. An adviser has a duty to seek the best execution of trades for its clients, which includes considerations in addition to the commission rate, however.

12. A. 2. Brokerage for client referrals

Do we direct brokerage to a specific broker-dealer in return for **client referrals** either to our firm or to a related firm? NO. [Referrals create an incentive to use the broker-dealer not for the services a client will receive, but due to the benefit to the advisory firm.] Directed brokerage may result in brokerage costs that are higher than a client might obtain from another broker-dealer.

12. A. 3. [a] Do we "routinely recommend, request or require" our clients to direct brokerage? [describe the practice/ policy] No, we do not. **Clients should know that not all advisers do require directed brokerage.**

Is the broker-dealer in question an affiliate of our firm or have some other economic relationship? NO.

[b] Do we permit a client to direct brokerage to a specific broker-dealer? If we were to do so, clients should know that directing brokerage may cost a client more

12. B. Aggregating Securities Transactions for Client Accounts

When we place orders with a broker/ dealer for our clients, do we aggregate or "bunch" your trade order with orders for other clients? NO, we do not aggregate or bunch orders. Not aggregating orders may cost a client higher commission costs.

NOTE: We work with Fidelity, TD Ameritrade, SEI, and Interactive Brokers, and other reputed custodians. The qualified custodian for algorithmic trading is Interactive Brokers LLC.

Item 13: Review of Accounts

13. A. Schedule for Periodic Review of Client Accounts or Financial Plans and Advisory Persons Involved Does someone in our firm review your investment account portfolio and how often?

Mr. Sudhir Pai, MyTimeEquity's Managing Partner and an adviser representative, performs reviews at least quarterly. Because we send you an account statement, we urge you, our client, to compare carefully that account statement with any other statement you may receive from the account's qualified custodian.

13. B. Review of Client Accounts on Non-Periodic Basis

What factors might trigger a review in addition to our periodic reviews?

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.

13. C. Content of Client Provided Reports and Frequency

What regular reports do we or others provide you? Are they written reports? What do they contain? MyTimeEquity will provide its clients with monthly and quarterly portfolio written reports that include the portfolio performance and positions.

Item 14: Client Referral and Other Compensation.

A. Economic Benefits Provided to the Advisory Firm From External Sources and Conflicts of Interest : Does someone other than a client of our firm pay our firm or related persons, or otherwise provide some economic benefit to our firm, for the investment advice we provide to our clients? [12b-1 fees; other; sales awards or prizes] NO.

B. Advisory Firm Payments for Client Referrals: Does our firm or a firm related to us through some form of ownership pay someone, directly or indirectly, for client referrals? **NO.**

Item 15: Custody

Does our firm have custody of your assets? YES. 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, TD Ameritrade, SEI, Interactive Brokers and other reputed custodians. The qualified custodian for algorithmic trading is Interactive Brokers LLC. Interactive Brokers uses the largest US trading platform. 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.

NOTE: Because MyTimeEquity will deduct fees directly from a client's investment account, it must undertake the following safeguards under provision **California Code of Regulation, Section 260.237(b)(3)**: and disclose them here in Item 15:

A. MyTimeEquity, LLC has custody of a client's funds and securities solely as a consequence of its authority to make withdrawals from client accounts to pay its advisory fee.

B. The investment adviser must first have written authorization from the client to deduct advisory fees from the account held with the qualified custodian.

C. Each time a fee is directly deducted from a client account, the investment adviser concurrently:

i. Must send the qualified custodian an invoice or statement of the amount of the fee to be deducted from the client's account; and

ii. Must send the client an invoice or statement itemizing the fee. Itemization will include the formula used to calculate the fee, the value of the assets under management on which the fee is based, and the time period covered by the fee.

D. MyTimeEquity must notify the California Commissioner in writing that the investment adviser intends to use the safeguards provided in this paragraph (b)(3).

Item 16: Investment Discretion

A. Does our firm have discretionary authority over your assets? YES. It does exercise discretion over its clients' accounts with regard to the types and amounts of securities bought or sold and the timing of the transactions.

B. What limitations are there, or can you place, on our 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

A. Does our firm have or will it accept authority to vote client securities? NO.

B. This is our policy and our procedures : 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

A. Balance Sheet : Our firm does not have custody of our clients' funds or securities. Therefore we do not have to provide a Balance Sheet in this section.

Custody situations : Does our firm have custody of your funds or your securities investments?

- We do not require prepayment of a fee of \$500 or more, 6 or more months in advance of services.
- Do we practice "Direct Billing" (charging our fees to your account)? We do practice "direct billing" as described above in Item 15 : "Custody." Most regulators deem this a "modern practice" that does not require audits or being marked as "custody" in the form ADV.
- Do we or someone in our firm act as the trustee for an advisory client? **No, we do not.**

18. B. Financial Conditions Reasonably Likely to Impair Advisory Firm's Ability to Meet Commitment to Clients : If our firm has discretionary authority over your assets [see Item 16] or custody of our clients' securities or funds, or require or solicit prepayment of fees of \$1,200 or more (for SEC registrants, but only \$500 or more for state registrants), six or more months in advance, then we must disclose if there is any financial condition reasonable likely to impair our firm's ability to meet its contractual commitments to its clients.

Does our firm have any financial condition that reasonably could impair our ability to meet our contractual commitments to our clients? This question is important, especially if an investment adviser has discretion, custody or both; if our financial condition were precarious, our clients would be exposed to increased risks that we might not manage their assets properly, according to the SEC. Prepaid fees might not be refunded if an advisory firm were to cease being able to do business due to insolvency. **No**, MyTimeEquity has no financial difficulties as of the time of this ADV Part 2A, **that is, MyTimeEquity has no financial condition that is reasonably likely to impair MyTimeEquity's ability to meet contractual commitments to clients**. The firm will inform clients if it has any threatening financial difficulties.

18. C. Bankruptcy Petitions During the Past Ten Years :

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

Item 19: Requirements for State Registered Advisers.

A. Principal Executive Officers and Management Persons

Mr. Sudhir Pai is the 50% owner and managing member of MyTimeEquity, LLC; he is also one of its investment adviser representatives. Clients may see Mr. Pai's educational background in the Part 2B for him that follows this Item 19.

Mr. Sudhir Holla is a 50% owner and the Chief Technology Officer, creating/ selecting sources of algorithmic investment programs for Mr. Pai's consideration and use as he deems suitable for advisory clients. Mr. Holla registered to be an investment adviser representative of the firm on April 22, 2022. Mr. Holla's educational history is:

- 1992 - Electrical Engineering, India
- 1994 - MBA, IIM, India

B. Other Business Activities Engaged In

Mr. Pai's other business activities are disclosed in the Part 2B attached, following this Item 19. Please see also Item 10: Other Financial Industry Affiliations, in this ADV 2A.

The approximate amount of time spent on these activities is :

- 5 hours per week providing insurance products and/or tax services
- 2 hours per week working with Suma Monde Kapital

Mr. Sudhir Holla

In addition to his theoretical model building for MyTimeEquity (since September 2021), Mr. Holla is also the owner of Koalla Technologies LLC in Frisco, Texas, a technology firm that develops algorithms for trading in the market, requiring 4-8 hours per day, during or after market hours. Previously he has been employed at:

- Accenture in Dallas, Texas, as a manager [02/2016 – 10/2020]
- UGAM in Dallas, Texas, as a Senior Vice President [08/2012 – 01/2016]
- Infosys in Dallas, Texas, as a Vice President [11/1999-08/2012]

C. Performance Based Fee Description

The firm will charge a Performance Fee for some investment types or programs. Clients should understand that performance-based compensation could create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client.

D. Disclosure of Material Facts Related to Arbitration or Disciplinary Actions Involving Management Persons

Neither the firm nor any management person has been involved in one of the events listed under this section as regards arbitrations for investment-related activities, including fraud, nor has either been found liable in a civil, self-regulatory or administrative proceeding involving the same unethical and/ or illegal practices.

E. Material Relationships Maintained by this Advisory Business or Management Persons With Issuers of Securities : Neither our firm nor any management person of the firm has any relationship arrangement with any issuer of securities.

As noted previously and in Part 2B, following, Mr. Pai is the manager of a number of funds:

[SUMA MONDE REAL ESTATE FUND LP,
SUMA MONDE REAL ESTATE FUND I LP,
TIME EQUITIES HEDGE FUND]

which are planned to be offered through a Broker Dealer/ Investment Adviser.

MyTimeEquity, LLC

4512 Legacy Drive, Unit 100
Plano, Texas 75024
[crd # 316917]

Telephone : (469) 702-1272

[March 8, 2022]

Part 2B: The Brochure Supplement : Here we provide information about advisory personnel on whom you rely for investment advice. We must provide this supervised person's supplement to you, our client initially at or before the time when *that* specific supervised person begins to provide you with advisory services.

Item 1. Cover Page.

This brochure supplement provides information about Sudhir Pai that supplements the MyTimeEquity, LLC brochure. You should have received a copy of that brochure. Please contact Mr. Pai, or other office personnel (Priya, Sharath, Rachel), if you did not receive MyTimeEquity, LLC's brochure or if you have any questions about the contents of this supplement. Additional information about Mr. S. Pai is available on the SEC's website at www.adviserinfo.sec.gov.

Mr. Sudhir G. Pai
Born 1975
CRD # 5928622

Item 2. Educational Background and Business Experience

Education & Licensing:

Bachelor of Commerce from Bangalore Karnataka University, India, received 1995
Fellow Chartered Accountant (FCA), Institute of Chartered Accountants of India, 1997
Certified Public Accountant since 2008,
Enrolled Agent, admitted to practice before the IRS since 2011,
FINRA securities licenses (65 - 1/11/20; 63 – 10/8/19; 7 – 9/21/19; 6 – 7/30/11)
Chartered Global & Management Accountant since 2012
Texas Health & Life Insurance since 2019,

Business background:

MyTimeEquity, LLC : Co-Founder, Managing Partner/Member, investment adviser representative, (09/03/2021 - Present); (Texas registration 01/04/2022), Plano, Texas

Saxony Securities, Inc., registered representative (04/01/2022 – 03/21/2023) St. Louis, MO
Saxony Capital Management, investment adviser representative (04/01/2022- 03/21/2023),
St. Louis, MO

Emerson Equity LLC – Registered Representative (11/02/2019 – 04/01/2022); Plano, Texas
Emerson Advisors, LLC - Investment Advisor Representative, (01/11/2020 – 04/01/2022)
Plano, TX

Legacy Wealth Planners, LLC - President & CEO, Wealth Advisor – (09/2019 – Present), Plano, TX

Sudhir Pai CPA, PLLC (Co-Founder), CPA firm, (08/2011 to Present)

Suma Monde Kapital Partners, LLC, Managing partner (10/2021-present), Plano, TX
Suma Monde Kapital Partners, GP LP, an owner, (10/2021), Plano, TX

SurelyNow, LLC [CEO], Retirement Planning & Real Estate consulting. (05/2021 – Present), McKinney, TX

Global Value Add, Inc., CEO, (01/2009 to present), Plano, TX.

My Startup CFO LLC, Managing Partner & Director, Head of Operations (Ta),(03/2017 – 07/2021), Plano, TX

Coastal Equities, Inc. registered representative of the broker dealer, (employed 09/2019, registered 10/04/2019-11/05/2019), Plano, TX

Exoridior Inc. – was a tech company in which Mr. Pai was a partner. (November 2013 – May 2014;The entity closed in 2016.) Bangalore, India

H.D. Vest Investment Services, registered representative (employed May/ registered 08/01/2011 to 06/24/2013), Frisco, TX.

Hanna Global Solutions Inc., Director of Tax & Compliance (01/2010 – 12/2013), Plano, TX

Infosys Technologies Limited, a 12 billion dollars technology services firm CFO & Vice President - North Americas – (09/1997 to 07/2007) Fremont, CA

International Business & Service Need, Chief Operating Officer, (08/2007 – 07/2008), Moline, IL

See also: Other business activities in Item 4

Licenses and qualifications noted above clarified:

Certified Public Accountant (CPA)

A CPA must have a bachelor's degree (4-year) that includes a minimum number of accounting and business studies credits in addition to 150 credit hours of higher education, and complete 1-2 years of verified accounting-related experience/ work after passing the Uniform CPA examination.

Chartered Global & Management Accountant [CGMA®]

“The CGMA designation is the most widely held management accounting designation in the world.” The qualifications are established by two of the world’s leading accounting organizations — the American Institute of CPAs (AICPA®) and the Chartered Institute of Management Accountants (CIMA®).

Enrolled Agent, admitted to practice before the IRS

“An enrolled agent is a person who has earned the privilege of representing taxpayers before the Internal Revenue Service by either passing a three-part comprehensive IRS test covering individual and business tax returns, or through experience as a former IRS employee. Enrolled agent status is the highest credential the IRS awards. Individuals who obtain this ...status must adhere to ethical standards and complete 72 hours of continuing education courses every three years. Enrolled agents, like attorneys and certified public accountants (CPAs), have unlimited practice rights. This means they are unrestricted as to which taxpayers they can represent, what types of tax matters they can handle, and which IRS offices they can represent clients before. Learn more about enrolled agents in [Treasury Department Circular 230](#) (PDF).

Fellow Chartered Accountant (FCA), Institute of Chartered Accountants of India, 1997

The designation “FCA” is used for those persons who have achieved a high degree of professional experience, a person who has held a professional certificate for more than 5 years.

Item 3. Disciplinary Information.

The Investment Adviser Public Disclosure site states, regarding Sudhir Pai:

Is this Investment Adviser Representative currently suspended with any jurisdiction? **No.**

Are there events disclosed about this Investment Adviser Representative? **No.**

Are there events disclosed about this broker? **No.**

Mr. Pai has not been subject to any criminal or civil actions, administrative proceedings, self-regulatory organization (SRO) proceedings, revocations, or suspensions.

Item 4. Other Business Activities.

As noted above in Part 2A, whenever Mr. Pai recommends a service to advisory clients, and he himself will be the paid provider of that recommended service, such a situation inherently creates a conflict of interest. As a fiduciary he must recommend only those services and products that are in a client’s own best interest, free of any influence of possible gain for himself. The firm addresses this possible conflict of interest by disclosing it to the firm’s clients. The services that Mr. Pai may recommend include brokerage and insurance products, as well as tax services.

The Investment Manager for the above funds is SuMa Monde Kapital Partners, LLC; the general partner is SuMa Monde Kapital Partners GP, LP,[4512 Legacy Drive, Suite 100, Plano, TX 75024]. It is an investment-related business. Mr. Pai is one of its owners and a managing partner since February 2022. Currently it requires approximately 0-8 hours per month, either during or after business hours.

MyTimeEquity, LLC does not solicit its clients to invest in any of these funds, nor does MyTimeEquity, LLC act as an adviser to the 3 funds. These funds are ones that Mr. Pai has developed.

SuMa Monde Kapital Partners, LLC,[investment related / real estate asset buying and mgmt.], general partner, 50 hours/ year, none during trading hrs. / Oct 2021 - Present

Mr. Pai is also the Manager of Supriya & Sudhir Pai Family Office, LLC, a family investment venture limited to his family's assets only, started September 8. 2021. No advisory client of MyTimeEquity, LLC is involved in this business venture.

Other affiliations:

One source for Portfolio models for MyTimeEquity is MyStockDna [website www.mystockdna.com] Mr. Sudhir Holla and Mr. Sudhir Pai are partners in MyStockDna.

Mr. Pai is the CEO of **Global Value Add, Inc.** of Plano, Texas, formed in November 2019. Global Value Add, Inc is a tax preparation and accounting firm.

Guruganesh, Ltd – is Mr. Pai's family trust.

Mr. Pai is a co-founder and partner of **Sudhir Pai CPA, PLLC**, a CPA firm (August 2011 – Present). Mr. Pai is also a partner in the CPA firm, **P&G Associates, PLLC**. He does not have signatory power over clients' investments or other accounts.

Sainaga LLC is Mr. Pai's LLC holding office building and rental homes.

Mr. Pai is the CEO of **SurelyNow, LLC** (2008 – Present), an insurance firm based in McKinney, Texas (since May 2021). Mr. Pai is licensed to sell insurance products.

SuMa Monde Kapital Partners, LLC and SuMa Monde Kapital Partners GP, LP are one business and one structure and will include the RE Syndication Private Placement fund, a 506c RE syndication private placement not yet in operation. [Investment related: real estate buying and management]; may require 2 hours/ **??? day wk yr** during trading hrs

If an advisory client of MyTimeEquity LLC seeks the services of any of Mr. Pai's related entities, or if Mr. Pai recommends any such service to a client of MyTimeEquity, there is a risk for a conflict of interest due to the payment Mr. Pai can receive for such services. It is Mr. Pai's fiduciary duty to recommend and/ or perform only such services for a client that are in the client's own best interest.

Mr. Pai is a passive partner in the following business enterprises, all of them with their address in Plano, unless otherwise stated:

My Startup CFO LLC : (March 2017 – July 2021; passive partner since September 2019), not investment related, no work hours required, a CFO entity.

Imytaxfiler, LLC, Pmytaxfiler, LLC, and GVA Franchise, LLC : (active : December 2017-July 2021; no ownership, passive partner since September 2019), not investment related, no work hours required, tax business entities. These are now essentially shell companies, their assets sold in July 2021, to be dissolved in the future.

GVA Franchise, LLC founder, /0 ownership: 0 hrs during trading / 10 hours per month, from December 2017-July 2021

Kubair, Corp; employee, Burlingame, CA, bookkeeping sales,: 0 hours during trading hours; January 2018 – December 2020.

Kuvera, LLC, Partner : 51% owner / Conservation easements, 0 hours/year (0 during trading hrs), from December of 2016 to the present.

P & G Associates, PLLC 51% owner / **20** hours/ year = 0 during trading hrs / Dec 2013 - Present

Suma Monde Kapital Partners, LLC, investment related / real estate asset buying and mgmt., 2 hours >> 50 hrs / yr = 0 during trading hrs. / Oct 2021 - Present

Item 5. Additional Compensation.

As described in Part 2A, Mr. Pai can, as the registered representative of a broker-dealer, receive 12(b)-1 fees from the administrative fees a client pays to a mutual fund when that client purchases a mutual fund. If Mr. Pai recommends the purchase of mutual funds to his advisory clients, that recommendation creates a risk for a conflict of interest, due to the 12(b)-1 fees that he can realize. We address this potential conflict of interest by disclosing it here. Per the California regulator, we add the following disclosure here: ***Clients have the option to purchase through other brokers or agents that are not affiliated with MyTimeEquity those investment products that MyTimeEquity recommends.***

Item 6. Supervision.

Mr. Sudhir Pai, the Managing Member for MyTimeEquity, and its sole adviser representative, is for the most part his own supervisor. He maintains on file in the firm's offices reports of his proprietary trading activities and the formulation of his recommendations for the regulator to review at will. Mr. Holla, the firm's chief technology officer, will review Mr. Pai's investment transactions as one of the firm's measures against any insider trading or other forbidden market activities. Clients and potential clients can contact Mr. Pai at the number shown in the 2B header, i.e. (469) 702-1272.

Item 7. State Registration requirements

Mr. Sudhir Pai **has not been involved in one** of the events under this heading:

- (1.) An award or otherwise being *found* liable in an arbitration claim alleging damages in excess of \$2,500, or
- (2.) An award or otherwise being *found* liable in a civil, *self-regulatory organization*, or administrative *proceeding involving*
 - (a) an investment or an *investment-related* business or activity;
 - (b) fraud, false statement(s), or omissions;

- (c) theft, embezzlement, or other wrongful taking of property;
- (d) bribery, forgery, counterfeiting, or extortion; or
- (e) dishonest, unfair, or unethical practices.

B. Mr. Pai has not been the subject of a bankruptcy petition.

MyTimeEquity, LLC

4512 Legacy Drive, Unit 100
Plano, Texas 75024
[crd # 316917]

Telephone : (469) 702-1272

[April 22, 2022]

Part 2B: The Brochure Supplement : Here we provide information about advisory personnel on whom you rely for investment advice. We must provide this supervised person's supplement to you, our client initially at or before the time when *that* specific supervised person begins to provide you with advisory services.

Item 1. Cover Page.

This brochure supplement provides information about Sudhir Holla that supplements the MyTimeEquity, LLC brochure. You should have received a copy of that brochure. Please contact Mr. Pai, or other office personnel (Priya, Sharath, Rachel), if you did not receive MyTimeEquity, LLC's brochure or if you have any questions about the contents of this supplement. Additional information about Mr. S. Holla is available on the SEC's website at www.adviserinfo.sec.gov.

Mr. Sudhir Holla
Born 19
CRD # 7355950

Item 2. Educational Background and Business Experience

Education & Licensing:

Mr. Holla's educational history is:

- 1992 - Electrical Engineering, India
- 1994 - MBA, IIM, India

Business background:

MyTimeEquity, LLC : Co-Founder, Managing Partner/Member, investment adviser representative, (09/03/2021 - Present); Plano, Texas. Mr. Sudhir Holla is a 50% owner and the Chief Technology Officer, creating/ selecting sources of algorithmic investment programs for Mr. Pai's consideration and use as he deems suitable for advisory clients.

April 22, 2022: Mr. Holla applied to be registered as an investment adviser representative of MyTimeEquity, LLC.

Mr. Holla is also the owner of Koalla Technologies LLC in Frisco, Texas, a technology firm that develops algorithms for trading in the market, requiring 4-8 hours per day, during or after market hours.

Previously he has been employed at:

- Accenture in Dallas, Texas, as a manager [02/2016 – 10/2020]
- UGAM in Dallas, Texas, as a Senior Vice President [08/2012 – 01/2016]
- Infosys in Dallas, Texas, as a Vice President [11/1999-08/2012]

Item 3. Disciplinary Information.

Mr. Holla has not been subject to any criminal or civil actions, administrative proceedings, self-regulatory organization (SRO) proceedings, revocations, or suspensions.

Item 4. Other Business Activities.

Mr. Holla is also the owner of Koalla Technologies LLC in Frisco, Texas, a technology firm that develops algorithms for trading in the market, requiring 4-8 hours per day, during or after market hours. One source for Portfolio models for MyTimeEquity is MyStockDna [website www.mystockdna.com] Mr. Sudhir Holla and Mr. Sudhir Pai are partners in MyStockDna.

Item 5. Additional Compensation.

Mr. Holla does not receive any additional compensation from another investment adviser or any broker dealer.

Item 6. Supervision.

Mr. Sudhir Pai, the Managing Member for MyTimeEquity, and an adviser representative, is Mr. Holla's supervisor. He maintains on file in the firm's offices reports of Mr. Holla's proprietary trading activities and the formulation of his recommendations for the regulator to review at will. Mr. Holla, the firm's chief technology officer, will review Mr. Pai's investment transactions as one of the firm's measures against any insider trading or other forbidden market activities. Clients and potential clients can contact Mr. Pai at the number shown in the 2B header, i.e. (469) 702-1272.

Item 7. State Registration requirements

Mr. Sudhir Holla **has not been involved in one** of the events under this heading:

- (1.) An award or otherwise being *found* liable in an arbitration claim alleging damages in excess of \$2,500, or
- (2.) An award or otherwise being *found* liable in a civil, *self-regulatory organization*, or administrative *proceeding involving*

- (a) an investment or an *investment-related* business or activity;
- (b) fraud, false statement(s), or omissions;
- (c) theft, embezzlement, or other wrongful taking of property;
- (d) bribery, forgery, counterfeiting, or extortion; or
- (e) dishonest, unfair, or unethical practices.

B. Mr. Holla has not been the subject of a bankruptcy petition.