



Public Advisors LLC  
530 Broadway, 4th Floor  
New York, NY 10012  
212-401-6946  
[www.public.com](http://www.public.com)

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

**March 29, 2026**

### **Item 1: Cover Page**

This brochure (“Brochure”) provides information about the qualifications and business practices of Public Advisors LLC (“Public Advisors”), an investment adviser registered with the United States Securities and Exchange Commission (“SEC”). Registration does not imply a certain level of skill or training but only indicates that Public Advisors has registered its business with state and federal regulatory authorities, including the SEC. The information in this Brochure has not been approved or verified by the SEC or by any state securities authority.

If you have any questions about the contents of this Brochure, please contact us at [support@public.com](mailto:support@public.com). Additional information about Public Advisors is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) and on our website at [www.public.com](http://www.public.com).

Throughout this Brochure, Public Advisors is also referred to as “we” or “us.” The term “Client” or “you” refers to an individual with whom Public Advisors has established an advisory relationship.

## Item 2: Summary of Material Changes

This is our annual update to the Public Advisors Form ADV Part 2A Brochure. Our prior annual updating amendment to this Brochure was on January, 31, 2025. Below please find a description of the Brochure revisions we made since this last annual update:

- On October 1, 2025, we updated our Brochure to describe our new Direct Indexing and Tax Loss Harvesting products, and to make the Brochure clearer and easier to read.
- On November 17, 2025, we updated our Brochure to describe our new Generated Assets interactive analysis tool and Generated Assets Accounts. We also updated the Brochure to reflect changes to our Tax Loss Harvesting product.
- On December 9, 2025, we updated our Brochure to reflect our new address of 530 Broadway, 4th Floor, New York, NY 10012.
- On March 29, 2026, we updated our Brochure to reflect the fact that Generated Assets Accounts can hold both ETF's and stocks. We also added a section on ETF Risks in Item 8.

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## Item 4: Advisory Business

### Description of Our Firm

Public Advisors LLC (“Public Advisors”), a Delaware limited liability company, is an SEC-registered investment adviser that maintains its principal office at 530 Broadway, 4th Floor, New York, NY 10012.

Public Advisors was formed in January 2022 and is a wholly-owned subsidiary of Public Holdings, Inc. (“Public Holdings”). Open to the Public Investing, Inc. (“Public Investing” or “Broker”), an introducing broker-dealer registered with FINRA and the SEC, is also a wholly-owned subsidiary of Public Holdings. Clients who wish to engage Public Advisors for investment advisory services must open a brokerage account with Public Investing. For more information about the relationship between Public Advisors and Public Investing, please see [Item 10: Other Financial Industry Activities and Affiliations](#) and [Item 12: Brokerage Practice](#). Apex Clearing Corporation (“Apex” or “Custodian”) is an unaffiliated broker-dealer registered with FINRA and the SEC that provides: (a) clearing, settlement, and trade execution services for Public Investing; and (b) custody services to Public Advisors.

### Summary of Advisory Services

Public Advisors provides discretionary investment advisory services to Clients exclusively over the internet. You can access Public Advisors’ services through our online interactive website available at [www.public.com](http://www.public.com) and the Public mobile application (collectively, the “Public Platform”). Public Advisors exclusively utilizes software to provide our automated advisory and portfolio management services.

Prospective Clients wishing to engage our services must first enter into a written investment advisory agreement with Public Advisors (the “Investment Advisory Agreement”). Pursuant to this Investment Advisory Agreement, you give Public Advisors discretionary authority to manage your assets in one or more Client accounts (“Client Account” or “Account”). Each Client Account is a brokerage account that you open at Public Investing, our affiliated broker-dealer, pursuant to a separate brokerage agreement (“Brokerage Agreement”) between you and Public Investing.

### Treasury Accounts

You may open a “Treasury Account” with Public Advisors, which is a portfolio of U.S. Treasuries with a range of maturities. Treasury Accounts are managed by Public Advisors on a discretionary basis. The Treasury Account is designed to preserve capital, generate predictable income with minimal risk, and take advantage of the tax benefits of U.S. Treasuries. Each Treasury Account has an assigned Treasury “ladder” or set of Treasury durations, where each “rung” in the ladder is one duration. Each rung has an assigned “weight” or target percentage allocation. You can choose from a selection of ladders developed by Public Advisors or can configure your own Treasury ladder. After selecting a Treasury ladder, you can select how maturity and coupon payments are reinvested, if at all.

### Direct Index Accounts

You may also open a Direct Index Account (“DI Account”) with Public Advisors, which enables you to directly invest in the individual stocks that comprise a particular benchmark market index (“Benchmark Index”). The portfolio of your DI Account (“DI Portfolio”) aims to track the overall performance of this Benchmark Index while permitting you to make certain customizations, such as: (a) holding only a portion of the Benchmark Index’s stocks rather than all of its stocks; (b) excluding specific stocks found in the Benchmark Index from your DI Portfolio; (c) weighing the stocks in your DI Portfolio differently than the

Benchmark Index; and (d) choosing the frequency in which your DI Portfolio is rebalanced. When opening a DI Account, you can elect to track one of the various Benchmark Indexes that Public Advisors has licensed from third-party index providers.

After your DI Account has been opened, Public Advisors will begin applying automated tax loss harvesting (“TLH”) for your Account. Specifically, this means that each time your DI Portfolio is rebalanced, we will apply TLH to sell and buy stocks in a tax-efficient manner while keeping your DI Portfolio’s overall performance aligned within a reasonable tracking error to the Benchmark Index. Similarly, every time the DI Account experiences a cash inflow or outflow, Public Advisors will apply rebalancing and TLH to sell and purchase stocks in a manner that optimally balances between tracking error and tax savings. In order to opt out of TLH altogether, you must set your DI Account’s rebalancing schedule to “None (Buy and Hold).”

### Generated Assets Accounts

Generated Assets (“GenA”) is an interactive analysis tool powered by artificial intelligence (“AI”) and offered by Public Advisors. GenA’s underlying AI technology, models, and agents enable the tool to: (a) interpret natural language inputs that you type into its interface; and (b) generate natural language outputs by analyzing a wide range of market data sources licensed by Public Advisors or its affiliates, or that is otherwise publicly available online. Through GenA’s interface, you can describe objective criteria and characteristics regarding the securities, companies, industries, and/or weights of your desired custom index. GenA’s AI agents then will then research, filter, and compile an index of stocks and ETF’s matching your criteria and characteristics (“GA Index”). Along with this list of securities, GenA will describe how your original natural language prompt was interpreted, the screening process that the tool applied, and how each security on the list aligns with your original criteria. Once you have constructed your custom GA Index, you can also use the tool to display the historical performance and metrics regarding this index and compare such performance against a standard benchmark index such as the S&P 500®. Finally, you can further refine your GA Index’s composition and weights by continuing to type prompts and requests into GenA’s natural language interface.

Please note that any output from GenA, including your GA Index and its historical performance, is for your informational and educational purposes only. Such output is not, and should not be construed as, individualized investment advice or recommendations by Public Advisors or any of our affiliates.

If you elect to directly invest in the individual securities that comprise your GA Index, then you may do so by opening a Generated Assets Account (“GA Account”) with Public Advisors. As part of account opening, you can elect the frequency in which the securities in your GA Account (“GA Portfolio”) are rebalanced. When rebalancing occurs, Public Advisors will buy and sell positions in your GA Portfolio in a way that aims to track your GA Index’s composition and weights. Similarly, every time your GA Account experiences a cash inflow or outflow, Public Advisors will buy or sell securities in a manner that keeps your GA Portfolio aligned with your GA Index’s target allocations.

### **Tailored Services and Investment Restrictions**

#### Treasury Accounts

With respect to each Treasury Account, Public Advisors will evaluate whether your investment time horizon (“Treasury Time Horizon”) is consistent with the Treasury ladder you have elected. If not, we will recommend that you revisit your Treasury ladder selection, invest in an alternative product that may be more appropriate, or deposit your funds in a high-yield savings account. You have the obligation to ensure that your Treasury Time Horizon information is and remains correct.

## DI Accounts

With respect to each DI Account, Public Advisors forms your investor profile (“Investor Profile”) by asking you to complete an investor questionnaire regarding your financial goals, risk tolerance, and investment time horizon. Based on your responses, we will assess whether a Direct Indexing strategy *in general* aligns with your Investor Profile. If it does not, then you have the option of: (1) indicating that you understand the risks and electing to proceed with opening your DI Account; or (2) selecting an alternative product offered by Public Advisors or Public Investing that may be more suitable. You have the obligation to ensure that your Investor Profile information is and remains correct.

You may not place orders to purchase or sell securities on a self-directed basis within your DI Account, but you will be permitted to impose reasonable restrictions on the management of your DI Portfolio through the customization options described above, including the exclusion of specific stocks from your DI Portfolio.

## GA Accounts

With respect to each GA Account, Public Advisors forms your Investor Profile by asking you to complete an investor questionnaire regarding your financial goals, risk tolerance, and investment time horizon. Based on your responses, we will assess whether a Generated Assets strategy *in general* aligns with your Investor Profile. If it does not, then you have the option of: (1) indicating that you understand the risks and electing to proceed with opening your GA Account; or (2) selecting an alternative product offered by Public Advisors or Public Investing that may be more suitable. You have the obligation to ensure that your Investor Profile information is and remains correct.

You may not place orders to purchase or sell securities on a self-directed basis within your GA Account, but you will be permitted to change the frequency of rebalancing.

## **Wrap Fee Program**

Public Advisors does not offer a wrap fee program.

Generally speaking, a “wrap fee” is a fee charged by an investment adviser that covers both the investment advisory services provided by the adviser and the costs for executing transactions on the customer’s account. When a customer participates in a wrap fee program and their investment adviser effects trades for the customer’s account, the customer is not charged separately for those transactions.

Public Advisors charges you a fee for providing our investment advisory services for your Account. This fee does **not** cover the costs of executing transactions and other brokerage services for your Account. For example, Public Investing is the broker for each Account and charges you a markup or markdown on each Treasury buy or sell order, respectively, for your Treasury Account. Other fees may apply for Public Investing’s services, including wire transfer fees, paper statement fees, or inactivity fees. For a full list of the fees charged by Public Investing, see [public.com/disclosures/fee-schedule](https://public.com/disclosures/fee-schedule).

## **Services Limited to Specific Types of Investments**

Public Advisors generally limits its investment advice to securities, including Treasuries, stocks, and ETF’s.

## **Assets Under Management**

As of March 28, 2026, Public Advisors managed \$25,350,835 in Client assets on a discretionary basis.

## Item 5: Fees and Compensation

Public Advisors is compensated for our advisory services by charging Clients an annual advisory fee (“Management Fee”) that is tied to the market value of their Account. See below for the Management Fee rates for Treasury Accounts and DI Accounts.

The Management Fee is charged on a monthly basis. Fees are calculated daily by multiplying the Account’s closing balance by the applicable rates, and dividing by 365 (or 366 in a leap year). Fees for a calendar month are the sum of the daily fee calculated during that month.

The Management Fee rates are subject to change upon prior written notice to Clients. In addition, Public Advisors reserves the right, in its sole discretion, to negotiate, reduce or waive the Management Fee for certain Accounts for any period of time, as determined solely by Public Advisors. In addition, we may reduce or waive our Management Fees for the Accounts of some Clients without notice to, or fee adjustment for, other Clients.

### Treasury Accounts

Public Advisors charges each Client an annual Management Fee that is tied to the market value of their Treasury Account. We apply different rates to different portions of your Treasury Account:

Tier	Treasury Account Portfolio Value	Annual Management Fee
1	The first \$25,000	0.29%
2	The next \$75,000, up to \$100,000	0.24%
3	The next \$900,000, up to \$1,000,000	0.19%
4	The next \$4 million, up to \$5,000,000	0.14%
5	Assets over \$5,000,000	0.09%

For example, a Treasury Account that holds up to \$25,000 in Treasuries and cash will be charged the Tier 1 fee. A Treasury Account with an aggregate value between \$25,001 and \$100,000 will be charged the Tier 1 fee on the first \$25,000 in assets and the Tier 2 fee on the remainder of the assets. A Treasury Account with an aggregate value between \$100,001 and \$1 million will be charged the Tier 1 fee on the first \$25,000 in assets, the Tier 2 fee on the next \$75,000, and the Tier 3 fee on the remainder of the assets. And so on.

### DI Accounts

Public Advisors charges each Client an annual Management Fee that is tied to the market value of their DI Account. This annual Management Fee is 0.19%.

### GA Accounts

Public Advisors charges each Client an annual Management Fee that is tied to the market value of their GA Account. This annual Management Fee is 0.49%.

### Payment of Fees

Management Fees are billed monthly in arrears and fee payments are generally withdrawn from your Account by Custodian by the end of the following month. Custodian will then forward these fees to Public Advisors. All fees deducted will be clearly noted on account statements that you receive from Custodian.

Please note that you share in the responsibility to verify the accuracy of fee calculations, and you should review your account statements closely.

By signing the Investment Advisory Agreement with Public Advisors, the Brokerage Agreement with Public Investing, and the Customer Account Agreement with Custodian, you authorize Custodian to withdraw the Management Fee from your Account and remit that payment to Public Advisors. In the event there is insufficient cash in your Account to cover the fees or any debit balance, we will select and sell securities held in your Account to generate the requisite cash. As with any other transaction on your Account, you are responsible for any tax liabilities or losses resulting from such sales.

### **Brokerage and Other Fees**

The Management Fee described above is payment for the investment advisory services provided by Public Advisors. This fee does not cover trade execution and other brokerage services provided by Public Investing, our affiliated broker-dealer. You are responsible for paying any fees assessed by Public Investing. For example, when Treasuries are bought or sold for your Treasury Account, Public Investing will charge you either a markup or markdown on such transactions. You may incur additional brokerage service fees imposed by Public Investing for your Treasury or DI Account, including wire transfer fees, paper statement fees, and inactivity fees. A full list of the fees charged by Public Investing is available at <https://public.com/disclosures/fee-schedule>.

For more on the brokerage practices and fees charged by Public Investing, see [Item 12: Brokerage Practice](#).

### **Prepayment of Fees**

Public Advisors does not accept prepayment of fees.

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

Public Advisors does not receive or charge performance-based fees and does participate in side-by-side management.

## Item 7: Types of Clients

The Clients served by Public Advisors are primarily individuals. We also allow certain business entities, such as trusts, corporations, and partnerships, to open Accounts. Our investment advisory services are generally not available to Clients located outside of the United States and its territories, though we make exceptions for active military personnel stationed abroad.

Because we offer our investment advisory services exclusively online via the Public Platform, and use software automation to power our services, we are able to reach a broad audience of retail investors while at the same requiring lower account minimums and fees than typically offered by traditional investment advisers who provide personalized services through in-person or telephone meetings. Investors evaluating Public Advisors' advisory services should understand that our relationship with Clients will not involve direct conversations with investment personnel, which means each Client must acknowledge their ability and willingness to conduct their relationship with Public Advisors primarily on an electronic basis. Public Advisors does make representatives available to Clients for account servicing and other customer support matters. Our services, therefore, may not be appropriate for investors who prefer interacting in-person with a financial advisor.

### **Requirements: General**

As mentioned above, an Account is a brokerage account managed on your behalf by Public Advisors. Public Investing is an introducing broker to Custodian, which carries Public Investing's accounts on a fully-disclosed basis. To open an Account with Public Advisors, you must first agree to a Brokerage Agreement with Public Investing and a Customer Account Agreement with Custodian.

In order for Public Advisors to provide our investment advisory services, you must have access to the Public Platform on a mobile device or over the internet, and an email address for which you can accept electronic communications from Public Advisors and our affiliates. All Public Advisors communications, materials, and documents will be delivered electronically. You consent and agree to maintain the ability to receive and access these documents through electronic channels as a requirement in order to open and maintain an Account through Public Advisors.

### **Requirements: Treasury Accounts**

The minimum amount required to open and maintain a Treasury Account is \$1,000. Once you have met this account minimum, Public Advisors will manage your Treasury Account regardless of the total account value, until your Treasury Account is closed or all assets are withdrawn.

### **Requirements: DI Account**

The minimum amount required to open a DI Account is \$1,000. Note that this \$1,000 initial investment may only enable your DI Account to track some, but not all, of a particular Benchmark Index's stocks. The total number of index positions you can track will depend on your initial investment amount and the particular Benchmark Index's size and composition.

### **Requirements: GA Account**

The minimum amount required to open a GA Account is \$1,000. Certain GA Accounts may require a higher initial investment amount depending on the desired GA Index's size and composition.

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

### Treasury Account Investment Strategy

The Treasury Account is designed to preserve capital, generate predictable income with very little risk, and take advantage of the tax benefits of investing in US Treasuries.

The Treasury Account holds a portfolio of US Treasuries with a range of maturities. The U.S. government guarantees that, if you hold a Treasury to maturity, you will receive your principal and full yield. Treasuries are highly liquid and can be sold in the secondary market before maturity, though if you sell prior to maturity you may not receive the full yield and there is some risk of loss of principal. Interest paid on Treasuries is exempt from state and local taxes.

When opening a Treasury Account, you assign a Treasury “ladder” to your Account. A ladder is a set of Treasury durations, where each “rung” in the ladder is one duration. Each rung has an assigned “weight” or target percentage allocation. There are 10 Treasury durations that can be included in a ladder, ranging from 3 months to 30 years. The total length of a Treasury ladder is the length of the longest duration Treasury included in that ladder; if you invest in a “3 Year Ladder” or “5 Year Ladder,” that means the longest duration Treasury in your ladder is three or five years, respectively. The proceeds from maturity and interest payments on the Treasuries in your Treasury Account can be reinvested in new Treasuries or remain as cash.

While we will attempt to purchase Treasuries for your Account that match your chosen ladder strategy, some variance may occur. Public Advisors has discretion to purchase or sell Treasuries in order to best meet your goals. See [Item 16: Investment Discretion](#) for a description of Public Advisors’ discretionary investment authority.

We purchase and sell Treasury in increments of \$100 par value. From time to time, there may be cash in your Treasury Account that is insufficient to purchase the next appropriate Treasury security in the minimum increment, and that cash will remain in your Treasury Account as cash. That cash will not earn yield or interest, and will drag down the overall yield of your Treasury Account.

At any time, you may close your Treasury Account, or make partial or full withdrawal from a Treasury Account. These actions will prompt Public Advisors to sell Treasuries in your Treasury Account. We may also sell Treasuries in the event there is insufficient cash in your Treasury Account to cover our Management Fee. As with any other transaction on your Treasury Account, you are responsible for any tax liabilities resulting from such sales.

### DI Account Investment Strategy

The DI Account enables you to invest directly in the individual stocks that comprise a specific Benchmark Index. Your DI Portfolio aims to track the overall performance of this Benchmark Index while permitting you to make certain customizations, such as: (a) holding only a portion of the Benchmark Index’s stocks rather than all of its stocks; (b) excluding specific stocks found in the Benchmark Index from your DI Portfolio; (c) weighing the stocks in your DI Portfolio differently than the Benchmark Index; and (d) choosing the frequency in which your DI Portfolio is rebalanced. While a DI Portfolio aims to replicate the Benchmark Index’s overall performance within a reasonable tracking error, such customizations may cause the composition and weights of your DI Portfolio to differ from those of your Benchmark Index, especially over time.

After your DI Account has been opened, Public Advisors will begin applying automated TLH (described further below) for your Account. Specifically, this means that each time your DI Portfolio is rebalanced, we will apply TLH to sell and buy stocks in a tax-efficient manner while keeping your DI Portfolio's overall performance aligned, within a reasonable tracking error, to your Benchmark Index. Similarly, every time your DI Account experiences a cash inflow or outflow, we will apply rebalancing and TLH to sell and purchase stocks in a manner that optimally balances between tracking error and tax savings. Any dividends from your DI Portfolio are automatically reinvested back into your DI Account — such reinvestment constitutes a cash inflow and will trigger rebalancing and TLH. Rebalancing and TLH may cause the holdings and weights of your DI Portfolio to deviate from those of your Benchmark Index, especially over time.

When opening your DI Account, you can elect to track one of the various Benchmark Indexes that Public Advisors has licensed from third-party index providers. The minimum investment to open a DI Account is \$1,000. Note that this \$1,000 initial investment may only enable your DI Account to track some, but not all, of a particular Benchmark Index's stocks. The total number of index positions you can track will depend on your initial investment amount and the particular Benchmark Index's size and composition.

A DI Account has a target cash allocation of 0.25% of its DI Portfolio's market value. This is to ensure there are enough funds in the Account to cover our Management Fee.

### **Tax Loss Harvesting Strategy**

After your DI Account has been opened, Public Advisors will begin applying automated TLH for this Account. Specifically, Public Advisors will apply TLH each time your DI Portfolio is rebalanced and each time there is cash inflow or outflow to your DI Account. TLH is a technique designed to reduce your tax liability while maintaining alignment between your DI Portfolio's overall performance and your Benchmark Index's overall performance. TLH does this by looking for opportunities to sell existing positions at a loss in order to accelerate the realization of this capital loss, and then investing the sales proceeds in one or more alternate stocks from your Benchmark Index. Such alternate stocks allow your DI Portfolio to still replicate the overall performance of your Benchmark Index within a reasonable tracking error. In turn, the realized loss from selling the existing positions can be applied to offset taxes due on your other gains and income, potentially lowering your overall tax liability.

To apply TLH, Public Advisors employs technology that uses mathematical optimization to balance two objectives: (1) minimizing tracking error relative to the Benchmark Index's overall performance; and (2) maximizing after-tax benefits of harvested losses ("Tax Alpha"). Tax Alpha is achieved by selling stocks that have declined in value to "harvest" such losses, while tracking error is reduced by purchasing correlated replacement stocks that are expected to allow your DI Portfolio to continue maintaining alignment with your Benchmark Index's overall performance.

While a DI Portfolio aims to track the overall performance of the Benchmark Index within a reasonable tracking error, TLH may cause the specific composition and weights of your DI Portfolio to deviate from those of your Benchmark Index, especially over time. Furthermore, to create flexibility for TLH, your DI Portfolio may hold fewer stocks than the full Benchmark Index at any given time.

In order to opt out of TLH altogether for your DI Account, you must set their DI Account's rebalancing schedule to "None (Buy and Hold)."

## GA Account Investment Strategy

GenA is an interactive analysis tool powered by AI and offered by Public Advisors. GenA's underlying AI technology, models, and agents enable the tool to: (a) interpret natural language inputs that you type into its interface; and (b) generate natural language outputs by analyzing a wide range of market data sources licensed by Public Advisors or its affiliates, or that is otherwise publicly available online. Through GenA's interface, you can describe objective criteria and characteristics regarding the securities, companies, industries, and/or weights of your desired custom index. GenA's AI agents then will then research, filter, and compile an index of stocks and ETF's matching your criteria, known as your "GA Index." Along with this list of securities, GenA will describe how your original natural language prompt was interpreted, the screening process that the tool applied, and how each security on the list aligns with your original criteria. Once you have constructed your custom GA Index, you can also use the tool to display the historical performance and metrics regarding this index and compare such performance against a standard benchmark index such as the S&P 500®. Finally, you can further refine your GA Index's composition and weights by continuing to type prompts and requests into GenA's natural language interface.

Please note that any output from GenA, including your GA Index and its historical performance, is for your informational and educational purposes only. Such output is not, and should not be construed as, individualized investment advice or recommendations by Public Advisors or any of our affiliates. Furthermore, we do not guarantee the accuracy, completeness, relevance, or timeliness of such output and will not be responsible for any losses that may result from your reliance on such information. You are solely responsible for any investment decisions you make based on GenA's output. Before investing in your GA Index, please carefully consider whether it is suitable for you based on your investment objectives, risk tolerance, and other individual factors.

If you elect to directly invest in the individual securities that comprise your GA Index, then you may do so by opening a GA Account with Public Advisors. As part of account opening, you can elect the frequency in which the securities in your GA Account, known as your "GA Portfolio," are rebalanced. When rebalancing occurs, Public Advisors will buy and sell positions in your GA Portfolio in a way that aims to track your GA Index's composition and weights. Similarly, every time your GA Account experiences a cash inflow or outflow, Public Advisors will buy or sell securities in a manner that keeps your GA Portfolio aligned with your GA Index's target allocations.

### Material Risks

Public Advisors does not guarantee any particular level of Account performance, or that an Account will be profitable over time. Past performance is no guarantee of future results. Any investment in securities involves the possibility of financial loss that Clients should be prepared to bear.

Below, we have listed some of the general risks involved when you invest with Public Advisors. This list is not exhaustive.

- **Market Risk.** The market value securities such as stocks, ETF's, and Treasuries — just like any other security or asset class — can fluctuate for a variety of reasons beyond the control of Public Advisors. These reasons may include, but are not limited to, changes in the macroeconomic environment, shifts in market sentiment, unexpected economic developments, fluctuations in interest rates, regulatory changes, and political, demographic, or social events within the United States or abroad.

- **Advisory Risk.** There is no guarantee that the investment decisions or judgments made by Public Advisors regarding specific securities or asset classes will achieve the intended result. Public Advisors and its representatives are not liable for any losses, except in cases where such losses result from a breach of Public Advisors' fiduciary duty.
- **Software Risk.** Public Advisors provides its investment advisory services exclusively through software. As such, we take great care in designing, developing, and thoroughly testing our software before it is deployed to manage actual Accounts and assets. Public Advisors regularly monitors our software's performance after deployment. Despite this process, there may be instances where our software does not perform exactly as intended or as described on our website, mobile app, marketing materials, or other disclosures. For example, there may be times when certain Accounts do not experience TLH or undergo rebalancing to the appropriate asset allocation for extended periods due to errors in our software's deployment. Public Advisors is committed to actively monitoring, identifying, and addressing any issues where our software fails to perform as expected or disclosed.

Furthermore, Public Advisors or our Clients may also experience issues such as computer equipment failure, loss of internet access, viruses, or other disruptions that could impact access to our software-based investment advisory services.

- **Cybersecurity Risk.** There is a risk that a cybersecurity incident results in a third party gaining unauthorized access to your Account, the misappropriation of sensitive Account information, the theft of assets held in your Account, the disruption of the usual functionality of your Account, or the corruption of Account data. We have a reasonably designed cybersecurity program that reduces these risks, however there is no guarantee that we will be able to prevent all cyber attacks.
- **Liquidity and Valuation Risk.** High volatility and/or the lack of deep and active liquid markets for a security may prevent a Client from selling their securities at all, or at an advantageous time or price because Public Advisors' executing broker-dealer may have difficulty finding a buyer and may be forced to sell at a significant discount to market value. While Public Advisors values securities in Accounts based on the best commercial data available, there may be occasions when inaccurate data is received or used, potentially impacting security valuations, transaction execution, or the Management Fees a Client pays to Public Advisors.
- **Regulatory Risk.** Investment performance may directly or indirectly be affected by government legislation or regulation, which may include, but is not limited to: changes in investment adviser or securities trading regulation; changes in the U.S. government's guarantee of ultimate payment of principal and interest on certain government securities; and changes in the retirement legislation and tax code that could affect assets, interest income, income characterization and/or tax reporting obligations.
- **Inflation, Currency, and Interest Rate Risks.** Security prices and portfolio returns are likely to fluctuate in response to changes in inflation and interest rates. Inflation erodes the value of future dollars, potentially reducing the purchasing power of an investor's future interest payments and principal. Additionally, inflation typically leads to higher interest rates, which can cause the value of many fixed income investments to decline. Furthermore, the value of U.S. dollar-denominated assets primarily managed by Public Advisors may be impacted by currency devaluations, which could affect a Client's purchasing power.

- **Credit Risk.** Public Advisors cannot control, and Clients are exposed to the risk that, financial intermediaries or security issuers may experience adverse economic consequences that may include impaired credit ratings, default, bankruptcy or insolvency, any of which may affect portfolio values or management. This risk applies to assets held with any broker-dealer, notwithstanding asset segregation and insurance requirements that are beneficial to broker-dealer clients generally. In addition, exchange trading venues or trade settlement and clearing intermediaries could experience adverse events that may temporarily or permanently limit trading or adversely affect the value of Client securities. Finally, any issuer of securities may experience a credit event that could impair or erase the value of the issuer's securities held by a Client.
- **Fractional Shares Risk**
  - Transferability. Public Advisors can purchase and sell securities in increments smaller than the typical lot size ("Fractional Securities"). Fractional Securities trades are executed by Public Investing and Custodian in a riskless principal capacity. The Automated Customer Account Transfer System ("ACATS"), which is the automated system that facilitates the transfer of customer account assets between brokers, does not support Fractional Securities. If you wish to transfer your Account or specific security positions to another broker, your Fractional Securities must be liquidated and the cash proceeds may be transferred, which may result in tax consequences, investment gain or loss, and the assessment of commission charges.
  - Liquidity. Fractional Securities may be difficult to sell. As of the date of this Firm Brochure, there is only one counterparty in the market for fractional bond transactions, Moment Markets. Fractional Security orders may take longer to execute than whole security orders. The pricing of a Fractional Security may also be higher than the price that would otherwise be received for a whole security.
- **ETF Risks**
  - Tracking Error. ETF performance may not exactly match the performance of the index or market benchmark that the ETF is designed to track because: (1) the ETF will incur expenses and transaction costs not incurred by any applicable index or market benchmark; (2) certain securities comprising the index or market benchmark tracked by the ETF may, from time to time, temporarily be unavailable; and (3) supply and demand in the market for either the ETF and/or for the securities held by the ETF may cause the ETF shares to trade at a premium or discount to the actual net asset value of the securities owned by the ETF.
  - Fees and Expenses. Clients should be aware that to the extent they invest in ETF securities they will pay two levels of advisory compensation – advisory fees charged by Public Advisors plus any management fees charged by the issuer of the ETF. This scenario may cause a higher advisory cost (and potentially lower investment returns) than if a Client purchased the ETF directly. An ETF typically includes embedded expenses that may reduce the fund's net asset value, and therefore directly affect the fund's performance and indirectly affect a Client's portfolio performance or an index benchmark comparison. Expenses of the fund may include ETF management fees, custodian fees, brokerage commissions, and legal and accounting fees. ETF expenses may change from time to time at the sole discretion of the ETF issuer.
- **Treasury Account Risks**

- Concentration Risk. A Treasury Account only holds U.S. Treasuries. There is a risk associated with having too much invested in a particular asset class or security. If a Client has a high allocation to a particular asset class or classes, to the extent those asset classes underperform relative to other assets in the market, the Client's overall performance will be adversely affected.
  - Market Risk. The value of Treasuries in the secondary market can fluctuate, and if sold before maturity, may be worth more or less than their original cost. Fixed income securities are subject to various risks, including changes in interest rates, credit quality, market valuations, liquidity, prepayments, early redemption, corporate events, tax implications, and other factors.
  - Credit Risk. While Treasuries in a Treasury Account are backed by the full faith and credit of the United States, unforeseen circumstances, such as reaching a legislative "debt ceiling," could prevent the timely payment of interest or principal.
  - Inflation Risk. Treasury payments are fixed and consequently are subject to risk that inflation over time will diminish the purchasing power of those future payments. Furthermore, the market value of Treasuries fluctuate in response to a wide array of factors, the most important being the prevailing market interest rate. When interest rates go up, Treasury prices go down, and vice versa. The market prices of longer duration Treasuries are more sensitive to interest rate changes — and carry more interest rate risk — than shorter duration Treasuries. Because of this interest rate risk, you may not realize your full yield if you sell early, and there is some risk to principal.
  - Frequent Trading. As discussed above, Public Advisors buys and sells Treasuries for your Account when you deposit funds into your Treasury Account, withdraw cash from your Account, and, if you have elected to reinvest maturity or coupon payments, when those payments hit your Account. Public Investing charges a markup on Treasury purchases and markdown on Treasury sales, which will erode your yield. Therefore, you should not trade frequently in and out of your Treasury Account.
- **Direct Index Account Risks**
    - Equity Securities Risk. The prices of equity securities rise and fall daily. These price movements may result from factors affecting individual companies, industries, or the securities market as a whole. Individual companies may report poor results or be negatively affected by industry and/or economic trends and developments. The prices of securities issued by such companies may suffer a decline in response. In addition, the equity market tends to move in cycles which may cause stock prices to fall over short or extended periods of time.
    - Benchmark Index Risk. Benchmark Indexes that target a smaller universe of securities, such as a specific region or market sector, are generally subject to greater market volatility, as well as to the specific risks associated with that sector, region, or other focus. When the composition of a Benchmark Index is in a concentrated number of securities, a decline in the value of these securities would cause the associated DI Portfolio to decline to a greater degree than that of a less concentrated portfolio. Benchmark Indexes that invest a large percentage of assets in only one industry sector (or in only a few sectors) are more vulnerable to price fluctuation than Benchmark Indexes that diversify among a broad range of sectors.

- Composition Differences and Tracking Errors. You can elect certain customizations for your DI Portfolio, such as: (a) holding only a portion of the Benchmark Index's stocks rather than all of its stocks; (b) excluding specific stocks found in the Benchmark Index from your DI Portfolio; (c) weighing the stocks in your DI Portfolio differently than the Benchmark Index; and (d) choosing the frequency in which your DI Portfolio is rebalanced. While a DI Portfolio aims to replicate the Benchmark Index's overall performance within a reasonable tracking error, such customizations may cause the composition and weights of your DI Portfolio to deviate from those of the Benchmark Index, especially over time. Such customizations may also result in differences between the performance of your DI Portfolio versus the performance of your Benchmark Index, including possible underperformance of your DI Portfolio.

Each time your DI Portfolio is rebalanced, Public Advisors applies TLH to sell and buy stocks in a tax-efficient manner while keeping your DI Portfolio's overall performance aligned to the Benchmark Index, within a reasonable tracking error. Similarly, every time your DI Account experiences a cash inflow or outflow, we will apply rebalancing and automated TLH to sell and purchase stocks in a manner that optimally balances between tracking error and tax savings. Rebalancing and TLH may cause composition differences and tracking errors between your DI Portfolio and Benchmark Index, especially over time. Furthermore, to create flexibility for TLH, your DI Portfolio may hold fewer stocks than the full Benchmark Index at any given time.

You should be prepared for potential deviations in composition and performance between your DI Portfolio and Benchmark Index, and understand that Public Advisors does not guarantee alignment in either composition or performance.

- **Tax Loss Harvesting Risks**

- You should confer with your personal tax adviser regarding the tax consequences of investing with Public Advisors and engaging in TLH, based on your personal circumstances. You and your adviser are responsible for how the transactions in your DI Account are reported to the Internal Revenue Service ("IRS") or any other taxing authority. Public Advisors assumes no responsibility to you for the tax consequences of any transaction, including any capital gains and/or wash sales that may result from TLH.
- Public Advisors' TLH services are not intended as tax advice, and Public Advisors does not represent in any manner that our TLH services or any other strategy will result in any particular tax consequence. The tax consequences of TLH and other strategies are complex and may be subject to challenge by the IRS. TLH was not developed to be used by, and it cannot be used by, any investor to avoid penalties or interest.
- When Public Advisors replaces stocks with alternate stocks from the Benchmark Index as part of our TLH strategy, such replacement investments are selected based on the expectation that their performance will replicate the performance of the original stock, within a reasonable tracking error. However, such an outcome is not guaranteed. Expected returns characteristics are no guarantee of actual performance. The performance of the new stocks purchased through TLH may be better or worse than the performance of the securities that are sold for TLH purposes.
- The effectiveness of TLH to reduce your tax liability will depend on your entire tax and investment profile, including purchases and dispositions in your (or your spouse's) accounts outside of Public Advisors and the type of investments (e.g., taxable or nontaxable) or holding

period (e.g., short-term or long-term). Clients who exclude specific stocks from their DI Portfolio may also influence the effectiveness of our TLH strategy by limiting the number of replacement stocks we can purchase on your behalf. TLH will cause, in varying degrees, differences in performance of your DI Portfolio from the performance of your Benchmark Index. The utilization of losses harvested through TLH will depend upon the recognition of capital gains in the same or a future tax period, and in addition may be subject to limitations under applicable tax laws, e.g., if there are insufficient realized gains in the tax period, the use of harvested losses is limited to a \$3,000 deduction against ordinary income and distributions.

- A “wash sale” occurs when a taxpayer sells a security at a loss and then purchases the same security or a substantially identical security over a period of 61 days (the 30 days before the sale, the day of the sale, and the 30 days after the sale). If a wash sale occurs, the IRS may not allow the loss to offset gains or income for current tax year reporting purposes. Wash sales can occur even if the securities are sold and then bought in different investment accounts. For more information on the wash sale rule, please [read IRS Publication 550](#).

Public Advisors’ TLH software will attempt to monitor the transactions within your specific DI Account in order to avoid creating wash sales from other transactions within this particular DI Account. However, our TLH software lacks visibility into the holdings and transactions of your other investment accounts, including but not limited to your *other DI Accounts* with Public Advisors (to the extent you have opened more than one), your other brokerage accounts with Public Investing, and your other investment accounts outside of Public Advisors or Public Investing. You are responsible for monitoring these other investment accounts (and, if applicable, any investment accounts of your spouse) to ensure that transactions in the same security or a substantially identical security do not create a wash sale. If a wash sale is created under those circumstances, Public Advisors may not be able to provide notice of such wash sale in advance of your receipt of IRS Form 1099.

- Public Advisors’ TLH software is designed to monitor holdings within a specific DI Account to determine whether there are unrealized losses that can be harvested. However, our software lacks visibility into the holdings from any of the Client’s other investment accounts, including other accounts with Public Advisors and Public Investing as well as other external accounts. Holdings and transactions outside of the specific DI Account may affect whether a loss is successfully harvested and, if so, whether that loss is usable by the Client in the most efficient manner.
- Under certain circumstances, there is a chance that trading attributed to TLH may create capital gains and/or wash sales. In addition, TLH may produce losses which may not be offset by sufficient gains in your DI Account.
- **Artificial Intelligence Risks.** Public Advisors’ GenA interactive analysis tool employs AI technology, models, and agents in order to: (a) interpret natural language inputs that you type into its interface; and (b) generate natural language outputs by analyzing a wide range of market data sources. GenA relies upon new and rapidly-evolving AI technology, which entails certain risks, including the ones below:
  - **Data Risk.** GenA’s AI models and agents collect and analyze large amounts of market data from external public sources and/or third-party data providers. Due to the automated nature of this data gathering and the fact that much of this data comes from third-party sources, it is inevitable that not all desired or relevant data will be available to, or processed by, GenA at

all times. Furthermore, users should be aware that the data analyzed by GenA could be subject to inaccuracies or errors, and could otherwise be inadequate, flawed, or delayed.

- Hallucination Risk. The AI models used by GenA have the potential to generate incorrect or misleading outputs, often referred to as “hallucinations.” Hallucinations occur when AI models produce results that do not accurately reflect real-world data or circumstances, leading to potentially flawed responses. Specifically, AI may generate responses that seem plausible but are factually incorrect, incomplete, or unrelated to the original query, potentially leading to misunderstandings or misinformed decisions by users. And when faced with unfamiliar or complex questions, AI may provide hallucinated answers that are speculative or irrelevant, rather than accurately addressing the inquiry.
- Dependence on User-Provided Inputs. The accuracy of GenA’s output is critically dependent on the accuracy and completeness of the user’s input, including the criteria and characteristics of the user’s desired customer index. Incomplete or inaccurate descriptions can lead to flawed output. Furthermore, GenA may not fully interpret the qualitative nuances, emotional context, or unstated assumptions behind a user’s request, leading to oversimplification or misinterpretation of inputs. The user is responsible for ensuring that all relevant context is explicitly provided to GenA.
- Bias Risk. AI models learn from vast datasets that may contain embedded historical biases or inaccuracies. Such biases could affect the accuracy, fairness, and quality of GenA’s outputs and outcomes.
- Technology Risk. System errors, software bugs, algorithmic flaws, or data feed disruptions could lead to delayed, incomplete, or inaccurate outputs by GenA. Furthermore, GenA may become temporarily unavailable due to system outages, denial of service attacks, or other disruptions affecting business continuity.
- Over-Reliance Risk. Despite clear disclaimers to the contrary, users may mistakenly treat AI-generated output by GenA as individualized investment advice or recommendations tailored to their needs. Such misinterpretations and overreliance can lead to unintended and potentially harmful financial outcomes.

- **Hypothetical Performance Risks**

- Once a user has constructed their GA Index using the GenA interactive analysis tool, they can also use the tool to determine and display how such an index would have performed historically. There are certain risks involved with relying on such historical performance and metrics. Returns displayed by this functionality for a user’s custom index are hypothetical in nature, do not reflect actual investment results, and are not guarantees of future results. If the user had actually invested in the securities comprising their custom index during the historical timeframe, their actual results may be different from the results presented by GenA based on, for example, the timing of their trades. Hypothetical results have inherent limitations and should not be relied upon without understanding the underlying assumptions and risks.
- For comparison purposes, GenA may display performance of a benchmark index such as the S&P 500® over the same time period. Benchmark indices are unmanaged, it is not possible to invest directly in a benchmark index, and returns for benchmark indices do not account for fees.

## Item 9: Disciplinary Information

Neither Public Advisors nor any member of its management has been involved in a material criminal or civil action in a domestic, foreign or military jurisdiction, an administrative enforcement action, or self-regulatory organization proceeding that would reflect poorly upon Public Advisor's advisory business or the integrity of Public Advisors.

Public Investing, the affiliated broker-dealer of Public Advisors, does have some disciplinary history. For details, please refer to Public Investing's BrokerCheck report:

<https://brokercheck.finra.org/firm/summary/127818>.

## Item 10: Other Financial Industry Activities and Affiliations

Public Advisors is a wholly-owned subsidiary of Public Holdings. Public Holdings is also the parent company of Public Investing, a FINRA and SEC-registered broker-dealer.

All Accounts managed by Public Advisors are brokerage accounts maintained at Public Investing. Pursuant to the Investment Advisory Agreement between you and Public Advisors, you give Public Advisors discretionary authority to direct Public Investing to buy and sell securities for your Account. Public Investing has no discretion with respect to your Account.

Public Investing is an introducing broker to Custodian, which carries Public Investing's accounts on a fully-disclosed basis. Custodian is a FINRA and SEC-registered clearing broker-dealer and is not affiliated with Public Advisors, Public Investing, or Public Holdings. Client trades accepted by Public Investing are relayed to Custodian, which executes and clears those trades through various market centers. In addition to executing and clearing Client trades, Custodian also provides custody services for the securities and cash in Public Advisors' Accounts. Prior to or concurrently with opening an Account with Public Advisors, you must enter into a Brokerage Agreement with Public Investing and a separate Customer Account Agreement with Custodian.

The relationship between Public Advisors and Public Investing gives rise to certain conflicts of interest. These conflicts are discussed in [Item 12: Brokerage Practices](#) below.

### **Relationships between Management and Other Firms**

The Chief Executive Officer of Public Advisors, Stephen Sikes, is the Chief Executive Officer and a registered representative of Public Investing. He does not receive any transaction-based compensation or commissions from Public Investing, but his affiliation with Public Investing creates a conflict of interest between Public Advisors and Public Investing.

Additionally, Mr. Sikes is the Co-Founder and Managing Partner of a venture capital firm, Socially Financed Management, LLC ("Socially Financed"). Socially Financed is an SEC exempt reporting advisor that solely manages venture capital funds. Venture capital investments are not currently offered by either Public Advisors or Public Investing.

## **Item 11: Code of Ethics, Participation or Interest in Client Transactions & Personal Trading**

Public Advisors has adopted a written Code of Ethics (“Code of Ethics”) designed to ensure that we meet our fiduciary obligations to our Clients, act ethically and in a professional manner, and detect and prevent any violations of securities laws and rules. Our Code of Ethics establishes standards of conduct for all Public Advisors employees, including officers, directors, employees, certain contractors and others, and is consistent with the code of ethics requirements of Rule 204A-1 under the Investment Advisers Act of 1940, as amended.

We periodically review and amend our Code of Ethics to ensure it remains current and require all employees to annually attest to their understanding of, and adherence to, the Code of Ethics. A copy of our Code of Ethics is available upon request.

Our employees may buy or sell securities recommended by Public Advisors for their personal accounts. However, trades of such securities are unlikely (individually or in the aggregate) to materially impact the market price of such securities and information about securities trades is unlikely to constitute material non-public information. Furthermore, in order to monitor conflicts of interest, Public Advisors monitors the non-discretionary securities transactions in the personal accounts of employees designated as “Access Persons” to determine whether there have been any improper use of Client trading information. An “Access Person” is defined as an employee who has access to non-public information regarding Clients’ purchase or sale of securities, is involved in making securities recommendations to Clients, or who has access to such recommendations that are non-public.

## Item 12: Brokerage Practices

In [Item 10](#) above, we explain that all Client Accounts are brokerage accounts with Public Investing, and describe the respective roles of Public Investing and Custodian in providing brokerage services for such Accounts. Here, we describe the conflicts of interest that may exist between Public Advisors and our Client due to the requirement that all Client Accounts be maintained at Public Investing. You do not have the option of opening an Account with another broker-dealer. Public Advisors and Public Investing are affiliates, share an office, and many of the employees who participate in Public Investing's brokerage business also are involved in the business of Public Advisors.

You should understand that the appointment of Public Investing as the sole broker for your Account may result in some costs to you. For example, other broker-dealers may offer different services, products, capabilities, execution, or fees, which you should consider when deciding whether to become a Public Advisors client. That said, we believe that the selection of Public Investing as the broker for your Account is in your best interest based on the scope, quality, and cost of the services provided by Public Investing when considered holistically, together with the benefits of the seamless integration between Public Advisors and Public Investing.

### Public Investing Fees

The Management Fee charged by Public Advisors to Clients covers our investment advisory services. However, this fee does not cover trade execution and other brokerage services provided by Public Investing. You are responsible for paying any fees assessed by Public Investing. For example, when Treasuries are bought or sold for your Treasury Account, Public Investing will charge you either a markup or markdown on such transactions. You may incur additional brokerage service fees imposed by Public Investing for your Treasury, DI, or GA Account, including wire transfer fees, paper statement fees, and inactivity fees. You may also incur regulatory trading fees, which are fees charged by regulatory agencies or exchanges, and passed onto you by Public Investing. A full list of the fees charged by Public Investing is available at <https://public.com/disclosures/fee-schedule>. These fees are not included in the Management Fee charged by Public Advisors and will be charged to your Account directly by Public Investing and reflected on account statements provided by Custodian.

The charging of transaction and brokerage service fees by Public Investing, an affiliate of Public Advisors, creates a conflict of interest because Public Advisors has discretionary authority to trade securities — including whether and when to trade, and the amount and specific securities to be bought or sold — for your Account.

### Cash Balances

Any funds deposited in a Treasury Account that is not sufficient to purchase the next appropriate Treasury for your ladder will remain as cash in your Account. We also maintain a cash buffer in your DI Account and GA Account at all times to ensure sufficient funds for payment of Management Fees. You do not earn interest on any cash in your Account, but our affiliate Public Investing does.

### Payment for Order Flow

We have discretionary authority to trade equity securities for your DI Account or GA Account. Custodian, the clearing broker for such transactions, earns revenue from such trade activity. Custodian shares a portion of this revenue with Public Investing, our affiliated broker-dealer. This is a conflict of interest because such payments to Public Investing are proportional to the volume of our trading.

## **Securities Lending Program**

If your DI Account or GA Account is enrolled in the “Apex Clearing Corporation Fully Paid Securities Lending Program,” a stock lending program offered by Custodian, then Custodian may earn interest by loaning out stock held in your DI Account or GA Account to other investors and institutions. Custodian shares a portion of this interest with you, but also with Public Investing, our affiliated broker-dealer.

## **Moment Markets**

Treasuries are executed in a broker-to-broker market. When Public Advisors instructs Public Investing to buy Treasuries for your Treasury Account, Public Investing relays that order to Custodian. Custodian buys that amount of Treasuries to Public Investing on a riskless principal basis. The price charged by Custodian to Public Investing is the market price Custodian paid for your Treasuries, plus Custodian’s markup. Public Investing then sells those Treasuries to you, the Client, on a riskless principal basis. Public Investing applies a markup to that final leg of the transaction. When Public Advisors sells Treasuries for your Account, the opposite chain of transactions takes place.

Custodian uses Moment Markets as its fixed income liquidity provider. The secondary bond market, including the Treasury market, is very fragmented. For whole Treasury buys and sells, Moment Markets operates an order matching engine that looks across several different fixed income liquidity providers and helps Custodian route the order to buy or sell whole Treasuries to the best market. For fractional Treasury buys and sells, Moment Markets acts as the counterparty and market maker; Custodian buys and sells all fractional Treasuries from Moment Markets. Custodian does not have another provider of liquidity for fractional Treasuries. Most of the Treasuries bought and sold by Public Advisors for your Treasury Account are fractional Treasuries. Moment Markets is an essential service provider of Custodian when it comes to executing Treasury orders. Although Custodian (and not Public Advisors) chose Moment Markets as its fractional Treasuries liquidity provider, Custodian’s use of Moment Markets indirectly creates a conflict of interest because the Chief Executive Officer of Public Advisors and certain other employees and affiliates of Public Advisors are investors in Moment Technologies, the parent company of Moment Markets.

## **Trade Execution**

Public Advisors mitigates conflicts as described above by seeking best execution for Client transactions. Best execution refers to the best qualitative execution for the transaction and not merely the lowest cost. In selecting a broker-dealer, or other intermediary, Public Advisors will consider such factors that in good faith and judgment it deems reasonable under the circumstances. Public Advisors has evaluated Public Investing and has a reasonable belief that Public Investing will provide its clients with a blend of execution services, low fees, and a level of professionalism that are consistent with Public Advisors’ best execution obligations.

For example, Public Investing has an Execution Committee that is responsible for overseeing trade execution, consistent with its Charter, as well as the FINRA rules which require that Public Investing regularly and rigorously review its order handling practices and execution quality. Public Investing seeks to obtain the best overall execution for securities transactions for Clients, and Public Investing has a supervisory system reasonably designed to obtain the best overall execution for Clients and review the execution quality it has achieved for Client securities orders. That said, there can be no assurance that Clients will obtain the best possible price on each and every securities order. For example, there are structural reasons — most importantly limited liquidity providers, more difficulty in seeing what liquidity is available across multiple pools, and limited availability of market data — that makes it more difficult to execute fixed income orders than orders for NYSE- or NASDAQ-listed equity securities. These structural

limitations are more acute for fractional Treasuries, where there is currently only one liquidity provider in the market.

Notwithstanding these limitations, Public Investing will always seek the best execution reasonably available in the market for all securities orders.

### **Order Aggregation**

For transactions involving equity securities, Public Advisors seeks to place aggregated orders involving multiple Accounts trading in the same securities. In conducting these transactions, no Client is favored over any other Client and each Client who participates in an aggregated transaction will participate at the average share price for transactions in the aggregated order. However, aggregation is not always possible depending on factors such as the underlying securities and the timing of Public Advisors' investment decisions and operations. Consequently, some transactions of Clients are executed on an individual basis. If a Client's order is not aggregated, then the Client may receive disparate prices from trading at different times during the day. Additionally, the process of aggregating orders may delay the execution timing for a particular order. If order execution is delayed, then the Client may also receive disparate prices from trading at different times during the day.

### **Soft Dollar Practices**

Public Advisors has no soft-dollar arrangements and does not receive soft-dollar credits from brokers with whom client portfolio trades are executed.

### **Brokerage for Client Referrals**

Public Advisors does not work with broker-dealers other than its affiliate, Public Investing. Public Advisors does not receive client referrals from Public Investing.

### **Directed Brokerage**

Clients of Public Advisors are required to maintain Accounts managed by Public Advisors at Public Investing. Public Advisors does not permit clients to direct brokerage transactions to a broker-dealer of their choosing.

### **Trade Execution Errors**

Public Investing's systems have been reasonably designed to minimize potential trading errors when executing orders for Client Accounts. However, no policy or procedure developed can possibly anticipate every potential error, including operational and settlement errors. Public Advisors endeavors to identify and document such errors at the earliest possible time, correcting them as soon as practicable, including but not limited to reallocation where appropriate.

### **Fractional Securities**

The securities in your Account may be either whole securities or fractional securities. Fractional securities are typically unmarketable and illiquid if held outside your Account with Public Investing. Whole securities can be transferred out of your Account to another broker via the Automated Customer Account Transfer System ("ACATS") system, but fractional securities cannot. If you decide to transfer your Account to another brokerage, Custodian will liquidate your fractional securities and then transfer the resulting cash to your new brokerage.

## Item 13: Review of Accounts

Clients should be aware that their individual Accounts are generally not actively monitored by investment advisory personnel. Public Advisors' investment tools are designed to provide Clients with continuous access to Account and performance information through the Public Platform. Clients may log on to the Public Platform at any time to review their Account holdings, performance, and activity, and to access their Account documents such as account statements and trade confirmations. Clients also receive periodic e-mail communications with information about their Accounts and links to Account statements.

In general, Public Advisors does not actively monitor individual Treasury Accounts. We also do not automatically rebalance the holdings in such Accounts. However, if you deposit cash into your Treasury Account, Public Advisors will use that cash to purchase Treasuries in amounts designed to bring the overall holdings of your Treasury Account closer to your target allocation. If you sell Treasuries in your Treasury Account, Public Advisors will sell holdings with an eye to bringing the remaining holdings in your Treasury Account closer to the target allocation. And finally, if you have elected to re-invest maturity and coupon payments on Treasuries in your account, Public Advisors will also use those proceeds to purchase Treasuries to get you closer to your target allocation. Public Advisors assumes no responsibility to our Clients for any tax consequences of any transaction, including any capital gains that may result from the sale of Treasuries.

In general, Public Advisors does not actively monitor individual DI Accounts or GA Accounts. However, we do allow you to select the frequency in which your DI Portfolio or GA Portfolio is rebalanced.

- Each time your DI Portfolio is rebalanced, we exercise our discretionary authority and apply TLH to sell and buy stocks in a tax-efficient manner while keeping your DI Portfolio's overall performance aligned, within a reasonable tracking error, to the Benchmark Index. Similarly, every time your DI Account experiences a cash inflow or outflow, we will apply rebalancing and TLH to sell and purchase stocks in a manner that optimally balances between tracking error and tax savings.
- Each time your GA Portfolio is rebalanced, we exercise our discretionary authority to buy and sell positions in your GA Portfolio in a way that aims to track your GA Index's composition and weights as closely as possible. Similarly, every time your GA Account experiences a cash inflow or outflow, we will buy or sell securities in a manner that keeps your GA Portfolio as closely aligned as possible with your GA Index's target allocations.

Public Advisors assumes no responsibility to our Clients for any tax consequences of any transaction, including any capital gains that may result from the rebalancing of Accounts.

On an annual basis, we ask our Clients to confirm their financial profile information. In addition, we periodically remind our Clients to login to the Public Platform to review their financial profile information. These notifications and confirmations include a link to the section of the Public Platform where the Client's financial profile information is saved and can be updated by the Client. You have an obligation to ensure that their financial profile information is accurate and up-to-date.

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

Public Advisors from time-to-time runs advertising and promotional campaigns to increase interest in its services. These campaigns include compensating Client and non-Client third parties (collectively, "Promoters"), including podcasters, influencers, or publications, to create and share material promoting Public Advisors. Compensation may take various forms, including a flat fee, a fee per referral, reduced advisory fees, or non-cash compensation like paid access to company events. These arrangements may create an incentive for a Promoter to make a referral to Public Advisors when, absent the referral bonus, they would not have made that referral. Compensation is paid and appropriate disclosures are made in compliance with Rule 206(4)-1 under the Investment Advisers Act of 1940, as amended, to the extent required by applicable law. Public Advisors does not charge clients a fee or additional cost in connection with these marketing activities.

In addition, certain Public Advisors personnel may be eligible for variable compensation based on individual performance or growth driven by their respective teams to Public Holdings and its affiliates. This compensation is not specific to Public Advisors and does not depend on driving growth to any particular entity. Conflicts of interest exist as such personnel have an incentive to bring assets onto Public Advisors or our affiliates.

## Item 15: Custody

Custodian is responsible for custody of your Account's cash balances and securities positions. Custodian also provides settlement and clearing services with respect to trades booked to your Account. Accordingly, the assets in your Account are **not** physically maintained by Public Advisors or Public Investing.

Our affiliated broker-dealer, Public Investing, serves as the broker of record for your Account. Public Investing processes Client checks made payable to Custodian and deposits them into Client Accounts.

Clients are provided with transaction confirmations and account statements by Custodian on at least a quarterly basis. Public Advisors does not create or send account statements for Clients, and will not serve as the sole recipient of any Client account statement. You are urged to carefully review and compare your account statements with the information on your Account available by logging into the Public Platform. You should contact Public Advisors directly if you believe that there may be an error with any information appearing on your statement, including the application of Management Fees.

## Item 16: Investment Discretion

Under the terms of the Investment Advisory Agreement, Public Advisors assumes discretionary trading and investment authority over assets in your Account. This means that we can buy and sell investments on your behalf when we determine it is appropriate to do so, without requiring your specific authorization for each transaction. We do not have the authority to remove funds or securities from your Account and may only request the withdrawal of our Management Fees from Custodian.

### **Treasury Accounts**

Public Advisors manages Treasury Accounts on a discretionary basis. A Treasury Account is a portfolio of U.S. Treasury securities. You have discretion with respect to the initial implementation of your Treasury Account. When opening an account, you can choose from different Treasury “ladders” developed by Public Advisors or can configure your own Treasury ladder. After selecting a Treasury ladder, you can select how maturity and coupon payments are reinvested, if at all.

Once the Treasury ladder has been selected, Public Advisors will exercise our discretionary authority to purchase Treasuries consistent with the overall portfolio allocation chosen by you. If you elect to reinvest maturity and/or interest payments, we will apply our discretionary authority to use those proceeds to purchase new Treasuries such that your chosen weighting of Treasury durations is maintained. If you request to withdraw funds from your Treasury Account, we use our discretion to choose which holdings to sell, with the goal that the remaining holdings in your Treasury Account reflect your chosen allocation. Outside of these scenarios, we do not use our discretionary authority to trade Treasuries for your Treasury Account.

### **DI Accounts**

Public Advisors manages your DI Account on a discretionary basis. When opening a DI Account, you can choose to track one of the various Benchmark Indexes that we have licensed from third-party index providers. We do not provide recommendations on which Benchmark Index you should select. Instead, we provide descriptions of each Benchmark Index to help you choose the Benchmark Index that suits the purpose of your investment and your preferences.

Once you have selected your Benchmark Index, you can elect certain customizations and restrictions for your DI Account, including: (a) holding only a portion of the Benchmark Index’s stocks rather than all of its stocks; (b) excluding specific stocks found in the Benchmark Index from your DI Portfolio; (c) weighing the stocks in your DI Portfolio differently than the Benchmark Index; and (d) choosing the frequency in which your DI Portfolio is rebalanced. You can elect to turn off TLH for your DI Account if you set your rebalancing schedule to “None (Buy and Hold).” These customizations and elections may also be updated after your DI Account has been created.

After the DI Account has been created, Public Advisors will exercise our discretionary authority to trade: (a) in response to cash inflow or outflow to the DI Account; (b) to rebalance your DI Portfolio based on your selected rebalancing schedule; (c) to execute TLH; (d) to otherwise, keep in a tax-efficient manner, the DI Portfolio aligned, within a reasonable tracking error, to your Benchmark Index’s overall performance and with your allocations, customizations, and restrictions; and/or (e) if necessary, to sell stocks to free up cash to pay for the Management Fee.

### **GA Accounts**

Public Advisors manages your GA Account on a discretionary basis.

A GA Account allows you to track the custom GA Index you have constructed through the GenA interactive analysis tool. Any output from GenA, including your GA Index, is generated at your direction and is for informational purposes only. Such output should not be considered individualized investment advice or recommendations from Public Advisors. Furthermore, we do not guarantee the accuracy, completeness, relevance, or timeliness of such output and will not be responsible for any losses that may result from your reliance on such information. You are solely responsible for deciding whether to invest in the GA Index you have constructed. Before investing in your GA Index, please carefully consider whether it is suitable for you based on your investment objectives, risk tolerance, and other individual factors.

If you elect to invest in the securities comprising your GA Index, you may do so by opening a GA Account. During account enrollment, you can choose the frequency in which your GA Portfolio is rebalanced. Rebalancing frequency may also be updated after your GA Account has been created.

After the GA Account has been created, Public Advisors will exercise our discretionary authority to trade: (a) in response to cash inflow or outflow to your GA Account; (b) to rebalance your GA Portfolio based on your selected rebalancing schedule; and/or (c) if necessary, to sell securities to free up cash to pay for the Management Fee.

## **Item 17: Voting Client Securities (Proxy Voting)**

Clients may periodically receive “proxies” or other similar solicitations sent directly from Custodian or a transfer agent. Regardless of whether Public Advisors receives a duplicate copy of these or any other correspondence relating to, e.g., the voting of Client securities, class action litigation, corporate actions, etc., Public Advisors does not forward them to our Clients.

Public Advisors does not vote proxies on behalf of our Clients, nor do we offer guidance on how to vote proxies. In addition, Public Advisors does not offer guidance on any claims or potential claims in bankruptcy proceedings, class action securities litigation, or any other litigation or proceeding relating to securities held at any time in an Account including, without limitation, filing proofs of claim or other documents related to such proceedings. Public Advisors does not investigate, initiate, supervise, or monitor class actions or other litigation involving Client assets.

Clients maintain exclusive responsibility for directing the manner in which proxies are voted, as well as making all other elections relative to mergers, acquisitions, tender offers, or other legal matters or events pertaining to their holdings. Clients should consider contacting the issuer or its legal counsel for any specific questions regarding a proxy solicitation or corporate action.

## **Item 18: Financial Information**

Public Advisors does not require or solicit prepayment of advisory fees and is therefore not required to include a balance sheet for its most recent fiscal year. Public Advisors also does not have any financial condition that is reasonably likely to impair its ability to meet contractual commitments to our Clients.