

TRADESPRO LLC | A Trading & Investments Firm

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CRD#336150



TRADESPRO
A Trading & Investments Firm

Firm Brochure - Form ADV Part 2A

Release Date: December 31st, 2025

Firm Registration Date: July 29th, 2025

TRADESPRO LLC Firm Brochure – Form ADV Part 2A

This Brochure provides information about the qualifications and business practices of TRADESPRO LLC. If you have any questions about the contents of this Brochure, please contact us at (972) 338 – 5294 or by email at: ClientServices@Tradespro.net

The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or by any state securities authority.

Additional information about TRADESPRO LLC is available on the SEC's website at www.adviserinfo.sec.gov. TRADESPRO LLC's CRD Number is **336150**.

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

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Version Date: **12/31/2025**

Item 2: Material Changes

This brochure was originally filed in connection with TRADESPRO LLC's registration as an investment adviser, which became effective on July 29, 2025. This version reflects the firm's annual updating amendment as of December 31, 2025.

Since the firm's initial brochure filing, the material changes reflected in this brochure are limited to updates to the firm's principal office address and assets under management. Other non-material clarifications and formatting revisions may also have been made throughout the brochure.

Clients will receive a summary of any future material changes to this brochure within 120 days of the end of TRADESPRO LLC's fiscal year, together with either a copy of the updated brochure or an offer to provide the updated brochure upon request.

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Item 4: Advisory Business

A. Description of the Advisory Firm

TRADESPRO LLC is a Texas-based limited liability company formed on March 6, 2025. As of December 31, 2025, TRADESPRO LLC is a registered investment advisory firm, with its principal place of business located at 3939 Belt Line Rd, Suite 575 A, Addison, TX 75001. TRADESPRO is wholly owned by Robert Hudak and is now actively providing advisory services.

WHO WE SERVE

TradesPro LLC provides investment advisory services to individual clients, including high-net-worth individuals, retirement accounts, and small businesses. The firm does not provide investment advisory services to pooled investment vehicles, private funds, or model portfolios.

Institutional and Professional Engagements

TradesPro LLC may offer project-based consulting services to other investment professionals, institutional firms, or corporate entities. These services may include technical analysis, trade structuring, financial modeling, volatility research, or other forms of strategic insight.

Such engagements are limited in scope, do not involve portfolio management or discretionary authority, and are not treated as investment advisory relationships. TradesPro's role in these cases is to provide independent analysis or technical input—not to serve as the investment adviser to the entity or to any pooled assets they may manage.

B. Types of Advisory Services

Financial Planning Services

1. Client Intake and Onboarding – Consultation Services

TradesPro LLC provides client intake and onboarding services to ensure a thorough understanding of each client's financial situation, goals, and suitability for advisory services. This process includes an initial consultation, where the client's objectives and the firm's services are discussed, as well as a comprehensive onboarding phase involving account setup, document collection, and coordination with custodians or other third parties. These services establish the foundation for a successful advisory relationship.

- i) Initial Consultation: The initial consultation is a billable formal advisory meeting designed to discuss client objectives, assess suitability, and introduce the firm's services. It typically lasts approximately one hour billed at the firm's standard billable rate.*
- ii) Client Onboarding: The onboarding process is a separate service billed as a variable flat fee based on the number of accounts, covering the administrative and preparatory work necessary to commence portfolio management or financial planning services.*
- iii) Hourly Consulting: TradesPro LLC offers hourly consulting as an on-demand service for clients seeking ad-hoc, time-based investment advice, strategy input, or technical analysis support outside the scope of portfolio management, project-based financial planning, or pre-arranged educational services. This service is designed for clients who want expert insight without committing to a full portfolio management relationship or an*

extended planning engagement. Hourly consulting does not constitute ongoing financial planning, does not include account monitoring, and does not imply discretionary management. TradesPro LLC does not offer “ongoing financial planning” services.

Fees for these services are disclosed and agreed upon prior to commencement and are separate from any other advisory fees or services.

2. Comprehensive Financial Review

TradesPro LLC offers a comprehensive suite of financial planning and consulting services tailored to individual clients, businesses, and professional entities. These services are designed to address a variety of client needs that extend beyond portfolio management and provide both personal financial guidance and strategic consulting for complex financial situations.

The firm provides clients with traditional financial planning services, including retirement income analysis, tax planning coordination (in conjunction with the client’s CPA), insurance needs evaluation, estate planning coordination (in conjunction with the client’s attorney), education savings planning, personal financial statement preparation, cash flow and budgeting analysis, and overall net worth assessments. These services are delivered in consultation with clients and are customized based on their specific financial objectives, risk tolerance, time horizon, and long-term planning needs.

Where applicable, the firm may also assist clients in evaluating employer-sponsored plan rollovers, including IRA suitability and comparative analysis.

3. Trade Structuring and Strategy Development

In addition to traditional planning services, TradesPro LLC specializes in supporting clients who wish to develop or evaluate advanced trading strategies and high-conviction trade structures. These engagements involve custom technical and quantitative analysis to design trading frameworks tailored to client objectives, including speculative or tactical allocations when appropriate.

The firm's services may include developing detailed trading plans, designing custom trading strategies, creating technical indicators or modeling tools, volatility forecasting, defined-risk options structures, multi-leg options strategies, hedging overlays, position sizing frameworks, liquidity-driven entry and exit methodologies, and scenario-based risk modeling. Strategies may incorporate directional trades, volatility compression/expansion setups, momentum signals, liquidity zone targeting, and market timing techniques.

TradesPro may incorporate market timing methodologies as part of its analysis when designing customized trading plans or structuring tactical strategies. Such methodologies may include the use of technical indicators, liquidity analysis, volatility modeling, and quantitative entry and exit frameworks designed to assess market conditions and timing considerations relevant to client objectives. These techniques are integrated into strategy design but are not offered as a standalone advisory service.

These trade structuring engagements are delivered on a non-discretionary basis and do not involve portfolio management authority. Clients receive written trade plans or strategy recommendations for consideration and implementation. The work is highly customized and may include iterative development and risk scenario modeling based on client preferences.

Strategy/Plan Execution Disclosure: If a client wishes to have TradesPro LLC manage or implement any such strategy associated with this area of service, they must enter into an advisory agreement for discretionary or non-discretionary portfolio management services.

4. Advanced Financial Forecasting and Modeling Services

TradesPro also provides financial modeling services for clients and business owners who require detailed financial projections. These modeling engagements may include revenue forecasting, expense projections, cash flow modeling, debt service analysis, margin analysis, capital planning, sensitivity testing, and multi-scenario financial forecasting. Modeling projects may be executed as one-time or phased engagements depending on complexity, with each phase governed by a defined scope of work.

Portfolio Management Services

TradesPro LLC offers portfolio management services to help clients manage and grow their investment assets in alignment with stated financial goals, account types, and risk preferences. These services are offered on either a discretionary or non-discretionary basis, depending on the engagement terms. Portfolio management may be applied across a wide range of account types, including traditional and Roth IRAs, 401(k) rollovers, individual brokerage accounts, margin accounts, and taxable or cash investment accounts.

Portfolio management is a standalone service and is not contingent on a financial planning or consulting engagement. Clients may engage the firm to manage accounts directly under an advisory agreement based on their overall investment objectives.

TradesPro LLC offers two distinct portfolio management formats:

- **Core Portfolio Management Services**, which are designed for long-term investment strategies and wealth management across core account types, and
- **Tactical Portfolio Management Services**, which are intended for clients seeking to allocate a portion of capital to actively traded strategies involving short-term positions, defined-risk trade structures, and higher expected volatility.

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5. Core Portfolio Management Services (Discretionary and Non-Discretionary)

TRADESPRO LLC provides ongoing portfolio management services aligned with each client's goals, time horizon, and risk tolerance. The firm may request discretionary authority to select securities and execute transactions without requiring prior consent for each trade. Risk preferences and investment objectives are documented and reviewed with the client on a recurring basis.

As part of the onboarding process, clients may receive a customized investment strategy document outlining their current financial profile and establishing a framework for asset selection, risk exposure, and monitoring. Core Portfolio Management Services may include but are not limited to:

- *Investment Strategy:*
Development of a comprehensive trading and allocation framework tailored to the client's goals, risk appetite, and market outlook. Strategies may include trend-following, mean-reversion, or volatility-based positioning.
- *Personal Investment Policy:*
Where applicable, clients may receive a personalized investment strategy document outlining guidelines for portfolio management, acceptable risk levels, and preferred instruments.
- *Asset Allocation:*
Determination of appropriate allocations across asset classes (e.g., equities, fixed income, ETFs) using technical indicators, market structure, and statistical tools.
- *Asset Selection and Analysis:*
Security selection and trade ideas based on technical evaluation, momentum screening, and market context. TRADESPRO does not promote proprietary products.
- *Risk Tolerance Review:*
Review and documentation of each client's willingness and ability to tolerate volatility or loss, used to shape investment strategy and trade sizing.
- *Portfolio Monitoring:*
Ongoing analysis of client accounts to ensure alignment with stated strategy, including periodic reviews, rebalancing, and adjustment recommendations based on market changes or client updates.
- *Hedging Strategies:*
TRADESPRO may implement hedging strategies using options, inverse ETFs, or other market instruments to reduce downside exposure, limit volatility, or offset specific risks. These techniques are employed when consistent with the client's investment objectives and risk tolerance, and are used to support overall portfolio stability and trade-level risk management.

6. *Tactical Portfolio Management Services (Discretionary)*

TradesPro LLC offers Tactical Portfolio Management Services for clients who wish to allocate a portion of their capital to actively managed trading strategies involving short-term positioning, tactical signals, and opportunistic execution. These accounts are managed independently from a client's core portfolio and rely on discretionary trade selection, market timing, and dynamic allocation.

Strategy implementation is based on internally developed indicators and technical frameworks, and may include directional entries, volatility compression setups, breakout strategies, mean-reversion trades, and defined-risk options strategies (e.g., calendars, verticals, ratio spreads, butterflies, and other multi-leg structures).

Where suitable, trades may involve exchange-traded futures for directional exposure or hedging purposes. These transactions occur in margin-enabled accounts and may involve leverage, subject to client approval and custodial platform access. TradesPro LLC is not registered as a Commodity Trading Advisor (CTA) or Commodity Pool Operator (CPO) and does not operate a managed futures program.

Trade duration may range from intraday to several weeks, depending on market dynamics. All activity is managed with attention to strategy structure, timing, and client suitability. TradesPro does not engage in excessive or unjustified trading.

This service is suitable only for clients who accept the higher volatility and potential drawdowns associated with active trading mandates. Participation in Tactical Portfolio Management requires the client to explicitly elect this service within the Firm's advisory agreement. Additional risks and disclosures specific to this strategy are described in Item 8 of this brochure.

Publications Services

7. *Publications & Subscriptions*

TradesPro LLC may offer subscription-based research publications, newsletters, or periodic market commentary services. These publications are designed to provide general market analysis, trade structure discussions, volatility research, and educational content related to technical trading systems. Subscription content may include market outlooks, technical chart analysis, trading framework discussions, and tactical market structure reviews.

Access to subscription content is provided immediately upon payment and remains active throughout the current billing period. These services follow a subscription-based model similar to digital content or SaaS platforms, where all deliverables for the period are made available upfront.

Publications are provided for informational purposes only and do not constitute individualized investment advice, portfolio management, or trade recommendations. Clients or subscribers are solely responsible for any investment decisions they make based on the content of these publications.

Educational Services, Seminars, and Workshops

8. *Client Instructional Education*

TradesPro LLC offers educational services to clients seeking to improve their understanding of trading systems, market structure, options strategy design, technical analysis interpretation, trade planning

considerations, and risk management principles. These educational sessions are intended for informational purposes only and do not constitute individualized investment advice or portfolio management.

9. Instructional Events – Seminars, Workshops, and Speaking

In addition to one-on-one educational engagements, TradesPro may also deliver content through group formats such as seminars, workshops, webinars, or speaking engagements. These events are designed to support broader investor education and may be offered to individuals, client groups, or the general public.

10. Cryptoassets Education Services

TradesPro LLC offers cryptoasset education and limited advisory support as part of its broader financial planning and technical analysis services. These services are designed to help clients understand the structure, risk behavior, and suitability considerations of digital assets. Educational topics may include:

- How cryptoassets may interact with traditional asset classes
- General market dynamics and volatility patterns of digital assets
- Risk considerations and trading behavior associated with crypto-based instruments
- How crypto exposure may align with broader financial planning goals

TRADESPRO does not custody, directly recommend, or execute cryptoasset transactions on behalf of clients. Clients are responsible for executing crypto transactions through independent platforms and assuming all related risks.

TYPES OF INVESTMENTS

TRADESPRO generally limits its investment recommendations to investments that support its technical and market-based approach. These include publicly traded securities and fund vehicles that offer liquidity, transparency, and strategic flexibility. TRADESPRO primarily works with the following types of investments:

- Exchange-Traded Funds (ETFs): Pooled investment vehicles that track indexes, sectors, or strategies, offering transparency, liquidity, and cost-efficiency.
- Equities (Public Stocks): Shares of individual companies traded on public exchanges, used to pursue capital appreciation or targeted exposure.
- Options Strategies: Derivative contracts used to manage risk, hedge existing positions, or express directional market views in a controlled risk manner.
- Mutual Funds: Professionally managed portfolios of securities that provide diversification and access to a broad range of asset classes.
- Index-Tracking Vehicles: Funds designed to replicate the performance of a specific benchmark index, useful for passive exposure and strategic allocations.
- Fixed Income and Bond Funds: Investments that generate income through interest payments and are often used to provide balance and stability within a portfolio.
- Digital Assets: Primarily limited to Bitcoin, implemented via exchange-listed regulated vehicles (e.g., spot Bitcoin ETFs) for clients who elect digital asset exposure.

- **Alternative Investments:** Broadly defined as private equity, hedge funds, private real estate funds, venture capital, private debt, private placements, or pooled private vehicles. TradesPro does not recommend or manage client investments in these private alternative investment categories.

Other investment vehicles may be considered when suitable for a client's objectives. TRADESPRO does not offer proprietary funds or insurance products.

C. Customization of Services

All services are customized based on information gathered during the onboarding process, including a review of risk tolerance, time horizon, current holdings, and specific investment goals. Clients may impose reasonable restrictions on certain securities or industries, which TRADESPRO will accommodate if feasible within the strategy.

CLIENT ONBOARDING AND DOCUMENTATION

Prior to engagement, clients must complete documentation including a risk profile questionnaire and provide relevant account statements and financial information. Clients are responsible for notifying TRADESPRO of material changes that may affect their financial condition or investment objectives. TRADESPRO may also collaborate with the client's designated professionals, such as CPAs, estate attorneys, or tax advisors, to coordinate investment strategies with broader financial, legal, or estate planning considerations, when requested by the client.

THIRD-PARTY PLATFORMS AND RESEARCH PROVIDERS

TRADESPRO may use third-party analytics platforms, charting software, and research tools to support client-specific strategies. TRADESPRO does not utilize or distribute pre-built model portfolios.

D. Wrap Fee Programs

TRADESPRO does not participate in wrap fee programs.

E. Assets Under Management (AUM)

As of December 31, 2025, TRADESPRO LLC manages \$0 in non-discretionary regulatory assets under management (AUM).

As of December 31, 2025, TRADESPRO LLC manages more than \$100,000 but less than \$500,000 in discretionary regulatory assets under management (AUM).

Item 5: Fees and Compensation

TRADESPRO LLC offers transparent and clearly defined fee structures based on the advisory services selected by the client. All fees will be documented in detail within each client's advisory agreement and agreed upon in advance.

A. Fee Schedule

I. Financial Planning Services Fees

Consultation and Onboarding:

Initial Consultation

An initial consultation is a formal, billable advisory service, typically charged at a flat rate of \$250, and typically lasts one hour. This fee is negotiable based on the scope of the discussion and will be agreed upon prior to the meeting.

Client Onboarding

The onboarding process involves account setup, document collection, custodian coordination, financial goal analysis, and other administrative and advisory work necessary to establish the client relationship. It is typically billed as a flat fee consisting of a \$250 base fee plus \$125 per account, with each financial account counted as one unit regardless of ownership type (for example, a joint account counts as one account). This fee is negotiable, will be disclosed and agreed upon in advance, is generally charged once the account is established and funded, and is separate from ongoing advisory or financial planning fees.

Number of Accounts	Base Fee	Per Account Fee	Total Fee Formula
1 to 3 accounts	\$250	\$125	$\$250 + (\text{Number of Accounts} \times \$125)$
4 or more accounts	\$250	\$125	$\$250 + (\text{Number of Accounts} \times \$125)$

Example: A client with 3 accounts (e.g., 1 retirement IRA, 1 brokerage account, and 1 joint account) would pay: \$250 base fee + (3 × \$125) = \$625 total onboarding fee.

Hourly Consulting

\$250 per hour, billed in 15-minute increments. Invoiced after services are performed. Additional details on billing and engagement terms are provided in the Fee Terms and Service Conditions section.

Project Based Financial Planning Services:

TradesPro LLC offers financial planning services on a project basis. These services may include complex trade structuring, strategy development, advanced modeling, engineering technical indicators, financial forecasting, portfolio design, retirement planning, rollover analyses for retirement accounts, or other financial advisory analyses as requested by the client. All financial planning engagements are governed by a written Statement of Work ("SOW"), which defines the scope of services, estimated project fees, and billing terms. No work is performed until both parties have executed the applicable SOW and addendum and/or extension.

TradesPro LLC's project-based financial planning services are highly customized engagements structured through defined phases, documented scopes of work (SOWs), and targeted deliverables. These services are particularly suited for clients seeking in-depth financial or market analysis, execution-oriented deliverables, or advanced modeling support. All such services are priced on a project basis using a fixed fee calculated from time estimates and the complexity of the assignment.

Core Services Withing Project Based Financial Planning

1. Comprehensive Financial Review

Comprehensive review of a client's financial profile, including income, assets, liabilities, insurance, and retirement goals

2. Trade Structuring and strategy Development

High-touch engagements focused on market timing, technical strategy design, trade plan creation, and client-specific execution tactics

3. Advanced Financial Forecasting and Model Analysis

Customized macroeconomic and technical forecasting projects, often involving engineered indicators, data science models, or multi-variable simulation tools

Financial planning project fees are quoted based on an estimate of the time required to complete the requested scope of work, using a standard hourly rate of \$250. The estimated project hours are used to calculate a fixed fee for each project phase. The quoted project fee remains fixed once established, unless amended in writing. Fees for financial planning services are negotiable at the sole discretion of TradesPro LLC and may vary based on the scope, complexity, and nature of the engagement.

Each project phase operates under the following conditions:

- i) *Each phase is limited to a minimum of 3 billable hours and a maximum of 100 billable hours.*
- ii) *Each phase must be completed within 120 calendar days.*
- iv) *Clients pay fifty percent (50%) of the fixed project fee at the time of SOW execution.*
- v) *The remaining fifty percent (50%) is invoiced upon completion of the phase and upon receipt of deliverables.*
- vi) *If the scope of work materially changes, both parties will execute a written amendment to adjust the project fee accordingly.*

Technology and Extended Data Disclosure

Certain financial planning engagements may also require the use of specialized research services, premium data platforms, technology resources, or third-party tools to support advanced modeling, analysis, or client-specific deliverables. Where such resources are necessary for the successful completion of a project, any associated technology or research costs will be factored into the overall project estimate and included in the fixed fee quoted to the client. Clients are not billed separately for these resources unless expressly stated and agreed to in writing as part of the Statement of Work.

Fee Terms and Service Conditions:

- **Initial Consultation:**

An initial consultation is a formal, billable advisory service, typically charged at a flat rate of \$250, and typically lasts one hour. This fee is negotiable based on the scope of the discussion, will be agreed upon prior to the meeting, and remains subject to the Global Refund Policy.

- **Onboarding:**

Onboarding fees are typically charged as a flat fee consisting of a \$250 base plus \$125 per account. This fee is intended to reflect the time and effort involved in establishing the client relationship, including early-stage discussions, account setup, document collection, custodian coordination, and related administrative work. This fee is negotiable, will be disclosed and agreed upon in advance, is generally charged once the account is established and funded, and is subject to the Global Refund Policy.

- **Hourly Consulting:**

Billing for this service occurs strictly after the work is performed and is based on actual time incurred, billed at \$250 per hour in 15-minute increments. If no services occur during a given month, no invoice is generated.

This service is intended for individuals who are not engaged in other advisory services with TradesPro LLC, though it is made available to any client wanting a deeper level of insight or a focused consultation on a specific area. It is well suited for clients who want detailed technical analysis of market conditions, require a numbers-driven perspective to evaluate a complex or unusual financial situation, or prefer to seek elevated insight without entering a full portfolio management arrangement. Hourly consulting is designed as a flexible option for one-time needs or for situations that require more focused analysis than what is typically included in standard services.

Hourly consulting does not require prepayment and does not involve a refund policy, as fees are only billed after work is completed. Consulting fees may be negotiable depending on the nature of the engagement, and all agreed terms will be documented in writing prior to delivery. For any client using this service, the details and fees will always be discussed and agreed upon before any hourly consulting work begins. See Disclaimer:

DISCLAIMER: To maintain clear boundaries between services and fee structures, hourly consulting services are distinct from portfolio management and educational offerings. Engaging in hourly consulting does not modify or replace the terms of any existing advisory agreement based on assets under management. Clients receive separate billing and disclosures for these services to ensure transparency and regulatory compliance.

- **Project-Based Financial Planning:**

Project-based financial planning services are delivered under a defined scope of work and timeline, documented in a written Statement of Work (“SOW”). The SOW specifies the objectives, estimated hours, deliverables, and applicable delivery windows. Fees for project-based engagements are quoted based on complexity and estimated time and are typically billed in two installments: 50% of the total project fee is due at the start of the engagement, and the remaining 50% is due upon completion of the defined phase or project as outlined in the SOW. Any prepaid amounts for project-based services are subject to the firm’s Global Refund Policy described in Item 5.D.

II. Portfolio Management Services Fees

TradesPro LLC provides discretionary and non-discretionary portfolio management services tailored to each client's individual investment objectives, financial circumstances, and risk tolerance. Clients may engage in either Standard Portfolio Management Services or Tactical Portfolio Management Services depending on their investment preferences, objectives, and suitability assessments. Portfolio management services may include portfolio construction, strategic and tactical asset allocation, trade execution, periodic rebalancing, and ongoing monitoring. Depending on client objectives, certain accounts may utilize tactical portfolio management strategies involving advanced trade structures, technical models, volatility targeting, or short-term trading methodologies.

Clients engaging in Tactical Portfolio Management Services are billed under the same fee schedule as Core Portfolio Management clients, unless otherwise negotiated in writing. Tactical accounts may be subject to either asset-based fees or, where eligible, performance-based fees. Performance-based fees are only applied to non-retirement accounts and require that the client both qualifies under applicable regulations and explicitly agrees to such an arrangement. See the "Performance-Based Fees" section below for additional details.

Discretionary vs. Non-Discretionary Authority

TradesPro LLC offers portfolio management services on both a discretionary and non-discretionary basis, as elected by the client in the advisory agreement. Under discretionary authority, the firm is authorized to determine the securities to be bought or sold, the amount of securities to be transacted, and the timing of such transactions without obtaining advance client consent for each trade. Under non-discretionary arrangements, the firm will provide recommendations, but the client retains final decision-making authority and must approve all transactions before execution.

Account Types

Portfolio management services are available for a variety of account types, including individual brokerage accounts, cash management accounts, taxable investment accounts, traditional and Roth IRAs, rollover IRAs, employer-sponsored retirement plans, and other qualified or non-qualified investment accounts. Clients may engage the firm for one or multiple account types based on their individual financial needs.

AUM Fee Schedule

For Portfolio management services under the AUM Fee Schedule, they are charged as a percentage of assets under management ("AUM"), calculated based on the market value of the managed assets as of the last business day of each calendar quarter. Fees are billed quarterly, in arrears, based on the account valuation at the end of the billing period. The standard AUM fee schedule is negotiable but will not exceed the following maximum annual rates:

Assets Under Management	Annual Fee (%)
Up to \$250,000	1.50%
\$250,001 to \$1,000,000	1.25%

Assets Under Management	Annual Fee (%)
\$1,000,001 to \$3,000,000	1.00%
Over \$3,000,000	0.75%

All fee arrangements are documented in Exhibit A – Fee Schedule to the signed Client Advisory Agreement prior to the commencement of services.

Performance-Based Fees

In certain cases, TradesPro LLC may offer clients the option to engage in performance-based fee arrangements. Performance-based fees are only charged to clients who meet the definition of “Qualified Client” as defined under applicable federal and state securities laws. Performance fees may apply to any non-retirement account type if the client is qualified and consents to the arrangement. Performance-based fees are not applied to retirement or tax-deferred accounts, including IRAs and other qualified plans.

Performance-based fees are calculated quarterly in arrears and equal fifteen percent (15%) of the net profits generated within the client’s account, subject to a high-water mark provision. Under this methodology, performance fees are charged only on new net profits that exceed the client’s highest prior account value.

Performance-based fee arrangements create potential conflicts of interest as the firm has an incentive to take greater risks in seeking higher returns. TradesPro LLC manages these conflicts through adherence to its fiduciary obligations, internal supervision, and full client disclosure.

See Item 6 of this brochure for additional information regarding supervision and conflicts related to performance-based compensation.

Fee Deduction and Custody Disclosures

Fees are deducted directly from client custodial accounts maintained at independent qualified custodians, based on written authorization provided by the client. Clients receive statements directly from their custodian at least quarterly, showing all disbursements from the account, including fees paid to TradesPro LLC. Clients are encouraged to review these custodial statements carefully and compare them to any reports provided by TradesPro LLC.

The firm does not maintain custody of client funds or securities other than limited authority to deduct advisory fees as described above. This fee deduction authority does not constitute custody under Rule 206(4)-2, provided that the client has authorized such deductions in writing, the firm issues an invoice detailing the fee calculation, and the qualified custodian sends account statements directly to the client on at least a quarterly basis.

- **Assets Under Management (AUM) Fees:**

TradesPro LLC charges AUM fees as a percentage of the market value of assets under management, billed quarterly in arrears based on the account as of the last business day of each calendar quarter. If a client terminates the advisory agreement mid-quarter, the final fee will be prorated based on the number of calendar days services were provided during that billing cycle or until the account is fully transferred — whichever occurs first. AUM fees are negotiable based on account size, service complexity, or other client-specific factors. All negotiated rates are documented in Exhibit A of the Client Advisory Agreement or a separately signed fee schedule.

- **Performance-Based Fees:**

Performance fees are assessed only to qualified clients who consent to such arrangements. These fees equal 15% of net profits and are billed quarterly in arrears. If termination occurs mid-quarter, performance fees will be calculated and prorated based on profits generated during the period the firm managed the account within that quarter. No performance fees will be assessed for any period after termination. If the account experiences a loss during the partial period, no performance fee is due. Performance fees may be negotiable for qualified clients and all negotiated fees will be documented in writing before service commencement.

III. Publications and Subscription Services

Subscription-based publications include investment research, newsletters, market commentary, and educational content. Subscription tiers are set at \$50 or \$100 per month, billed monthly in advance. Promotional discounts or coupons may be applied periodically to adjust subscription fees for specific periods. These subscription services do not constitute individualized advisory services and do not establish an investment advisory relationship.

- **Subscription Fees:**

Subscription fees are billed monthly in advance, and clients receive immediate access to all subscriber content for the billing period at the time payment is processed. Because all deliverables for that billing cycle—including archives, research materials, and commentary—are made available upfront, the subscription fee is considered fully earned once access is provided. This approach is consistent with common digital subscription or SaaS models, where content becomes available immediately upon payment. Clients may cancel at any time to prevent future billing cycles; however, no refund applies for the current billing period after access has been granted.

IV. Educational Services, Seminars, and Speaking Fees

TradesPro LLC offers a range of educational services designed to enhance client knowledge and skills related to trading, investment strategies, market analysis, and cryptoassets. These services include personalized training sessions, workshops, seminars, and speaking engagements tailored to meet the needs of both advisory clients and external participants. Educational offerings aim to provide practical insights and actionable guidance but do not establish an advisory relationship unless explicitly stated.

Each service is delivered with professionalism and flexibility to accommodate diverse client requirements.

Fee Terms and Service Conditions

- **Client Instructional Education Services (including Crypto):**

TradesPro LLC provides one-on-one or small-group scheduled educational sessions covering trading strategies, technical analysis, and cryptoasset education. Sessions are billed upfront at \$250 per hour, with a maximum fee of \$1,000 per session. The first \$250 of any prepaid session is non-refundable, as it represents the first hour of service and reserves the time on the advisor's schedule. Clients may request to reschedule with advance notice. If a session is canceled entirely, any prepaid amount beyond the first \$250 will be refunded, provided the session has not already been delivered. Unused time during a session is refundable in 15-minute increments. These services are optional, non-advisory, and do not establish an investment advisory relationship. Small-group sessions follow the same pricing and terms.

- **Seminars & Workshops:**

Seminars & Workshops are billed at a flat fee of \$2,000 per day, plus reasonable travel and out-of-pocket expenses. Fees for seminars & workshops are typically invoiced upfront. Due to the firm's commitment of resources, seminar & workshop fees are generally non-refundable. Cancellation policies require written notice, and any exceptions to refunds must be agreed in writing.

- **Speaking Engagements:**

Speaking engagements are billed similarly to seminars, with a flat fee of \$2,000 per day plus reasonable expenses. Fees are usually invoiced upfront and are generally non-refundable. Cancellation requires written notice, and any refund exceptions are at the firm's discretion and must be documented.

V. Fee Negotiability, Termination, Refunds, and Compensation Disclosure

Fees for certain services offered by TradesPro LLC — including project-based financial planning, subscription-based research, Instructional educational, seminars, and speaking engagements — may be negotiable depending on the scope of services, client circumstances, or promotional considerations. All negotiated fees will be documented in writing and agreed upon prior to commencement of services.

Portfolio Management Services, including both asset-based and performance-based fee arrangements, may be terminated by either party upon 30 days' written notice, to allow for an orderly wind-down of investment accounts, termination of discretionary authority, and coordination with custodians. Since these services are billed quarterly in arrears, the final advisory fee will be prorated based on the number of calendar days services were provided during the final billing period, up to the effective date of termination or the date all assets are fully transferred from the account — whichever occurs first.

Clients may terminate any service by submitting written notice in accordance with the terms of their advisory agreement or service contract. The timing of termination, refund eligibility, and any refund amount will be governed by the cancellation and prepayment policies outlined in Item 5.D and the firm's

service-specific refund schedule. Fees earned based on service delivery, time reserved, or non-recoverable expenses are not refundable unless otherwise agreed in writing.

TradesPro LLC does not receive commissions, referral fees, kickbacks, or other forms of compensation or soft benefits from third parties in connection with the services provided to clients.

B. Payment of Fees

TradesPro LLC issues an invoice for services provided, consistent with the applicable billing method.

For portfolio management services under the AUM fee structure, fees may be deducted directly from the client's custodial account only if all of the following conditions are met, consistent with the Custody Rule Fee Deduction Exemption under Rule 206(4)-2(b)(3) of the Investment Advisers Act of 1940. These conditions are designed to ensure that TradesPro LLC is not deemed to have custody solely due to its ability to deduct fees:

- 1. The client provides written authorization to the custodian permitting fee deduction;***
- 2. TradesPro LLC sends an invoice to the client detailing the fee calculation; and***
- 3. The custodian sends account statements directly to the client at least quarterly, reflecting all disbursements, including advisory fees.***

Fees for portfolio management services are billed quarterly in arrears, based on the account value at the end of the billing period. If direct fee deduction is not authorized or is otherwise unavailable, clients are required to pay invoices by the stated due date.

Other services—including project-based financial planning, onboarding, initial consultations, client instruction education, instructional events, and cryptoasset education—may be invoiced separately depending on the service type and applicable arrangement. Billing timing depends on the service type and applicable arrangement. Certain services are typically billed in advance, while others may be billed after the service is provided or after the applicable account is established and funded. Scheduled services such as seminars, workshops, and speaking engagements are generally prepaid services and must be paid in advance to confirm scheduling. Any prepaid amounts remain subject to the Global Refund Policy.

Hourly consulting services are billed in arrears after the service is provided. TradesPro LLC may aggregate fees across multiple services and issue a single invoice on a quarterly basis, unless an alternate arrangement is agreed upon in writing. Invoices may be paid by ACH transfer, check, or another approved electronic method. TradesPro LLC does not accept cash payments and does not maintain custody of client funds.

C. Client Responsibility for Third-Party Fees

Clients are responsible for brokerage commissions, custodian charges, transaction costs, and internal management fees associated with mutual funds, ETFs, and other investment vehicles. These fees are separate and distinct from TRADESPRO's advisory fees.

D. Prepayment of Fees

Key Definitions

- **Execution Date:** The date on which the client signs the advisory agreement with TRADESPRO.
- **Service Window:** The total period between receipt of payment and the scheduled delivery of the applicable service. No service is scheduled more than five months after payment.
- **Prepaid Fees:** Any fees paid before the corresponding service is rendered, including deposits, retainers, or subscriptions.
- **Non-Recoverable Costs:** Any third-party, travel, venue, or development expenses incurred by TRADESPRO in advance of a scheduled engagement.

Prepayment of Fees, Termination, and Refund Policy Overview

TRADESPRO may collect fees in advance for certain services, including project-based engagements, onboarding processes, and speaking & training sessions. The following section addresses how prepaid fees are handled, including applicable refund rights and safeguards for each service type. Fees are considered earned as they relate to the defined scope and expected delivery of each service, rather than the passage of time or general availability.

TRADESPRO does not charge advisory fees based on fixed billing periods for its prepaid services. Instead, each service involves a defined scope, a one-time or project-based payment structure, and an associated delivery window. Refund eligibility is governed by each service's stated cancellation window and terms, as detailed in the firm's service refund policy.

Should a client choose to terminate their advisory contract, they must do so by submitting a written notice of termination which will establish a formal termination date. TRADESPRO will refund any applicable prepaid fees in accordance with the refund policy for the specific service. Because fees are tied to the delivery of a defined scope of work or service milestone, refund eligibility is determined by the specific service's cancellation policy, not by the passage of time or a recurring billing cycle. Each service includes its own cancellation terms and refund conditions, which are outlined in the section below. For convenience, please reference "[Refund Policy by Prepaid Service](#)"

Where applicable, TRADESPRO identifies non-refundable components (such as preparation, scheduling, and venue costs) and offers refunds only for uncommitted or unused portions of a service, as clearly outlined per service type.

We do not charge fees more than five months in advance, and we do not collect more than \$500 in advance unless those fees are earned upon delivery of services. No prepaid service is ever scheduled for delivery more than five months after payment. Most services are targeted for completion within a 30-calendar-day window, and the Firm strives not to exceed 45 days. For more complex project phases, the delivery window may extend up to 90 days. This ensures timely execution and avoids triggering custody under applicable regulatory rules.

How to Request a Refund

Our refund policy is designed to clearly outline expectations, protect both client and firm interests, and provide structured flexibility where appropriate. The approach emphasizes transparency, defined service timelines, and good-faith resolution if circumstances warrant it.

To request a refund, email us at ClientServices@tradespro.net with your name, the service in question, the payment date, and a short not or summary of the reason. Clients are encouraged to follow up with a phone call to confirm receipt. We review all refund requests in good faith and aim to respond promptly.

Refund Timing & Processing

Refunds are issued to the original payment method unless otherwise agreed in writing. The Firm processes approved refunds promptly, and no later than 30 calendar days from the date of approval. Refunds are not issued for services already delivered or for any fees clearly marked as non-refundable. TRADESPRO does not retain prepaid fees for services scheduled beyond a five-month service window.

Service Completion and Resolution Commitment

All services are expected to be completed in alignment with their intended scope and within the applicable service window. Fees are tied to the successful execution of services. Timely delivery reflects both project health and client expectations.

If delays or complications materially interfere with the completion of a service as agreed upon, TRADESPRO will assess the situation in good faith and determine an appropriate resolution. Refunds will be considered as part of any resolution where services are not completed as expected. We do not retain fees for services that are not delivered in a manner consistent with their intended scope.

We recognize that unforeseen situations may arise. In such cases, we are committed to treating clients with fairness and professionalism. When appropriate, alternative resolutions will be considered and clearly documented.

Global Refund Policy Statement (of prepaid services)

TRADESPRO refunds all unearned prepaid fees for prepaid services, including but not limited to Initial Consultations, Onboarding Services, Project-Based Engagements, Education & Training Sessions, and Seminars, Workshops, and Speaking Engagements. Any prior non-refundable language is void unless tied to documented work performed or actual non-recoverable costs. This policy applies only to amounts paid in advance. If no fee was prepaid, no refund is due under this policy.

Refund Formula:

Refund = Prepaid Fee – (Hours Worked × \$250/hour) – Non-Recoverable Costs.

- Hours Worked can include preparation, research, scheduling, and deliverables.
- Non-Recoverable Costs include vendor fees, travel, venue, or similar hard expenses. If no work or costs exist, the full prepaid amount is refunded.
- If no work has been performed and no costs have been incurred, the full prepaid amount will be refunded.

Service-Specific Refund Summaries

- **Initial Consultation** – This service is a one-time session scheduled in advance. The fee for the consultation is agreed upon prior to the meeting and is generally prepaid. The fee remains subject to the Global Refund Policy. Refunds, if any, are based on actual work performed at the firm's stated hourly rate and any documented non-recoverable costs. If no work has been performed and no costs have been incurred, the full prepaid amount will be refunded. Clients may reschedule the session with at least 72 hours' notice.
- **Onboarding Fees** - Onboarding begins promptly after agreement execution. The onboarding fee is disclosed and agreed upon in advance and is typically prepaid, although in some cases it may be billed after the fact. The fee remains subject to the Global Refund Policy. Refunds, if any, are calculated based on the amount paid, less actual time worked at \$250 per hour and any documented non-recoverable costs. If no work has been performed and no costs have been incurred, the full amount paid will be refunded.
- **Project-Based Work** - Project-based work covers services such as Comprehensive Financial Review, Trade Structuring, and Forecasting & Modeling. These services may involve multiple phases under a defined scope with a prepaid fee. Refunds follow the Global Refund Policy and are calculated as Prepaid Fee minus actual time worked at \$250/hour and documented non-recoverable costs. If no work has been performed and no costs incurred, the full prepaid amount is refunded.
- **Newsletter Subscription** – Clients are billed monthly in advance and receive immediate access to all subscription content upon payment. Access remains active through the end of the current billing period, even if the client cancels mid-cycle. Because full access and all deliverables for the period are granted at the start of the billing cycle, the subscription fee is considered fully earned when access is provided. Clients may cancel at any time to prevent future billing cycles, but no refunds apply for the current billing cycle once access has been granted. This model ensures clients receive immediate, unrestricted use of all subscription content upon payment, similar to standard subscription-based services such as streaming or SaaS platforms.
- **Education / Training Sessions** - Each session is scheduled in advance and billed as a prepaid service. Refunds follow the Global Refund Policy. If a session is canceled before delivery, the unused portion of any prepaid amount is refunded based on actual time worked at \$250/hour and documented non-recoverable costs. If no work has been performed and no costs incurred, the full prepaid amount is refunded. Unused time within partially completed sessions is refunded in 15-minute increments. No refund is provided for delivered service, but unused prepaid funds are returned. Clients may reschedule sessions with reasonable advance notice without penalty.

- **Seminars / Workshops** - Seminars and workshops are billed as prepaid services. Refunds follow the Global Refund Policy and apply only to unused prepaid funds. No refund is provided for delivered service, but unused prepaid funds are returned after deducting actual time worked at \$250/hour and documented non-recoverable costs, such as venue or material expenses. If no work has been performed and no costs incurred, the full prepaid amount is refunded.
- **Speaking Engagements** - Speaking engagements are billed as prepaid services. Refunds follow the Global Refund Policy and apply only to unused prepaid funds. No refund is provided for delivered service, but unused prepaid funds are returned after deducting actual time worked at \$250/hour and documented non-recoverable costs, such as travel or preparation expenses. If no work has been performed and no costs incurred, the full prepaid amount is refunded.

Refund Policy by Prepaid Service Matrix

Service	Refund Terms (Plain English)	Important Notes	Custody Safeguards
Initial Consultation	Prepaid; refunds follow Global Refund Policy.	Session can be rescheduled with notice.	No prepaid funds retained beyond scheduled date.
Onboarding Fees	Prepaid; refunds follow Global Refund Policy.	Begins after agreement execution.	No prepaid funds retained beyond 5 months.
Project-Based Work	Prepaid; refunds follow Global Refund Policy.	Scope and timelines defined in Statement of Work (SOW).	No prepaid funds retained beyond 5 months.
Newsletter (Subscription)	Fees billed in advance; fully earned when access is granted for the billing cycle.	Immediate access provided at billing start; cancellation stops future periods. (example: Netflix)	No prepaid funds retained beyond current cycle.
Education Sessions	Prepaid; refunds follow Global Refund Policy.	Unused time calculated in 15-min increments.	No prepaid funds retained beyond 30 days.
Seminars / Workshops	Prepaid; refunds follow Global Refund Policy.	Applies to scheduled events and workshops.	No prepaid funds retained beyond 5 months.
Speaking Engagements	Prepaid; refunds follow Global Refund Policy.	Applies to keynote or client-hosted events.	No prepaid funds retained beyond 5 months.

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E. Outside Compensation for the Sale of Securities

TRADESPRO does not receive any outside compensation or commissions from the sale of securities or other investment products to its advisory clients.

IRA Rollover Considerations

TRADESPRO may recommend clients withdraw assets from an employer-sponsored retirement plan and roll those assets into an Individual Retirement Account (IRA) managed by TRADESPRO. In doing so, TRADESPRO will charge an asset-based advisory fee as outlined in the client agreement. This recommendation presents a potential conflict of interest, as it could result in additional fee-based compensation. Clients are not obligated to complete a rollover, nor are they required to have assets managed by TRADESPRO upon completing a rollover. Clients should carefully evaluate options including maintaining funds in their existing employer plan, moving assets to a new employer's plan, taking a taxable distribution, or rolling assets into an IRA. Each option has unique advantages and disadvantages, such as varying fee structures, investment options, distribution flexibility, creditor protections, and tax implications. TRADESPRO encourages clients to consult with their CPA, tax attorney, or financial professional to thoroughly understand the implications and suitability of any rollover decision before proceeding.

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

TRADESPRO LLC may charge performance-based fees to certain clients based on a percentage of realized investment gains. These arrangements are available only to clients who meet the definition of a Qualified Client under Rule 205-3 of the Investment Advisers Act of 1940 and require execution of a written agreement outlining the applicable terms.

For Qualified Clients who elect performance-based portfolio management, TRADESPRO charges both an asset-based advisory fee and a performance-based fee, as described in the Client Advisory Agreement and Performance Fee Addendum.

The Firm also manages accounts under asset-based advisory fee arrangements (i.e., a percentage of assets under management). Managing both types of accounts — known as side-by-side management — creates a potential conflict of interest. Specifically, the Firm could, in theory, have an incentive to allocate more time, attention, or investment opportunities to performance-fee accounts that could result in higher compensation.

TRADESPRO addresses this potential conflict by applying a consistent, client-centered approach across all account types. Investment decisions are based solely on each client's objectives, risk profile, and investment strategy — not on the compensation model. The Firm adheres to a uniform investment process and execution standard across its client base and does not favor accounts based on fee arrangements.

TRADESPRO is committed to fair and equitable treatment for all clients and upholds its fiduciary duty regardless of billing structure.

Item 7: Types of Clients

TRADESPRO LLC generally provides investment advisory services to a broad range of clients, including:

- Individual investors
- High-net-worth individuals
- Retirement accounts (such as traditional and rollover IRAs)
- Small Businesses
- Institutional clients seeking consulting and strategy guidance on a non-discretionary basis
- Qualified Client

TRADESPRO's services are customized based on each client's financial objectives, risk tolerance, time horizon, and other relevant factors.

TRADESPRO does not impose a minimum account size for consulting or portfolio management services. The firm welcomes clients of all account sizes and tailors services to meet individual needs. However, clients wishing to engage in a performance-based fee structure must meet the definition of a Qualified Client and sign a specific agreement outlining the applicable fee terms.

Performance-Based Fees and Qualified Clients Disclosure

Performance-based fee arrangements are available only to clients who meet the definition of a Qualified Client under Rule 205-3 of the Investment Advisers Act of 1940. A Qualified Client generally includes individuals or entities with at least \$1.1 million under the adviser's management or a net worth exceeding \$2.2 million, excluding their primary residence.

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

A. Methods of Analysis and Investment Strategies

Methods of Analysis

TRADESPRO LLC primarily utilizes technical analysis, quantitative analysis, charting analysis, market structure analysis, and options flow analysis to formulate its investment recommendations. Technical analysis involves the study of past market prices and volume patterns to forecast future price movements. Quantitative analysis focuses on the use of mathematical models, proprietary indicators, volatility studies, and liquidity measurements to identify trading opportunities and assess portfolio risk. Charting analysis examines historical price behavior through various chart formations and technical indicators to identify potential areas of support, resistance, and trend continuation or reversal. Market structure analysis evaluates liquidity zones, institutional flows, and volatility dynamics to anticipate market behavior and identify optimal entry and exit points. Options flow analysis considers the trading activity of listed options to detect potential shifts in sentiment and positioning by large market participants.

While TRADESPRO may occasionally consider broad fundamental or macroeconomic factors such as interest rates, inflation expectations, and systemic risks, its investment philosophy remains primarily rooted in technical, quantitative, and market-based analysis. In addition, TRADESPRO may reference concepts from Modern Portfolio Theory (MPT) when considering portfolio construction and risk-return trade-offs, although its strategies are more tactical and dynamic in nature.

Additional descriptions of TRADESPRO LLC's primary and supplementary methods of analysis are provided below for further clarity.

i) Fundamental Analysis:

While not our primary method, we may assess company-specific or macroeconomic fundamentals such as earnings, interest rates, inflation trends, and fiscal/monetary policy when forming longer-term views.

vii) Modern Portfolio Theory (MPT):

We may refer to MPT principles when constructing or reviewing portfolios, especially in evaluating risk/reward trade-offs and diversification goals.

viii) Charting Analysis:

Involves identifying trends, price patterns, and formations across various timeframes to forecast market direction. Charting assists in identifying potential support/resistance zones and key breakout or reversal levels.

ix) Technical Analysis:

Focuses on historical price and volume data to identify trading signals and market sentiment. This includes tools such as moving averages, volatility bands, momentum oscillators, and trend-following systems.

x) Quantitative Analysis:

Employs mathematical models and data-driven metrics to analyze market behavior, including algorithmic signal generation, volatility targeting, and statistical pattern recognition.

xi) Market Structure Analysis:

Analyzes liquidity zones, volume distributions, institutional trading behavior, and key price levels to anticipate turning points or continuation patterns.

xii) Options Flow Analysis:

Reviews institutional options trading activity to detect shifts in sentiment, directional conviction, or positioning that may inform trade setups.

xiii) Cyclical and Macro-Economic Analysis:

Considers the impact of broad business cycles, economic indicators, and geopolitical events when evaluating market regimes.

Investment Strategies

TRADESPRO's investment strategies are tactical and adaptive, designed to respond to changing market conditions. Strategies include trend-following, mean-reversion techniques, and volatility-targeted allocations. TRADESPRO actively trades equities, ETFs, and options to capture market inefficiencies and manage portfolio risk. Defined-risk options strategies, including debit spreads, credit spreads, iron condors, calendar spreads, and butterflies, where the maximum potential loss is generally known at trade initiation, are utilized. Portfolio allocations and risk exposures are dynamically adjusted based on technical signals, liquidity conditions, volatility forecasts, and client-specific factors such as risk tolerance, investment objectives, and liquidity needs.

xiv) Tactical Trading Strategies:

Involve actively managing positions over shorter timeframes based on technical and market-driven signals.

xv) Trend-Following Approaches:

Aim to identify and participate in extended price movements that demonstrate directional strength over time.

xvi) Mean-Reversion Concepts:

Seek to take advantage of temporary price deviations from historical or statistical norms, under the assumption of eventual re-alignment.

xvii) Volatility-Aware Allocation:

Adjusts exposure levels in response to changing market conditions, particularly periods of increased or reduced price volatility.

xviii) Options-Driven Strategies:

May incorporate defined-risk structures or income-oriented approaches using exchange-listed options contracts.

xix) Long-Term Investment Allocation:

May include diversified holdings aligned with client objectives, with periodic evaluation of risk, performance, and prevailing market conditions.

Clients must understand that investing in securities involves the risk of loss and should be willing and able to bear the loss of principal.

Use of Alternative Investments

TradesPro LLC does not currently recommend or allocate to private placements or traditional alternative investments such as hedge funds, private equity, private real estate, or venture capital offerings. These investments are often illiquid, complex, and less transparent, and TradesPro does not believe they are appropriate for most clients.

At a client's request, the firm may provide exposure to certain crypto-based alternative asset classes through publicly traded vehicles such as ETFs or publicly listed companies that invest in or track alternative assets (e.g., MSTR, IBIT). These securities are evaluated using the same due diligence, risk review, and suitability process applied to all publicly traded investments.

B. Material Risks Involved

Broader Investment Risk

Clients should understand that investing in securities and utilizing the methods and strategies employed by TRADESPRO LLC carries inherent risks.

Clients should also understand that investment portfolios managed by TRADESPRO LLC will generally be exposed to both systematic and non-systematic risks. Systematic risks, which affect the entire market, cannot be eliminated through diversification. Non-systematic risks, which are specific to individual companies or sectors, may be mitigated through diversification, but not entirely eliminated. TRADESPRO LLC manages these risks as prudently as possible based on each client's investment strategy, objectives, and stated risk tolerance. Nevertheless, clients must be willing to accept both types of risk as inherent aspects of investing. See below for further information regarding associated risks and types of risk.

xx) Systematic Risk: This refers to the risk of broad market declines or macroeconomic events that impact nearly all securities and cannot be diversified away. Examples include economic recessions, interest rate changes, and geopolitical events.

xxi) Non-Systematic Risk: This refers to risks specific to individual companies, industries, or securities, such as management changes, competitive pressures, or product failures. These risks can generally be reduced through diversification across multiple investments.

xxii) Market Risk: This refers to the possibility that an overall market decline will negatively impact the value of individual investments.

xxiii) Volatility Risk: This is the risk that price fluctuations, often sudden and severe, will impact portfolio value and the performance of tactical strategies.

xxiv) Liquidity Risk: This is the risk that securities may be difficult to sell promptly at an advantageous price, particularly during periods of market stress.

xxv) Market Timing Risk: This refers to the risk that discretionary decisions to enter or exit positions based on technical signals, volatility shifts, or broader market conditions may be inaccurate or poorly timed. Tactical strategies that rely on market timing may underperform in periods of trendless movement or when reversals occur unexpectedly.

- xxvi) *Futures Trading Risk: Futures contracts involve leverage and are marked-to-market daily. Losses may exceed the initial margin deposit. Futures are highly sensitive to volatility and carry additional risk from liquidity changes, rollover mechanics, and macroeconomic disruption. These contracts are not suitable for all clients and require platform access and trading approval.*
- xxvii) *Margin Risk: Tactical strategies may be executed in margin-enabled accounts. Trading on margin increases both risk and potential exposure. Clients using margin may be subject to interest charges, margin calls, or forced liquidation of positions. In extreme cases, losses may exceed the original investment.*
- xxviii) *Options Risk:*
- a) *This includes the possibility of losing the entire premium invested, heightened leverage effects, and time decay eroding option value. Additional risks include volatility mispricing, liquidity constraints in options markets, and the impact of rapidly changing implied volatility levels. Strategies involving options require careful management and are not suitable for all investors.*
 - b) *TRADESPRO's options strategies are focused on defined-risk structures such as debit spreads, credit spreads, iron condors, calendar spreads, ratio spreads, and butterflies, where the maximum potential loss is generally known at trade initiation. In some cases, strategies may involve premium-selling through hedged or structured positions designed to generate income or take advantage of volatility conditions.*
 - c) *However, clients should be aware that executing certain options strategies, particularly those involving short positions or spreads, may expose them to assignment risk. In particular, short put positions may be assigned, resulting in ownership of the underlying stock, which can create additional downside exposure beyond the initial premium structure. Clients should ensure they understand these risks and obtain the appropriate level of trading approval from their brokerage or custodian before engaging in options strategies.*
- xxix) *Fundamental and Macro Analysis Risk: Long-term forecasts based on company fundamentals or macroeconomic trends are inherently uncertain. Outcomes may deviate from projections due to unforeseen variables or delayed effects.*
- xxx) *Cyclical Analysis Risk: Market cycles may not repeat predictably, and external disruptions may interrupt expected trends. Historical comparisons may therefore provide limited value.*
- xxxi) *Modern Portfolio Theory Risk: MPT frameworks assume stable correlations and distribution of returns. In periods of financial stress or systemic dislocation, these assumptions may fail, leading to concentrated or unintended exposures.*
- xxxii) *General Investment Risk: All strategies involve risk. TRADESPRO LLC implements diversification, signal validation, and ongoing monitoring, but no strategy guarantees profits or avoids losses. Clients should be prepared for adverse periods and understand that investment results may vary significantly from expectations.*

While TRADESPRO seeks to manage these risks through portfolio construction, strategy diversification, and disciplined risk management practices, no investment strategy can eliminate all risk.

Risks Related to Technical Analysis & Empirical Methods

- xxxiii) *Technical and Charting Analysis Risk: TRADESPRO LLC places significant emphasis on technical and chart-based analysis as part of its overall investment process. While this method can offer timely insights and assist in identifying potential market inflection points, it carries unique risks that clients should understand. Technical analysis relies heavily on historical price and volume data to interpret market patterns and forecast possible outcomes. These interpretations are inherently probabilistic and not guaranteed to repeat in future market conditions. Patterns may break down, and signals can fail due to unexpected macroeconomic events, low-*

volume trading environments, or structural changes in the market. Similarly, charting techniques are subject to analyst discretion and may lead to different conclusions depending on timeframe or method applied. While TRADESPRO applies risk controls and multiple forms of confirmation to reduce reliance on any single input, no technical or charting-based signal is infallible. Clients should be aware that during periods of heightened volatility, news-driven shocks, or regime changes, the reliability of technical signals may decline considerably.

xxxiv) *Quantitative Analysis Risk: Quantitative models depend on data accuracy and assumptions that may break down under atypical market conditions. Overfitting or excessive reliance on back-tested strategies may also lead to poor outcomes.*

xxxv) *Market Structure Risk: Analytical assumptions about liquidity levels or institutional order behavior may be incorrect or based on misleading signals. The interpretation of order flow can be complex and is subject to manipulation.*

xxxvi) *Options Flow Analysis Risk: Observed institutional options activity can be difficult to interpret and may reflect non-directional strategies such as hedging or arbitrage. Misinterpretation can lead to poor entry or exit timing.*

xxxvii) *Trend-Following Strategy Risk: These strategies rely on the continuation of existing trends. In choppy or reversing markets, they may suffer from frequent false signals.*

xxxviii) *Mean-Reversion Strategy Risk: The assumption that price deviations will revert to mean levels may not hold during strong or prolonged trends.*

xxxix) *Volatility Allocation Strategy Risk: Reducing or increasing portfolio exposure based on perceived volatility conditions may result in missed opportunities or suboptimal positioning during periods of rapid market change.*

Investment Strategy Risks

TRADESPRO LLC employs a variety of investment strategies designed to align with each client's objectives and risk tolerance. These strategies, whether long-term or tactical, expose clients to a variety of risks over time. These risks include, but are not limited to, inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political or regulatory risk. While tactical strategies aim to respond to evolving market conditions, no strategy can eliminate exposure to broader market and economic forces. Clients must be willing and able to accept these risks as part of the investment process.

xl) *Long-Term Strategy Risk: Clients utilizing long-term investment strategies, particularly for retirement or wealth preservation purposes, should understand that prolonged holding periods expose investments to inflation (purchasing power) risk, interest rate risk, economic downturns, market volatility, and changes in political or regulatory environments. Although diversification and periodic review may mitigate some of these risks, they cannot eliminate them. Clients must be willing to accept these risks as inherent in long-term investing.*

xli) *Tactical Trading Strategy Risk: Tactical trading strategies involve actively managing positions over shorter timeframes based on technical and market-driven signals. These strategies aim to adapt to evolving market conditions but are subject to risks such as whipsaw price action, signal failure, execution delays, increased transaction costs, and the potential for missed longer-term market trends. Clients should understand that tactical trading carries the risk of short-term losses and increased portfolio turnover, which may impact performance and increase costs over time.*

- xlj) Options-Based Strategy Risk: Defined-risk structures can still result in full premium loss. Factors such as market gaps, volatility shifts, and early assignment add additional complexity and risk.*
- xljii) Trend-Following Strategy Risk: These strategies rely on the continuation of existing trends. In choppy or reversing markets, they may suffer from frequent false signals.*
- xljiv) Mean-Reversion Strategy Risk: The assumption that price deviations will revert to mean levels may not hold during strong or prolonged trends.*
- xljv) Volatility Allocation Strategy Risk: Reducing or increasing portfolio exposure based on perceived volatility conditions may result in missed opportunities or suboptimal positioning during periods of rapid market change.*

Additional Risks Associated with Tactical Portfolio Management

Clients who elect Tactical Portfolio Management Services should be aware of the elevated risks associated with short-term trading and dynamic allocation strategies. Tactical Portfolio Management involves a range of concentrated risks that may impact client portfolios more significantly than long-term investment approaches.

These include, but are not limited to:

market risk, market timing risk, volatility risk, margin and leverage risk, futures trading risk, liquidity risk, execution risk, signal degradation, options strategy risk (including assignment and implied volatility shifts), and behavioral risk arising from emotional responses to drawdowns or trading volatility. – these are all generally previously defined but reiterated for transparency and disclosure

In addition to the risks already discussed in this section, Tactical Portfolio Management may also involve the following:

- xljvi) Tax Inefficiency Risk: Tactical strategies may generate short-term capital gains, which are typically taxed at higher ordinary income rates. Clients should understand that high turnover can result in less favorable after-tax outcomes compared to longer-term investment strategies.*
- xljvii) High Turnover / Cost Amplification Risk: Frequent trading may lead to increased transaction costs, including commissions, bid/ask spread loss, and slippage. Over time, these costs can erode net performance, especially in volatile or range-bound markets.*

Clients are encouraged to evaluate their risk tolerance and financial capacity to absorb short-term losses before selecting this service.

C. Risks of Specific Securities Utilized

Mutual Funds:

Investing in mutual funds carries the risk of capital loss and you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond “fixed income” nature (lower risk) or stock “equity” nature.

Equities (Public Stocks):

Investing in publicly traded equities involves market risk, business risk, and sector-specific risks. The value of equity securities may fluctuate in response to company-specific events such as earnings releases, changes in management, industry developments, or general economic conditions. Clients should understand that equity investments can experience substantial price volatility and the potential for significant losses.

Fixed Income:

Investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

Exchange-Traded Funds (ETFs):

An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in some products, increasing complexity, conflicts of interest, and the possibility of inadequate regulatory compliance. Risks in investing in ETFs include trading risks, liquidity risks, shutdown risks, changes in authorized participants, and non-participation of authorized participants. There are also risks that the trading price may differ significantly from the indicative net asset value (iNAV) or that the ETF may disassociate from the index it tracks.

Trading risks include the potential costs associated with frequent trading, which can offset the low fees that are typically a feature of ETFs. Timing the market using ETFs can also be difficult, even for professional fund managers. Liquidity risks involve the fact that not all ETFs have the same level of underlying liquidity, and some ETFs may close or become illiquid under certain market conditions.

ETFs that target specific sectors, regions, or narrow universes may face additional volatility and risks associated with concentration. ETFs that employ derivatives, leverage, or complex investment strategies carry additional risks.

The performance of an ETF may differ from its benchmark index due to fees, expenses, and tracking errors. Additionally, an ETF may trade at a premium or discount to its net asset value (NAV), and liquidity may vary widely across different ETF products. Each ETF has a unique risk profile that should be carefully reviewed in its prospectus or offering documents before investing.

Options Contracts:

Options are derivative securities that derive their value from an underlying asset, such as a stock or an index. Investing in options can be highly speculative and carries the risk of losing the entire amount invested (the premium paid) in a short period. In addition to the risk of losing the entire investment, options involve leverage risk, time decay risk, volatility risk, liquidity risk, and sensitivity to market conditions. TRADESPRO's options strategies are focused on defined-risk structures such as debit spreads, credit spreads, iron condors, calendar spreads, and butterflies, where the maximum potential loss is generally known at trade initiation. However, clients should be aware that executing certain options strategies, particularly those involving short positions or spreads, may expose them to assignment risk. Short put positions may be assigned, resulting in ownership of the underlying stock, which can create additional downside exposure beyond the initial premium structure. Clients should ensure they understand these risks and obtain the appropriate level of trading approval from their brokerage or custodian before engaging in options strategies.

Alternative Investment Risk:

Alternative investments may include private equity, hedge funds, private real estate, venture capital, private debt, and other privately offered securities. Additionally, Digital Assets including Cryptocurrencies fall under the umbrella of Alternative Investments as defined by regulatory agencies.

These Alternative Investments often involve limited liquidity, long holding periods, limited transparency, complex fee structures, and reduced regulatory oversight compared to publicly traded securities. Valuations of alternative investments may be difficult to determine and may fluctuate significantly due to market conditions or appraisal methodologies. Investors should understand that alternative investments may carry substantial risk, including the potential for partial or complete loss of invested capital, and may not be appropriate for all clients.

Cryptoassets and Related Securities:

Cryptoassets are a relatively new and evolving asset class that includes cryptocurrencies such as Bitcoin and Ethereum, decentralized finance (DeFi) protocols, and non-fungible tokens (NFTs). Historically, cryptoassets have exhibited significantly greater volatility and price swings compared to traditional investments like stocks, ETFs, and mutual funds. In addition to market risk, cryptoassets are subject to unique risks, including custodial risks, self-custody risks, password and seed phrase management issues, cybersecurity threats, regulatory uncertainty, liquidity risks, and the risk of permanent loss of assets.

TRADESPRO may provide educational services regarding cryptoassets and may also invest client portfolios in publicly traded vehicles that seek exposure to cryptoassets, such as exchange-traded funds (ETFs), trusts, or other related securities. TRADESPRO may also assist clients by providing general guidance on how to access cryptoassets through well-known exchanges, custodians, or wallet solutions, such as Coinbase, Binance, or similar platforms. However, TRADESPRO does not receive compensation from any exchange or platform and does not directly custody or transact individual cryptoasset holdings such as Bitcoin or Ethereum itself.

Investing in cryptoasset-related securities and engaging with cryptoassets independently carries unique risks, including extreme price volatility, regulatory uncertainty, cybersecurity threats, liquidity risks, custody and self-custody risks, and operational risks associated with the underlying crypto markets. Clients should be prepared for significant volatility and should consider these investments and activities within the context of their overall risk tolerance and financial situation.

General Risk Disclosure:

Clients must recognize that investing in any security involves the risk of loss of principal. There can be no assurance that any investment strategy will achieve its intended objectives, and past performance is not indicative of future results. Clients should carefully consider their individual risk tolerance, financial situation, and investment objectives before engaging in any investment strategy with TRADESPRO LLC.

Item 9: Disciplinary Information

TRADESPRO LLC and its management personnel have not been involved in any legal or disciplinary events that are material to a client's or prospective client's evaluation of the firm or the integrity of its management.

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

TRADESPRO LLC has no information applicable to this Item.

Item 10: Other Financial Industry Activities and Affiliations

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

TRADESPRO LLC and its management personnel are not registered and have no pending applications to become a broker-dealer or a broker-dealer representative.

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

TRADESPRO LLC and its management personnel are not registered and have no pending applications to become a futures commission merchant, commodity pool operator, commodity trading advisor, or associated person of the foregoing entities.

C. Material Relationships or Conflicts of Interest

TRADESPRO LLC does not have material relationships or arrangements with any related persons, financial industry participants, or other entities that would present a conflict of interest with its clients.

TRADESPRO LLC does not offer insurance products, annuities, or private placements.

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

TRADESPRO LLC does not select other investment advisers or managers for its clients and does not receive compensation, directly or indirectly, from any third parties for recommending or selecting other advisers.

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

A. Code of Ethics

TRADESPRO LLC maintains a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions.

A copy of TRADESPRO's Code of Ethics is available to any client or prospective client upon request.

Outside Business Activities: TRADESPRO LLC's management personnel engage periodically in engineering and operations consulting activities, which comprise less than 1% of their time. These activities are not considered material to the firm's advisory services or present conflicts of interest with its clients.

B. Recommendations Involving Material Financial Interests

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

C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of TRADESPRO LLC may buy or sell securities for their own accounts that they also recommend to clients. This may create a conflict of interest. TRADESPRO LLC will always document any transactions that could be construed as conflicts of interest and will ensure that trading is conducted in a manner that does not disadvantage client accounts.

Additionally, TRADESPRO LLC's management personnel may engage in personal trading of futures contracts for their own accounts. These activities are conducted separately and independently from client advisory services and do not present a material conflict of interest with client accounts.

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

TRADESPRO LLC and its representatives may buy or sell securities for themselves at or around the same time they buy or sell securities for clients. This may create a conflict of interest; however, TRADESPRO LLC will ensure that clients are not systematically disadvantaged by personal trading activities.

Item 12: Brokerage Practices

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

TRADESPRO LLC may suggest custodians and broker-dealers with which the firm has familiarity and operational experience. Clients should be aware that they may not always receive the lowest possible commission or fee, but TRADESPRO LLC considers factors such as execution quality, market access, technological resources, and client service when suggesting custodians and broker-dealers.

TRADESPRO LLC may suggest the use of custodians and broker-dealers with which the firm has operational familiarity. For example, TRADESPRO LLC may suggest Charles Schwab Institutional due to its strong integration with trading platforms such as Thinkorswim and its overall client service quality. However, clients are not required to use a custodian suggested by TRADESPRO LLC and are free to select a custodian of their choice.

Research and Other Soft-Dollar Benefits

TradesPro LLC does not receive soft dollar benefits or other special arrangements from custodians or brokerage platforms. The firm selects custodians and brokerage providers based on factors such as platform capabilities, execution quality, technology integrations, client service, and operational support.

In the ordinary course of business, TradesPro may receive access to standard services offered broadly to all advisory firms using the platform. These may include trading systems, portfolio reporting tools, billing features, educational materials, or account servicing tools. These services are not tied to client referrals or trading volume and are not considered soft dollar arrangements under regulatory definitions.

Brokerage for Client Referrals

TRADESPRO LLC does not receive client referrals or other compensation from any broker-dealer or third party in exchange for recommending the use of their services.

Clients Directing Which Broker/Dealer/Custodian to Use

TRADESPRO LLC may suggest that clients establish brokerage accounts with custodians with which the firm has operational familiarity, but clients are not required to use a specific custodian and may select a custodian or broker-dealer of their choice, subject to operational capabilities for executing advisory services.

B. Aggregating (Block) Trading for Multiple Client Accounts

Order Aggregation Policy

Order aggregation is a process by which an investment adviser combines multiple client orders for the same security into a single block trade. This can promote more efficient execution, consistent pricing, and potentially lower transaction costs when supported by appropriate trading systems and allocation procedures.

TRADESPRO LLC may aggregate orders and execute block trades for multiple client accounts when the firm determines that block execution is appropriate and consistent with its duty to seek fair and equitable treatment among participating accounts.

TRADESPRO LLC does not aggregate every trade across all accounts. In certain circumstances, block execution may not be appropriate due to strategy differences, account size, available cash, position limits, investment restrictions, timing differences, security type, liquidity, custodial or platform constraints, or other practical considerations.

When TRADESPRO LLC aggregates orders, the firm generally seeks to allocate executions on a pro rata basis according to relative account size. However, strict pro rata allocation may not always be practical or appropriate in light of the nature of certain strategies, including active or options-based strategies that may involve scaling, partial fills, differing account capacities, contract sizing constraints, timing differences, liquidity conditions, or other account-specific considerations. In such cases, TRADESPRO LLC will allocate executions in a manner it believes is fair and reasonable under the circumstances and designed not to systematically favor or disadvantage any participating account over time.

Average pricing may be used where supported by the custodian or platform, but execution prices, timing, and participation levels may vary depending on market conditions and account-specific factors. Clients should understand that not all accounts will participate in every aggregated trade and that separately executed accounts may receive different prices or timing.

After an aggregated entry, subsequent management of the position, including partial exits, scaling, or the decision to retain a residual position, may differ across participating accounts based on account-specific considerations, trade size, suitability, and practical execution factors.

Item 13: Review of Accounts

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

Client accounts are reviewed on an ongoing basis by TRADESPRO LLC's Principal and Investment Adviser Representative, Robert Hudak. Reviews are conducted to ensure that the portfolio remains consistent with the client's stated investment objectives, risk tolerance, time horizon, and any updates in personal financial circumstances. For clients receiving portfolio management services, accounts are typically reviewed at least quarterly, or more frequently if market conditions warrant.

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

Non-scheduled reviews may be triggered by a variety of events, including but not limited to:

- A significant market event,
- A change in the client's financial situation,
- A change in the client's investment objectives or risk tolerance,
- A request by the client,
- The addition or removal of account assets.

C. Content and Frequency of Regular Reports Provided to Clients

Clients receiving ongoing portfolio management services will receive regular account statements from their custodian at least quarterly, which include a summary of assets, transactions, and account values. TRADESPRO LLC may also provide clients with performance reports or other updates periodically as part of its advisory relationship, but clients are encouraged to rely primarily on statements provided directly by the custodian for official account balances and activity.

Item 14: Client Referrals and Other Compensation

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

TRADESPRO LLC does not receive any economic benefits, sales awards, or other forms of compensation directly or indirectly from third parties in exchange for providing investment advice or referring clients.

The Firm may receive incidental benefits from custodians or broker-dealers, including access to trading platforms, research, technology support, practice management tools, compliance resources, or educational materials. These services are made available broadly to investment advisers that maintain institutional relationships with the custodians, are not provided in exchange for client referrals, and do not affect the Firm's selection of custodians or broker-dealers. These benefits do not create a conflict of interest with clients nor do they influence the Firm's recommendations.

B. Compensation to Non-Advisory Personnel for Client Referrals

TRADESPRO LLC does not directly or indirectly compensate any person or entity, whether internal or external to the firm, for client referrals. The Firm does not engage in paid referral arrangements, solicitor programs, or similar compensation structures.

Item 15: Custody

TRADESPRO LLC does not maintain custody of client funds or securities.

Client assets are held at qualified custodians, which are generally broker-dealer firms unaffiliated with TRADESPRO LLC.

Clients will receive account statements directly from the qualified custodian at least quarterly. These statements will reflect all holdings, account balances, and transaction activity. TRADESPRO LLC encourages clients to carefully review custodial statements and to compare them to any reports provided by the firm, if applicable.

If discrepancies are noted, clients should immediately contact both TRADESPRO LLC and the custodian.

Item 16: Investment Discretion

TRADESPRO LLC provides investment advisory services on both a discretionary and non-discretionary basis.

For discretionary accounts, clients authorize TRADESPRO LLC to make investment decisions and place trades directly in their accounts without requiring prior approval for each transaction. In order for TRADESPRO LLC to act on a client's behalf and execute trades directly, the client must complete and sign a form with their custodian (brokerage firm) that grants Limited Trading Authorization (LTA) or similar permissions. Limited Trading Authorization allows TRADESPRO LLC to buy and sell securities inside the client's account but does not allow TRADESPRO LLC to withdraw funds, transfer money, or take custody of assets.

Clients who do not wish to grant Limited Trading Authorization may still work with TRADESPRO LLC under a non-discretionary relationship, where all trade recommendations are provided to the client and no trades are executed without the client's explicit consent. While granting Limited Trading Authorization is not mandatory, it is recommended for clients who prefer more efficient management of their accounts.

TRADESPRO LLC's authority is always limited to trading activity only and is exercised in accordance with the client's stated investment objectives, risk tolerance, and any restrictions the client may impose.

Item 17: Voting Client Securities (Proxy Voting)

TRADESPRO LLC does not vote on client securities, including proxies.

Clients will receive proxies and other solicitations directly from their custodian, broker-dealer, or the issuing company. Clients retain the exclusive right and responsibility to vote proxies, and TRADESPRO LLC does not advise or act on behalf of clients in the voting of proxies.

Clients should direct all proxy-related questions directly to the issuer or their custodian. If requested, TRADESPRO LLC may provide limited assistance or clarification on general proxy voting procedures but will not render advice on specific proxy matters.

Item 18: Financial Information

A. Balance Sheet

TRADESPRO LLC does not require or solicit prepayment of more than \$500 per client, six months or more in advance. Therefore, TRADESPRO LLC is not required to include a balance sheet with this brochure.

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

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

C. Bankruptcy Petitions in Previous Ten Years

TRADESPRO LLC has not been the subject of a bankruptcy petition at any time during the past ten years.

Item 19: Requirements for State-Registered Advisers

A. Principal Executive Officers and Management Persons; Their Formal Education and Business Background

TRADESPRO LLC currently has one principal management person: Robert Hudak.

Detailed information regarding Robert Hudak's education and business background is provided in TRADESPRO LLC's Form ADV Part 2B brochure supplement.

B. Other Businesses in Which This Advisory Firm or Its Personnel Are Engaged and Time Spent on Those Activities

Robert Hudak engages periodically in engineering and operations consulting activities, comprising less than 10% of his time. These activities are not considered material to TRADESPRO LLC's advisory services or present any conflicts of interest.

C. Calculation of Performance-Based Fees and Degree of Risk to Clients

TRADESPRO LLC may charge performance-based fees to qualified clients where permissible under applicable regulations. Performance-based fees are structured to comply with the requirements of Rule 205-3 under the Investment Advisers Act of 1940 and applicable state law. TRADESPRO LLC only charges such fees after executing a written agreement with the client, and such arrangements involve risks including potential incentives for the adviser to take greater investment risks.

D. Material Disciplinary Disclosures for Management Persons of This Firm

Robert Hudak (CRD#8079535) has no disciplinary history to disclose.

E. Material Relationships That Management Persons Have with Issuers of Securities (If Any)

Robert Hudak and TRADESPRO LLC have no material relationships with issuers of securities.