



MOA ADVISORY & FINANCIAL SERVICES CO.

Form ADV Part 2A – Disclosure Brochure

**Effective: October 19, 2020,
Revised: June 09, 2023, Revised: July 17, 2023**

This Disclosure Brochure provides information about the qualifications and business practices of MOA Advisory & Financial Services Co (“MOA Advisory”). If you have any questions about the contents of this Disclosure Brochure, please contact us at (224) 255-7846 or by email at michaelakinosho@moaadvisory.com.

MOA Advisory is a Registered Investment Advisor with the State of Illinois. The information in this Disclosure Brochure has not been approved or verified by the State of Illinois or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information about MOA Advisory to assist you in determining whether to retain the Advisor.

Additional information about MOA Advisory and its advisory persons are available on the SEC’s website at www.adviserinfo.sec.gov.

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Services Co CRD No: 309679
1654 Nebraska Drive
Elk Grove Village, IL 60007
Phone: (224) 255-7846**

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Item 2 - Material Changes

Form ADV 2 is divided into two parts: *Part 2A and Part 2B*. *Part 2A* (the “Disclosure Brochure”) provides information about a variety of topics relating to an Advisor’s business practices and conflicts of interest. *Part 2B* (the “Brochure Supplement”) provides information about advisory personnel of MOA Advisory.

MOA Advisory believes that communication and transparency are the foundation of our relationship and continually strive to provide you with complete and accurate information at all times. We encourage all current and prospective investors to read this Disclosure Brochure and discuss any questions you may have with us. And of course, we always welcome your feedback.

Material Changes

There are no material changes since the last filing and distribution of this Disclosure Brochure. Assets under management have been updated. Please see Item 4.E.

Future Changes

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of MOA Advisory.

At any time, you may view the current Disclosure Brochure on-line at the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

To review the firm information for MOA Advisory:

- Click **Investment Advisor Search** in the left navigation menu.
- Select the option for **Investment Advisor Firm** and enter **309679** (our firm’s CRD number) in the field labeled “Firm IARD/CRD Number”.
- This will provide access to Form ADV Part 1 and Part 2.
- Item 11 of the ADV Part 1 lists legal and disciplinary questions regarding the Advisor.
- In the left navigation menu, Form ADV Part 2 is located near the bottom.

You may also request a copy of this Disclosure Brochure at any time, by contacting us at (224) 255-7846 or by email at michaelakinoshomoaadvisory.com.

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Item 4 - Advisory Services

A. Firm Information

MOA Advisory & Financial Services Co ("MOA Advisory" or the "Advisor") is a Registered Investment Advisor with the State of Illinois, which is organized as an S-Corporation under the laws of the State of Illinois. MOA Advisory was founded in 2018 and is owned and operated by Michael Akinosho. This Disclosure Brochure provides information regarding the qualifications, business practices, and the investment & financial planning advisory services provided by MOA Advisory.

Our goal at MOA Advisory is to help our Clients grow their wealth over time regardless of the market environment. As a firm that also believes in the importance of goal-based financial planning in connection with investment management, we feel strongly about being able to offer Clients of all levels of net worth a dynamic investment solution that can help them excel.

B. Advisory Services Offered

MOA Advisory offers investment advisory services to individuals, families, profit-sharing plans, trusts, estates, investment companies, pooled investment vehicles, and small businesses in Illinois and other states (each referred to as a "Client").

Account Portfolio Management

MOA Advisory provides customized investment advisory solutions for its Clients. This is achieved through continuous personal Client contact and interaction while providing discretionary investment management and consulting services. MOA Advisory works with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation to create a portfolio allocation. MOA Advisory will then construct a portfolio, consisting of exchange-traded funds ("ETFs"), mutual funds, and individual stocks and bonds to achieve the Client's investment goals. The Advisor may also utilize other security types as necessary to meet the needs of its Clients.

At MOA Advisory, our investment philosophy is based on the belief that markets are efficient over the long-term but can remain relatively inefficient and irrational over the shorter term. At the core of our investment management approach is a tactically managed Asset Allocation strategy that seeks to capture market inefficiencies in various asset classes over time while maintaining a below-market risk posture. This provides Clients with a longer-term core solution which is aligned with our belief that markets are efficient and rational over longer periods of time. However, in aligning with our belief that markets can operate away from the fundamentals over the shorter term, MOA Advisory manages a number of technically based strategies that are designed to capitalize on trends that we see developing in various markets/asset classes. The goal of these strategies is to limit losses in unfavorable market environments while attempting to outperform the broad market over longer periods of time. The firm employs technical analysis and proprietary rule-based modeling in managing these accounts (See Item 8 for details on analysis methods).

MOA Advisory will construct, implement, and monitor the portfolio to ensure it meets the goals, objectives, circumstances, and risk tolerance agreed to by the Client. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to the acceptance by the Advisor. MOA Advisory may periodically rebalance or adjust client accounts under its management. If the client experiences any significant changes to his/her financial or personal circumstances, the Client must notify the Firm so that the Firm can consider such information in managing the Client's investments.

MOA Advisory evaluates and selects ETFs and mutual funds for inclusion in Client portfolios only after applying their internal due diligence process. MOA Advisory may recommend, on occasion, redistributing investment allocations to diversify the portfolio. MOA Advisory may recommend specific positions to increase

sector or asset class weightings. The Advisor may recommend employing cash positions as a possible hedge against market movement, which may adversely affect the portfolio. MOA Advisory may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position[s] in the portfolio, change in risk tolerance of Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client's risk tolerance.

Prior to rendering investment advisory services, MOA Advisory will ascertain, in conjunction with the Client, the Client's financial situation, risk tolerance, and investment objective[s].

MOA Advisory will provide investment advisory services and portfolio management services and will not provide securities custodial or other administrative services. At no time will MOA Advisory accept or maintain custody of a Client's funds or securities. All Client assets will be managed within their designated brokerage account or pension account, pursuant to the Client Investment Advisory Agreement.

Financial Planning and Consulting Services

MOA Advisory will typically provide a variety of financial planning services to individuals, families, small businesses, and other Clients, pursuant to a written Financial Planning or Consulting Agreement. Services are offered in several areas of a Client's financial situation, depending on their goals, objectives, and financial situation. MOA Advisory and the Client will discuss and agree upon the specific topics to be covered by the financial plan. Such topics may include investment planning, retirement planning, tax planning, insurance planning, estate planning, or business planning. MOA Advisory will conduct one or more meetings (in person if possible, otherwise via telephone or video conference) with the Client in order to understand the Client's current financial situation, financial goals, specific issues or questions, and topics to be covered by the financial plan.

A financial plan developed for or financial consultation rendered to the Client will usually include general recommendations for a course of activity or specific actions to be taken by the Client. For example, recommendations may be made that the Client start or revise their investment programs, commence, or alter retirement savings, establish education savings and/or charitable giving programs. MOA Advisory may also refer Clients to an accountant, attorney, or other specialist, as appropriate for their unique situation. For certain financial planning engagements, the Advisor will provide a written summary of Client's financial situation, observations, and recommendations. For consulting or ad-hoc engagements, the Advisor may not provide a written summary. Plans or consultations are typically completed within six months of contract date, assuming all information and documents requested are provided promptly.

Financial planning and consulting recommendations may pose a potential conflict between the interests of the Advisor and the interests of the Client. Clients are not obligated to implement any recommendations made by the Advisor or maintain an ongoing relationship with the Advisor. If the Client elects to act on any of the recommendations made by the Advisor, the Client is under no obligation to affect the transaction through the Advisor.

C. Client Account Management

Prior to engaging MOA Advisory to provide investment advisory services, each Client is required to enter into an Investment Advisory Agreement with the Advisor that defines the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

- Establishing an Investment Policy Statement – MOA Advisory, in connection with the Client, may develop a statement that summarizes the Client's investment goals and objectives along with the broad strategy[ies] to be employed to meet the objectives. An Investment Policy Statement generally includes specific information on the Client's stated goals, time horizon for achieving the goals, investment strategies, Client risk tolerance and any restrictions imposed by the Client.

- Asset Allocation – MOA Advisory will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation, and tolerance for risk for each Client.
- Portfolio Construction – MOA Advisory will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – MOA Advisory will provide investment management and ongoing oversight of the Client's portfolio and overall account.

D. Wrap Fee Programs

MOA Advisory does not manage or place Client assets into a wrap fee program. Investment management services are provided directly by MOA Advisory.

E. Assets Under Management

As of October 19, 2020, the most recent date for which such calculations are provided pursuant to securities regulations, MOA Advisory manages the following assets:

Assets Under Management	Assets
Discretionary Assets	\$0.00
Non-Discretionary Assets	\$0.00
Total	\$0.00

Clients may request more current information at any time by contacting the Advisor.

Item 5 - Fees and Compensation

The following paragraphs detail the fee structure and compensation methodology for investment management. Each Client shall sign an Investment Advisory Agreement that details the responsibilities of MOA Advisory and the Client.

A. Fees for Advisory Services

Account Portfolio Management

Investment Advisory Fees are paid quarterly in advance pursuant to the terms of the Investment Advisory Agreement. The period commences with the effective date of the Investment Advisory Agreement and continues on a pro-rata basis through the first month. The quarterly period includes this partial month and the next two months. Investment Advisory Fees are based on the market value of assets under management at the end of each quarterly period. Investment Advisory Fees range from 1.00% to 2.50% depending on the size and complexity of the Client relationship. Relationships with multiple objectives, specific reporting requirements, portfolio restrictions and other complexities may be charged a higher fee.

Investment Advisory Fees in the first or last quarter of service may be prorated to the inception date of the account to the end of the quarterly period. MOA Advisory will typically pro rate fees for accounts where the investment management agreement is initiated or terminated on a date creating less than a full quarter of investment management for either the initial or final month of the Agreement, and fees not earned may be refunded to the Client. MOA Advisory reserves the right not to pro rate its fees. Fees may be negotiable at the discretion of the Advisor. The Client's fees will take into consideration the aggregate assets under management with Advisor. All securities held in accounts managed by MOA Advisory will be independently valued by the designated Custodian. MOA Advisory will not have the authority or responsibility to value portfolio securities.

Financial Planning and Consulting Services

MOA Advisory offers financial planning or consulting services on an annual basis ranging from \$600 to \$5,000, which may be negotiable depending on the nature and complexity of each Client's circumstances. An estimate for total hours will be determined prior to establishing the advisory relationship.

The Advisor's fee is exclusive of, and in addition to brokerage commissions, transaction fees, and other related costs and expenses, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs. The hourly fees are determined after considering many factors, such as the level and scope of the services.

B. Fee Billing

Account Portfolio Management

Investment Advisory Fees will be automatically deducted from the Client Account by the Custodian. The Advisor shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client Account at the respective billing date. The amount due is calculated by applying the quarterly rate (annual rate divided by 4) to the total assets under management with MOA Advisory at the end of each quarterly period. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the Investment Advisory Fee.

Clients provide written authorization permitting MOA Advisory to be paid directly from their accounts held by the Custodian as part of the Investment Advisory Agreement and separate account forms provided by the Custodian.

Financial Planning and Consulting Services

As noted above, financial planning and consulting fee are invoiced by the Advisor and are due upon receipt.

C. Other Fees and Expenses

Clients may incur certain fees or charges imposed by third-parties, other than MOA Advisory, in connection with investment made on behalf of the Client's account[s]. The Client is responsible for all custodial and securities execution fees charged by the custodian and executing broker-dealer. The Investment Advisory Fee charged by MOA Advisory is separate and distinct from these custodian and execution fees. In addition, all fees paid to MOA Advisory for investment advisory services are separate and distinct from the expenses charged by mutual funds and exchange-traded funds to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage, and account reporting), and a possible distribution fee.

A Client could invest in these products directly, without the services of MOA Advisory, but would not receive the services provided by MOA Advisory which are designed, among other things, to assist the Client in determining which products or services are most appropriate to each Client's financial condition and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by MOA Advisory to fully understand the total fees to be paid.

D. Advance Payment of Fees and Termination

Account Portfolio Management

MOA Advisory is compensated for its services in advance the quarter in which investment advisory services are rendered. Clients may request to terminate their Investment Advisory Agreement with MOA Advisory, in whole or in part, by providing thirty (30) days advance written notice. The Client shall be responsible for Investment Advisory Fees up to and including the effective date of termination. Upon the effective date of termination, the Advisor may refund any unearned, prepaid Investment Advisory Fees from the effective date of termination to the end of the quarterly period. MOA Advisory will typically pro rate fees for accounts where the

investment management agreement is terminated on a date creating less than a full quarter of investment management for either the initial or final month of the Agreement, and fees not earned may be refunded to the Client. MOA Advisory reserves the right not to pro rate its fees. The Client's Investment Advisory Agreement with the Advisor is non-transferable without Client's written approval.

Financial Planning and Consulting Services

In the event that a Client should wish to cancel the financial planning agreement under which any plan is being created, the Client shall be billed for actual hours logged on the planning project times the agreed upon rate at listed in the Financial Planning Agreement. Any surplus in the Advisor's possession as the result of collecting a deposit at the time of signing the financial planning agreement will be returned to the Client within 5 business days of cancellation. Either party may terminate a planning or consulting agreement at any time by providing written notice to the other party within five (5) days of signing the Advisor's financial planning or consulting agreement. The Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Refunds will be given on a pro-rata basis.

E. Compensation for Sales of Securities

MOA Advisory does not buy or sell securities and does not receive any compensation for securities transactions in any Client account, other than the Investment Advisory Fees noted above.

Item 6 - Performance-Based Fees

MOA Advisory does not charge performance-based fees for its investment advisory services. The fees charged by MOA Advisory are as described in Item 5 - Fees and Compensation above and are not based upon the capital appreciation of the funds or securities held by any Client. MOA Advisory does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

Item 7 - Types of Clients

MOA Advisory provides investment advisory services to the following types of Clients:

- Individuals, Personal Trusts and Estates - private investors, investing their personal assets
- Pension and Profit-Sharing Plans - retirement plan sponsors or company plans
- Corporations and Businesses - taxable business entities, investing cash reserves

The relative percentage each type of Client is available on MOA Advisory's Form ADV Part 1. These percentages will change over time. MOA Advisory generally requires a minimum account size of \$5,000 to effectively implement its investment process.

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

A. Methods of Analysis

MOA Advisory employs both fundamental and technical analysis methods in developing investment strategies for its Clients. Research and analysis from MOA Advisory are derived from numerous sources, including financial media companies, third-party research materials, Internet sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others.

As noted above, MOA Advisory generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. MOA Advisory will typically hold all or a portion of a security for more than a year but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, MOA Advisory may also buy and sell positions that are more short-term in nature, depending on the

goals of the Client and/or the fundamentals of the security, sector, or asset class.

B. Risk of Loss

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. MOA Advisory will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

MOA Advisory primarily employs investment strategies that do not involve any significant or unusual risk other than domestic equity and international market risks. The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process.

MOA Advisory may use margin in Client accounts to manage the timing of purchases and sales, as appropriate. MOA Advisory may employ options strategies to hedge or gain additional exposure to a particular asset class or sector. MOA Advisory's investment strategy encompasses active trading in concentrated portfolios. Following are some of the risks associated with Options, Margin and Short-Sale transactions:

Options Contracts

Investments in options contracts have the risk of losing value in a relatively short period of time. Option contracts are leveraged instruments that allow the holder of a single contract to control many shares of an underlying stock. This leverage can compound gains or losses.

Margin Borrowings

The use of short-term margin borrowings may result in certain additional risks to a Client. For example, if securities pledged to brokers to secure a Client's margin accounts decline in value, the Client could be subject to a "margin call", pursuant to which it must either deposit additional funds with the broker or be the subject of mandatory liquidation of the pledged securities to compensate for the decline in value.

Short Sales

A short sale involves the sale of a security that the Client does not own in the hope of purchasing the same security later at a lower price. To make delivery to the buyer, the Client must borrow the security and is obligated to return the security to the lender, which is accomplished by a later purchase of the security. The Client realizes a profit or a loss as a result of a short sale if the price of the security decreases or increases respectively between the date of the short sale and the date on which the Client covers its short position, i.e., purchases the security to replace the borrowed security. A short sale involves the theoretically unlimited risk of an increase in the market price of the security that would result in a theoretically unlimited loss.

Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor. For more information on our investment management services, please contact us at (224) 255-7846 or via email at michaelakinosh@moaadvisory.com.

Item 9 – Disciplinary Information

There are no legal, regulatory, or disciplinary events involving MOA Advisory or any of its employees. MOA Advisory and its advisory personnel value the trust you place in us. As we advise all Clients, we encourage you to perform the requisite due diligence on any advisor or service provider in which you partner. Our backgrounds are on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov. To review the firm information contained in ADV Part 1, select the option for Investment Adviser Firm and enter **309679** in the field labeled “Firm IARD/CRD Number”. This will provide access to Form ADV Parts 1 and 2. Item 11 of the ADV Part 1 lists legal and disciplinary questions.

In addition, you may also obtain information relating to the disciplinary history of any investment advisor representative conducting business in Illinois by contacting the Illinois Department of Financial & Professional Regulation website at <https://www.idfpr.com/> and phone at (888) 473-4858.

Item 10 – Other Financial Activities and Affiliations

Tax and Accounting Practice within MOA Advisory

Michael Akinosho is the sole owner of MOA Advisory. Mr. Akinosho provides tax return preparation, tax issues consulting and tax planning and accounting services. Clients who receive services from MOA Advisory’s Tax Practice may not be clients of Investment Advising, and Financial Planning services and vice versa.

Broker-Dealer Affiliation

No broker affiliation(s)

Item 11 – Code of Ethics, Participation in Client Transactions and Personal Trading

A. Code of Ethics

MOA Advisory has implemented a Code of Ethics that defines our fiduciary commitment to each Client. This Code of Ethics applies to all persons associated with MOA Advisory. The Code of Ethics was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. MOA Advisory and its personnel owe a duty of loyalty, fairness, and good faith towards each Client. It is the obligation of MOA Advisory associates to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code.

The Code of Ethics covers a range of topics that may include; general ethical principles, reporting personal securities trading, exceptions to reporting securities trading, reportable securities, initial public offerings and private placements, reporting ethical violations, distribution of the Code of Ethics, review and enforcement processes, amendments to Form ADV and supervisory procedures. MOA Advisory has written its Code of Ethics to meet and exceed regulatory standards. To request a copy of our Code of Ethics, please contact us at (224) 255-7846 or via email at michaelakinosho@moaadvisory.com.

B. Personal Trading and Conflicts of Interest

MOA Advisory allows our employees to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities, we recommend (purchase or sell) to you presents a potential conflict of interest that, as fiduciaries, we must disclose to you and mitigate through policies and procedures. As noted above, we have adopted, consistent with Section 204A of the Investment Advisers Act of 1940, a Code of Ethics, which addresses insider trading (material non-public information controls) and personal

securities reporting procedures. We have also adopted written policies and procedures to detect the misuse of material, non-public information. We may have an interest or position in certain securities, which may also be recommended to you.

At no time, will MOA Advisory or any associated person of MOA Advisory, transact in any security to the detriment of any Client.

Item 12 - Brokerage Practices

A. Recommendation of Custodian[s]

MOA Advisory does not have discretionary authority to select the broker-dealer/custodian for custodial and execution services or the administrator for defined contribution accounts. The Client will select the broker-dealer or custodian (herein the "custodian") to safeguard Client assets and authorize MOA Advisory to direct trades to this custodian as agreed in the Investment Advisory Agreement. Further, MOA Advisory does not have the discretionary authority to negotiate commissions on behalf of our Clients on a trade-by-trade basis.

Where MOA Advisory does not exercise discretion over the selection of the custodian, it may recommend the custodian[s] to Clients for execution and/or custodial services. Clients are not obligated to use the recommended custodian and will not incur any extra fee or cost associated with using a broker not recommended by MOA Advisory.

MOA Advisory may recommend a custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, and location of the custodian's offices. MOA Advisory does not receive research services, other products, or compensation as a result of recommending a particular broker that may result in the Client paying higher commissions than those obtainable through other brokers.

The Firm may obtain discretionary authority with respect to selection of broker-dealers, which execute transactions for a client's account. While it is anticipated that transactions may be executed through Interactive Brokers "IBKR", the Firm may use another broker-dealer to execute transactions if the Firm believes this would be in the best interests of the client. The Firm's policy with respect to the selection of brokers and payment of commissions seeks best execution while taking into account such factors as price, commission, size of order, difficulty of execution, and the degree of skill required by the broker-dealer. MOA Advisory also recommends that Clients establish accounts with the TDA to maintain custody of Clients' assets and to effect trades for their accounts. Although the Firm may recommend that Clients establish accounts at TDA, it is the Client's decision to custody assets with TDA.

MOA Advisory is independently owned and operated and not affiliated with TDA.

Following are additional details regarding the brokerage practices of the Advisor:

- 1. *Soft Dollars*** - Soft dollars are revenue programs offered by broker-dealers whereby an advisor enters into an agreement to place security trades with the broker in exchange for research and other services. **MOA Advisory does not participate in soft dollar programs sponsored or offered by any broker-dealer.**
- 2. *Brokerage Referrals*** - MOA Advisory does not receive any compensation from any third party in connection with the recommendation for establishing a brokerage account.
- 3. *Directed Brokerage*** - All Clients are serviced on a "directed brokerage basis", where MOA Advisory will place trades within the established account[s] at the custodian designated by the Client. Further, all Client accounts are traded within their respective brokerage account[s]. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor's own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client's account[s]). In selecting the custodian, MOA Advisory will not be obligated to select competitive bids on securities transactions and does

not have an obligation to seek the lowest available transaction costs. These costs are determined by the designated custodian.

B. Aggregating and Allocating Trades

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the broker. MOA Advisory will execute its transactions through an unaffiliated broker-dealer selected by the Client. MOA Advisory may aggregate orders in a block trade or trades when securities are purchased or sold through the same broker-dealer for multiple (discretionary) accounts. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage particular Client accounts.

Item 13 - Review of Accounts

A. Frequency of Reviews

Accounts are monitored on a regular and continuous basis by Mr. Michael Akinosho. Formal reviews are generally conducted at least annually or more or less frequently depending on the needs of the Client.

B. Causes for Reviews

In addition to the investment monitoring noted in Item 13.A., each Client account shall be reviewed at least annually. Reviews may be conducted more or less frequently at the Client's request. Accounts may be reviewed because of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account. The Client is encouraged to notify MOA Advisory if changes occur in his/her personal financial situation that might adversely affect his/her investment plan. Additional reviews may be triggered by material market, economic or political events.

C. Review Reports

The Client will receive brokerage statements no less than quarterly from the trustee or custodian. These brokerage statements are sent directly from the custodian to the Client. The Client may also establish electronic access to the custodian's website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client's account[s]. The Advisor may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

Item 14 - Client Referrals and Other Compensation

A. Compensation Received by MOA Advisory

MOA Advisory is a registered investment advisor, which primarily receives its compensation directly from its Clients. Investment Advisor Representatives of MOA Advisory, in their separate capacities, may receive commissions for implementation as detailed in Item 10 above. MOA Advisory may refer Clients to various third-parties to provide certain financial services necessary to meet the goals of its Clients. Likewise, MOA Advisory may receive referrals of new Clients from a third-party.

Participation in Institutional Advisor Platform

MOA Advisory has established an institutional relationship with Interactive Brokers ("IBKR") to assist the Advisor in managing Client account[s]. Access to the [Custodian] Institutional platform is provided at no charge to the Advisor. The Advisor receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets at TDA. The software and related systems support may benefit the Advisor, but not its Clients directly. In fulfilling its duties to its Clients, the Advisor

endeavors always to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a custodian creates a potential conflict of interest since these benefits may influence the Advisor's recommendation of this custodian over one that does not furnish similar software, systems support, or services. Additionally, the Advisor may receive the following benefits from TDA: receipt of duplicate Client confirmations and bundled duplicate statements; access to a trading desk that exclusively services its institutional participants; access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to Client accounts; and access to an electronic communication network for Client order entry and account information.

B. Client Referrals from Solicitors

MOA Advisory does not pay solicitors for Client referrals.

Item 15 - Custody

MOA Advisory does not accept or maintain custody of any Client accounts. All Clients must place their assets with a qualified custodian. Clients are required to select their own custodian to retain their funds and securities and direct MOA Advisory to utilize that custodian for the Client's security transactions. For more information about custodians and brokerage practices, see Item 12 - Brokerage Practices.

Item 16 - Investment Discretion

MOA Advisory generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by MOA Advisory. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an Investment Advisory Agreement containing all applicable limitations to such authority. All discretionary trades made by MOA Advisory will be in accordance with each Client's investment objectives and goals.

Item 17 - Voting Client Securities

MOA Advisory does not accept proxy-voting responsibility for any Client.

Item 18 - Financial Information

Neither MOA Advisory, nor its management has any adverse financial situations that would reasonably impair the ability of MOA Advisory to meet all obligations to its Clients. Neither MOA Advisory, nor any of its advisory persons, has been subject to a bankruptcy. MOA Advisory is not required to deliver a balance sheet along with this Disclosure Brochure, as the Advisor does not collect advance fees for services to be performed six months or more in advance.

Item 19 - Requirements for State Registered Advisors

A. Educational Background and Business Experience of the Principal Officer

The Managing Owner of MOA Advisory is Michael Akinosho. Mr. Akinosho also serves as the firm's Chief Compliance Officer. Information regarding the formal education, background and disclosures of the firm's principal officer is included in Item 2 of each officer's Part 2B below.

B. Other Business Activities of Principal Officer

Advisory persons of MOA Advisory have additional business activities that are detailed in Item 10 - Other Financial Activities and Affiliations and in each advisory persons' Form ADV 2B – Brochure Supplement (attached herein).

C. Performance Fee Calculations

MOA Advisory does not charge performance-based fees for its investment advisory services. The fees charged by MOA Advisory are as described in Item 5 – Fees and Compensation above and are not based upon the capital appreciation of the funds or securities held by any Client.

D. Disciplinary Information

There are no disciplinary events to disclose regarding MOA Advisory any of its advisory persons. Neither MOA Advisory nor its advisory persons has ever been involved in any regulatory, or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against MOA.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. *As previously noted, there are no disciplinary events to disclose regarding MOA Advisory or its advisory persons.*

E. Material Relationships with Issuers of Securities

Neither MOA Advisory nor its advisory persons has any relationships or arrangements with issuers of securities.



MOA ADVISORY & FINANCIAL SERVICES CO.

Form ADV Part 2B – Individual Disclosure Brochure

for

Michael Akinosho

**Effective: October 19, 2020,
Revised: June 09, 2023, Revised: July 17, 2023**

This Brochure Supplement provides information about the background and qualifications of Michael Akinosho (CRD No. 7286515) in addition to the information contained in the MOA Advisory & Financial Services Co (“MOA Advisory” or the “Advisor”) Disclosure Brochure. If you have not received a copy of this Brochure Supplement or if you have any questions about the contents of this Brochure Supplement or MOA Advisory’s Disclosure Brochure, please contact us at (224) 255-7846 or by email at michaelakinosho@moaadvisory.com.

Additional information about Michael Akinosho is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Michael Akinosho is the Managing Owner of MOA Advisory & Financial Services Co. Mr. Akinosho, born in 1974, is dedicated to serving the Clients of MOA Advisory & Financial Services Co. Mr. Akinosho earned a Master's Degree in Accounting from The University of Illinois at Chicago in 2001, and a Bachelor's Degree in Accounting from The University of Illinois at Chicago in 2000. Mr. Akinosho is an Enroll Agent (EA), licensed by the IRS and permitted to represent US Taxpayers before the IRS and US Tax Courts. Verify Mr. Akinosho's EA credential on the IRS's Directory of Federal Tax Return Preparers with Credentials at irs.treasury.gov/rpo/rpo.jsf. Additional information regarding Mr. Akinosho's employment history is included below.

Employment History:

MOA Advisory & Financial Services Co, Managing Owner & Tax Consultant	01/2018 to Present
Engooden Health Inc, Software Engineer – Data Scientist	04/2022 to 02/2023
American Medical Association, Senior Financial Analyst	08/2015 to 03/2022
Global View Capital Management, Investment Advisor	09/2020 to 10/2020
Ernst & Young, Manager – Advisory Services	06/2010 to 12/2014
University of Illinois at Chicago, Adjunct Lecturer	09/2016 to 05/2019
British Petroleum, Senior Performance Analyst	01/2005 to 06/2010

Item 3 – Disciplinary Information

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. However, we do encourage you to independently view the background of Mr. Akinosho on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov. Select Investment Adviser Search from the left navigation menu. Then select the option for Investment Adviser Representative and enter **7286515** in the field labeled "Individual CRD Number".

Item 4 – Other Business Activities

Accounting & Finance Practice, Tax Practice and Technology Practice within MOA Advisory

Michael Akinosho is the sole owner of MOA Advisory. Mr. Akinosho provides tax return preparation, tax issues consulting, tax planning, business accounting & finance services, software development and data science services. Clients who receive other services from MOA Advisory's may OR may not be clients of Investment Advising, and Financial Planning services and vice versa.

Broker-Dealer Affiliation

No Broker-Dealer Affiliations. MOA Advisory does custody client assets with Interactive Brokers LLC.

Item 5 – Additional Compensation

Michael Akinosho does not earn any additional compensation from other sources.

Item 6 – Supervision

Michael Akinosho serves as the Managing Owner and Chief Compliance Officer of MOA Advisory. Mr. Akinosho can be reached at (224) 255-7846. MOA Advisory has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to Clients of MOA Advisory. Further, MOA Advisory is subject to regulatory oversight by various agencies. These agencies require registration by MOA Advisory and its employees. As a registered entity, MOA Advisory is subject to examinations by regulators, which may be announced or unannounced. MOA Advisory is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Item 7 – Disclosures

Mr. Akinosho has two disclosures, both related to compromises with creditors:

Mr. Akinosho had to relocate for his work and tried to sell his residence in 2012. Wells Fargo was the 1st lien holder on the residential property and foreclosed when the loan amount on the property was higher than the market value of the property with a judicial sale of the property.

Mr. Akinosho had to relocate for work and tried to sell his residence in 2012. BMO Harris Bank the 2nd lien holder on the property, because the primary home loan amount was higher than the market value of the property. Mr. Akinosho paid the agreed amount to BMO Harris Bank N.A. as requested. Wells Fargo Bank was the 1st lien holder on the residential property and foreclosed.

Item 8 – Requirements for State Registered Advisors

Mr. Akinosho does not have any additional information to disclose.

Privacy Policy

Effective: January 02, 2018, Revised: June 06, 2023, Revised: July 17, 2023

Our Commitment to You

MOA Advisory & Financial Services Co ("MOA Advisory") is committed to safeguarding the use of your personal information that we have as your Investment Advisor. MOA Advisory (also referred to as "we", "our" and "us" throughout this notice) protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you. Our relationship with you is our most important asset.

We understand that you have entrusted us with your private information, and we do everything we can to maintain that trust.

MOA Advisory does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and proper business purposes in connection with the servicing and management of our relationship with you as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Privacy Policy.

Why you need to know?

Registered Investment Advisors ("RIAs") share some of your personal information. Federal and State laws give you the right to limit some of this sharing. Federal and State laws require RIAs to disclose how we collect, share, and protect your personal information.

What information do we collect from you?

Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number(s)	Income and expenses
E-mail address(es)	Investment activity
Account information (including other institutions)	Investment experience and goals

What sources do we collect information from in addition to you?

Custody, brokerage, and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

How we share your information?

RIAs do need to share personal information regarding its clients to effectively implement the RIA's services. In the section below, we list some reasons we may share your personal information.

Basis for sharing	Sharing	Limitations
Servicing our Clients We may share non-public personal information with non-affiliated third parties (such as brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed services to you consistent with applicable law, including but not limited to: • Processing transactions, • General account maintenance, • Responding to regulators or legal investigations; and • Credit reporting, etc.	MOA Advisory may share this information.	Clients cannot limit the Advisors ability to share.
Administrators We may disclose your non-public personal information to companies we hire to help administrate our business. Companies we hire to provide services of this kind are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. We limit their use of your personal information to the performance of the specific service we have requested.	MOA Advisory may share this information.	Clients cannot limit the Advisors ability to share.
Marketing Purposes MOA Advisory does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where MOA Advisory or the client has a formal agreement with the financial institution. We will only share information for purposes of servicing your accounts, not for marketing purposes.	MOA Advisory does not share personal information.	Clients cannot limit the Advisors ability to share.
Authorized Users In addition, your non-public personal information may also be disclosed to you and persons we believe to be your authorized agent or representative.	MOA Advisory does share personal information.	Clients can limit the Advisors ability to share.
Information About Former Clients MOA Advisory does not disclose, and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our clients.	MOA Advisory does not share personal information regarding former clients.	Clients can limit the Advisors ability to share.

How do we protect your information?

To safeguard your personal information from unauthorized access and use, we maintain physical, procedural, and electronic safeguards. These include computer safeguards such as passwords, two-factor authentication, secured files and buildings.

Our employees are advised about MOA Advisory's need to respect the confidentiality of each client's non-public personal information. We train our employees on their responsibilities.

We require third parties that assist in providing our services to you to protect the personal information they receive. This includes contractual language in our third-party agreements.

Changes to our Privacy Policy.

We will send you notice of our Privacy Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise our Privacy Policy and will provide you with a revised policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

State specific regulations

Illinois, Florida, California, and Texas

In response to an Illinois law, clients must "opt-in" to share non-public personal information with non-affiliated third parties before any personal information is disclosed. We may disclose non-public personal information to other financial institutions with whom we have joint business arrangements for proper business purposes in connection with the management or servicing of your account.

Questions: You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (224) 255-7846 or via email at michaelakinosho@moaadvisory.com.