






Equity Logic, LLC

Firm Brochure (Form ADV Part II)

Thomas H. Kee Jr., President

 415.999.9033 |  tomkee@equitylogic.net

 www.equitylogic.net

 PO Box 922, La Jolla, CA 92038

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Material Changes

- Addition of John Henry Alduenda as a contract Investment Advisor Representative (CRD#: 2469023) to Equity Logic's ADV Part II disclosure.
 - Introduction of new strategy: **ULTRA Evitar Corte**, which carries a 1% AUM fee and a 20% performance fee on profits exceeding the return of the S&P 500.
 - Introduction of new strategy: **LETS**, which carries a 2% management fee and a 20% participation fee.
 - Addition of new breakpoint: **≥ \$50M**, which qualifies for a 30% management fee discount.
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1. Advisory Business

Equity Logic, LLC is a Delaware-registered Investment Advisory Firm established in October 2010, operating virtually with secure cloud-based client documentation and communications.

- **Founder & Managing Director:** Thomas H. Kee Jr.
 - **Assets Under Management (as of 12/31/2024):** \$12 million (discretionary)
 - **Investment Focus:** US-listed equities, ETFs (including leveraged/short/long bias instruments)
 - **Client Customization:** Strategies are not customized per client, except by mutual consent in special situations
 - **Account Restrictions:** Only within agreed parameters; restrictive clients may require a tailored solution
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2. Fees & Compensation

Fee Structure: Transparent, strategy-specific, and clearly disclosed.

Strategy	Management Fee	Performance Fee
Evitar Corte	0.5% AUM	None
ULTRA Evitar Corte	1% AUM	20% above S&P 500 return
CORE Portfolio	1% AUM	20% Participation
ULTRA CORE	2% AUM	20% Participation
LETS	2% AUM	20% Participation
Bond Accounts	Negotiable	Varies by Return
Personalized Accounts	Case-by-case	Client-Driven

Breakpoints:

- ≥ \$5M: 10% management fee discount
- ≥ \$10M: 20% management fee discount
- ≥ \$50M: 30% management fee discount

Fee Timing: - Management Fees accrue daily. - Participation Fees accrue quarterly.

- ‘Held away’ assets: Paid monthly in arrears or quarterly in advance
 - No pre-paid management fees; no “wrap fee” programs
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3. Performance-Based Fees & Qualified Clients

Performance fees apply only to **Qualified Clients** under CCR Section 260.234, defined as follows:

1. **Assets Under Management**

A natural person or a company that has at least **\$1.1 million** under management with the investment adviser immediately after entering into the advisory contract.

2. **Net Worth**

A natural person or a company that the adviser reasonably believes has a **net worth exceeding \$2.2 million**, excluding the primary residence.

- Joint assets with a spouse may be included.
- Debts secured by the primary residence are excluded unless they exceed the home's fair market value.

3. **Knowledgeable Personnel**

An **executive officer**, director, trustee, general partner, or employee of the adviser who participates in investment activities and has done so for at least **12 months**.

4. **Qualified Purchaser Status**

The client qualifies as a **“qualified purchaser”** under Section 2(a)(51)(A) of the Investment Company Act of 1940.

Equity Logic mitigates conflict risks through rule-based strategies and full transparency.

4. Types of Clients

Services available to individuals, institutions, and third-party clients meeting the following thresholds:

- **Direct Clients:** \$500,000 minimum investment
 - **Via Advisors:** \$100,000 minimum
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5. Investment Methods & Risk Disclosure

Market Analysis Approach: Multi-horizon (near-, mid-, long-term) perspectives guide ETF-based strategies.

Core Strategies:

- **Evitar Corte:** S&P 500 participation with downside protection
 - **ULTRA Evitar Corte:** 2x Exposure to Evitar Corte Returns
 - **CORE Portfolio Strategy:** SPY–Cash rotation, tax-efficient, low volatility
 - **ULTRA Core:** 2x exposure to CORE Strategy returns
 - **LETS:** Aggressive Long/Short using Leveraged Index ETFs
 - **Custom Solutions:** Available for select clients
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6. Disciplinary Information

No client-related disciplinary actions.

Note: Thomas Kee voluntarily resigned from Morgan Stanley in 1999 due to disagreement over short-selling internet stocks.

7. Other Industry Affiliations

- No affiliations causing conflicts of interest.
 - No relationships with issuers of securities.
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8. Code of Ethics & Personal Trading

Equity Logic, its principals, and employees may participate in strategies post-client allocation using the same trade grouping methodology, ensuring fairness and transparency.

9. Brokerage Practices

- No directed brokerage or compensation arrangements
- Trades placed through exchanges with best-available liquidity
- Aggregated trades only for accounts with matching custodians

10. Account Reviews

- **Active Monitoring:** Positions in all strategies are continuously reviewed
 - **Client Reports:** Provided directly by custodians; clients retain full access to real-time statements
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11. Referrals & Compensation

- No referral payments to unregistered entities
 - Registered RIAs/Wholesalers may receive negotiated sub-account fees
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12. Custody

- Equity Logic does **not** maintain custody
 - Fees are collected directly by authorized custodians
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13. Discretionary Authority

- Full discretionary authority within strategy boundaries
 - No authority over deposits/withdrawals
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14. Proxy Voting

- Equity Logic does not vote proxies
 - Responsibility lies with the account's custodian or broker
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15. Financial Condition


- No bankruptcy history
- No prepaid fees or liabilities that may impair services
- Emergency protocols acknowledge risk in systemic events

16. Additional Disclosures for State-Registered Advisors

Principal:

Thomas H. Kee Jr.

 PO Box 922, La Jolla, CA 92038

 866.213.2067

Education:

- B.A. in Business and Economics – St. Mary’s College of California (1992)

Experience:

- 30+ years in finance
- Founder, strategist, and compliance lead for Equity Logic

Business Affiliations:

- Owner of *Stock Traders Daily*, a subscription-based financial publication

Compensation & Supervision:

- No third-party incentives
 - Mr. Kee is the supervisory authority within Equity Logic
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Investment Advisor Representative (Contract):

John Henry Alduenda

 PO Box 922, La Jolla, CA 92038

Education:

- MBA in Entrepreneurship
- Certified Financial Planner™ (CFP®)

Licenses: - FINRA Series 4, 7, 9, 10, 63, 66 - CRD#: 2469023

- California Insurance License #0F8889

Experience:

- Director of Customer Experience, Stock Traders Daily
- Vice President, Fidelity Investments (2007–2024)
- Branch Leader, TD Ameritrade (1993–2007)
- Adjunct Professor, UC Berkeley Extension

Business Affiliations:

- Contract IAR for Equity Logic, LLC
- Instructor and Consultant in Financial Services Education



Compensation & Supervision:

- Contract employee compensated for advisory duties through Equity Logic
- Supervised by Thomas H. Kee Jr. for all activities under the advisory umbrella**
- No third-party incentives
- Mr. Kee is the supervisory authority within Equity Logic