



November 6, 2018

Contact Person, *Treasurer*
Plan Name & Address

RE: **Plan Name**
Department of Labor Regulation 29 C.F.R 2550.408b-2

Pursuant to ERISA regulation 408(b)(2), all covered service providers to ERISA qualified plans are required to disclose to the Plan Sponsor the services offered/provided and compensation received. In accordance with this regulation, the following pages provide important information in connection with the services provided by Traynor Capital to the Plan. This disclosure is being provided to the “responsible plan fiduciary” for the Plan in compliance with Department of Labor Regulation 29 C.F.R 2550.408b-2.

This Fee Disclosure Document provides: 1) a description of the services offered by Traynor Capital to your Employee Retirement Income Security Act of 1974, as amended, (“ERISA”) governed employee benefit plan or account (the “Plan”); and 2) the fees and other compensation charged for, or otherwise related to, such services, attributable to your Plan’s management. It is designed to cover the information required by the Department of Labor’s final regulation under Section 408(b)(2) of ERISA.

This Disclosure Document is intended to be read in conjunction with the Program’s Form ADV, Part 2A-Appendix 1 Disclosure Brochure, as may be amended or supplemented from time to time (the “Brochure”), your Program Letter Agreement, Investment Management Agreement and Investment Advisory Agreement (the “Client Agreement”) and other documents referenced in this Disclosure.

Your Plan may receive services from other service providers, such as a third party administrator, which are outside the scope of this document. For information on those services and related fees and expenses, please refer to those service providers’ separate 408(b)(2) disclosure documents or contact those service providers. Moreover, to the extent that you receive services from Traynor Capital that are outside the scope of the services covered by this Fee Disclosure Document, please reference the disclosure documents specifically relating to those services.

If you have any questions concerning this 408(b)(2) Disclosure Document or the information provided to you concerning our services and compensation, please contact Keith Traynor, *Chief Compliance Officer*, Phone: 610 993 9050 or send an e-mail to keith@traynorcapital.com.

If you are not the “responsible plan fiduciary” authorized to engage the service providers, including Traynor Capital for your Plan, please forward this 408(b)(2) Disclosure Document to the appropriate responsible Plan fiduciary.

Traynor Capital
19 E King St. Bldg 2
Malvern, PA 19355

www.traynorcapital.com

**Traynor Capital
408(b)(2) Fee Disclosure Document**

Name of Plan

Guide to Information Required by Section 408(b)(2) Regulation	
Required Information	Page in This Document
Description of the services that Traynor Capital will provide to your Plan	3
A statement concerning the services that Traynor Capital will provide as a registered investment adviser or as an ERISA fiduciary	3 (under “Explanation of Status/Capacity”)
Compensation Traynor Capital will receive from your Plan (“direct” compensation)	3
Compensation Traynor Capital will receive from other parties that are not related to your Plan (“indirect” compensation)	Not applicable
Compensation that will be paid among Traynor Capital and related parties	Not applicable
Compensation that Traynor Capital will receive if you terminate your Plan’s service agreement	4
The cost to your Plan of recordkeeping services	Not applicable
Fees and expenses relating to your Plan’s investment options	5 (Investment Appendix)

Traynor Capital
408(b)(2) Fee Disclosure Document

Name of Plan

Traynor Capital
Investment Advisory Services and Direct Compensation

Description of Services

Traynor Capital is a Registered Investment Adviser with the SEC. For a description of the services provided, please refer to the sections entitled “Services, Fees and Compensation,” and “Additional Information” in the Form ADV, Part 2A-Appendix 1 Disclosure Brochure, and the Sections 1-6, 7-8 and 11 in the Plan’s Letter Agreement..

For a description of the services provided by the Investment Manager(s), please see their Form ADV, Part 2A and Section 1 of the Investment Management Agreement entered into with the Investment Manager(s).

Explanation of Status/Capacity

In providing investment advisory services, Traynor Capital will act as a fiduciary under ERISA, and as an investment adviser under the federal Investment Advisers Act of 1940 and applicable state law, as contemplated pursuant to the terms and conditions of your Plan’s applicable investment advisory agreement.

Direct Compensation

The fees that Traynor Capital charges for its investment advisory, consulting and investment management services are specified in the Investment Advisory Agreement between Traynor Capital and its client. The fee schedule(s) applicable to your particular arrangement(s) can be found in your Investment Advisory Agreement, Exhibit/Schedule A (Fee Schedule).

If you need a copy of your Client Agreements or the other referenced documents, please contact Keith Traynor ,CEO/ CCO of Traynor Capital at 610-993-9050 / keith@traynorcapital.com

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Name of Plan

Solicitation Arrangements

Traynor Capital may enter into arrangements with affiliated parties and third parties who refer potential clients for its investment advisory services, in return for solicitation fees. If the Plan was referred to the Program, the structure of a solicitation arrangement, including the compensation payable to the solicitor, will be disclosed fully as required by applicable law. Please consult these separate disclosures (which may be found in the Solicitor's Disclosure Statement included with your Client Agreement as Schedule A for information on any solicitation arrangements relevant to your Plan). Additionally, please refer to the "Client Referrals And Other Compensation" section in the Traynor Capital Form ADV, Part 2A,-Appendix 1 Disclosure Brochure. Clients do not pay higher investment management fees as a result of such a referral arrangement.

Termination Fee

There is no additional fee charged upon termination of Traynor Capital of investment advisory account or the related agreements.

Traynor Capital
408(b)(2) Fee Disclosure Document

Name of Plan

Investment Appendix

Required Information	Investment Manager(s), Strategy(ies) and Fee(s)	Information Location
Fees and expenses relating to your Plan's investment options	Investment Strategy Name (1) Transactions Fees (2) Wrap fee (3) Plan has entered into a dual contract, please also consult with the Investment Manager for their disclosures	(1) MAP Form ADV, Part 2A-Appendix 1 Disclosure Brochure, Pages 11-16 and 37-38 (2) Letter Agreement, Section 9; Exhibit A; and Section 5 of the Investment Management Agreement (3) Investment Manager is providing their 408(b)(2) Fee Disclosure
Fees and expenses relating to your Plan's investment options	Investment Strategy Name (1) Transactions Fees (2) Wrap fee (3) Investment Strategy Fee, if applicable (4) Sub-Adviser(s) fees	(1) MAP Form ADV, Part 2A-Appendix 1 Disclosure Brochure, Pages (2) & (3) Investment Advisory Agreement Multiple Strategy Account(s) and Schedule A of the Solicitors Disclosure Statement.