

The Operating Prospectus (The Rules)

The Momentum Phinance Phund: Operating Prospectus

1. Capital Allocation Structure

This publication operates on a "Skin in the Game" model. Revenue derived from subscriptions is allocated as follows:

- **Gross Revenue:** \$13.00/month per subscriber.
- **Net Income:** Gross Revenue minus Platform Fees (Substack) and Processing Fees (Stripe).
- **The "Take Home" (50% of Net):** Withdrawn for the publisher's personal use (Taxes, Bills, Life) and business operations.
- **The "Phund" (50% of Net):** Deposited into the tracked brokerage account.

The Phund Allocation:

The capital deposited into the brokerage is split evenly into two distinct strategies:

- **Bucket A (25% of Net Income): The Core Portfolio.**
 - *Strategy:* Buy & Hold / Value Averaging.
 - *Holdings:* 15 Stocks (5 Kings @ 10% weight, 10 Knights @ 5% weight, e.g.).
- **Bucket B (25% of Net Income): The Income Lab.**
 - *Strategy:* The Wheel (Selling Cash Secured Puts & Covered Calls).
 - *Goal:* Generate premium income to demonstrate cash flow mechanics.

2. Selection & Governance

- **No Individual Advice:** This publication provides general financial information and is not tailored to the specific circumstances of any individual subscriber.
- **The "Discussion" Model:**
 - The Publisher runs proprietary screeners (Momentum/Value/Volatility).
 - The Publisher presents candidates to the Paid Subscriber chat for debate and analysis.
 - **Final Discretion:** The Publisher retains 100% discretion over all buy/sell decisions. Subscribers do not vote on assets; they participate in the research process.

3. Regulatory Disclosure (The Publisher's Exception)

Momentum Phinance LLC is a publisher of financial news and opinion. We rely on the "Publisher's Exclusion" from the definition of an Investment Adviser under the Investment Advisers Act of 1940.

1. **Bona Fide Publication:** We publish genuine analysis, not paid promotional material for third parties.
2. **General & Impersonal:** Our content is the same for every subscriber. We do not look at your portfolio or give you specific instructions.
3. **Regular Circulation:** We publish on a consistent schedule, regardless of market conditions.