

IQTick Advisors

Form ADV Part 2A – Disclosure Brochure

Effective: January 4, 2013

This Disclosure Brochure provides information about the qualifications and business practices of PredictWallStreet, Inc. d/b/a IQTick Advisors (“IQTick”). If you have any questions about the contents of this Disclosure Brochure, please contact us at (831) 278-1565.

IQTick is a Registered Investment Advisor with the State of California. The information in this Disclosure Brochure has not been approved or verified by the U.S. Securities and Exchange Commission (“SEC”) 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 IQTick to assist you in determining whether to retain the Advisor.

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

**IQTick Advisors
CRD No: 151543
1840 41st Ave., Ste 102-171
Capitola, CA 95010
Phone: (831) 278-1565 * Fax: (831) 401-2391**

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 IQTick.

IQTick believes that communication and transparency are the foundation of our relationship and continually strive to provide our Clients with the complete and accurate information at all times. We encourage all current and prospective Clients 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 of this Disclosure Brochure.

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 IQTick.

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 IQTick:

- Click **Investment Advisor Search** in the left navigation menu.
- Select the option for **Investment Advisor Firm** and enter **151543** (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 (831) 278-1565.

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Item 4 – Advisory Services

A. Firm Information

PredictWallStreet, Inc. d/b/a IQTick Advisors (“IQTick” or the “Advisor”) is a Registered Investment Advisor with the State of California, which is organized as a corporation under the laws of the State of Delaware. IQTick was founded in 2009 and is owned and operated by CEO, Craig Kaplan, Phd. This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by IQTick.

B. Advisory Services Offered

IQTick offers investment advisory services to individuals, high net worth individuals, businesses in California and other states (each referred to as a “Client”).

Account Portfolio Management

IQTick practices custom management of portfolios, on a discretionary basis, according to the Client's objectives. The Advisor's primary approach is to use a proprietary investment strategy aimed at maximizing performance and managing portfolio risk. The Advisor uses exchange-listed securities, over-the-counter securities, foreign securities, warrants, corporate debt securities, municipal securities, mutual funds, United States government securities, foreign currencies and commodities and options in securities and commodities to accomplish this objective.

The Advisor will actively manage Client portfolios and may buy and sell security positions intraday. It will be common for all or a portion of a Client's portfolio to be invested in securities during the trading day and sold prior to the close, as appropriate, resulting in an invested cash balance at the end of the trading day. The Advisor may also recommend, on occasion, redistributing investment allocations to diversify the portfolio in an effort to reduce risk and increase performance. The Advisor may also recommend specific stocks to increase sector weighting and/or dividend potential. The Advisor may recommend employing cash positions as a possible hedge against market movement, which may adversely affect the portfolio. The Advisor 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, or any risk deemed unacceptable for the client's risk tolerance.

IQTick will provide investment advisory services and portfolio management services and will not provide securities custodial or other administrative services. At no time will IQTick 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.

C. Client Account Management

Prior to engaging IQTick 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:

D. Wrap Fee Programs

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

E. Assets Under Management

As of December 31, 2012, IQTick manages the following assets:

Assets Under Management	Assets
Discretionary Assets	\$565,000
Non-Discretionary Assets	--
Total	\$565,000

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 IQTick and the Client.

A. Fees for Advisory Services

Account Portfolio Management

Qualified Clients

The Management Fee for the investment strategies for “Qualified Clients” is at an annual rate of 2.00% of assets managed by the Advisor. In addition to the Management Fee, the Advisor may receive an Incentive Fee based upon any gains obtained in the Client’s account for the month. Incentive Fees are paid monthly in arrears and will be equal to 25% of any gains in the Client account during the month, subject to a “high water mark” to ensure the Advisor will not receive the Incentive Fee unless, and only to the extent that there are cumulative gains in the Client’s account. The Advisor may offer certain Clients the option of choosing an Incentive Fee of 25% with no monthly Management Fee instead of the payment option above. This is offered only to Clients that will employ leverage on their Accounts. Incentive Fees for new accounts will be reviewed from the time of management to the end of the first month. Please refer to the response to Item 6 below for more information about the Incentive Fee charged to qualified investors.

Non-Qualified Clients

The management fees for the investment strategies for “Non-Qualified Clients” are at an annual rate of up to 2.50% per annum depending on the type and complexity of the investment management strategy employed as well as the size of the account or overall Client relationship. The average Management Fee approximates 2.25% per annum. Generally, larger accounts or accounts with less complexity will be offered a lower Management Fee. Certain accounts may be charged Management Fees greater than 2.25% per annum based on complex situations, including, but not limited to, accounts with multiple investment objectives, multiple underlying registrations, aggressive growth strategies and/or accounts which require active trading to achieve Client objectives. Non-Qualified Clients will not be charged an Incentive Fee.

B. Fee Billing

Account Portfolio Management

Investment Management 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 month end date. The amount due is calculated by applying the monthly rate (annual rate divided by 12) to the total assets under management with IQTick at the end of each month. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the Investment Advisory Fee.

In addition, the Advisor will provide the Client a report itemizing the fee, including the calculation period covered by the fee, the account value and the methodology used to calculate the fee. It is the responsibility of the Client to verify the accuracy of these fees as listed on the custodian’s brokerage statement as the Custodian does not assume this responsibility. Clients provide written authorization permitting IQTick 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.

C. Other Fees and Expenses

Clients may incur certain fees or charges imposed by third parties, other than IQTick, 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 IQTick is separate and distinct from these custodian and execution fees.

D. Advance Payment of Fees and Termination

Account Portfolio Management

IQTick is compensated for its services at the end of the month in which investment advisory services are rendered. The initial term for services is typically six (6) month, as mutually agreed in Investment Advisory Agreement. Clients may request to terminate their Investment Advisory Agreement with IQTick, in whole or in part, by providing advance written notice of at least thirty (30) calendar days. Significant withdrawals may require the

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Advisor to terminate the Agreement. Clients will receive a prorated refund of any pre-paid Management Fees, based upon the number of days remaining in the month after the effective date of termination. Incentive Fees due will be calculated from the effective date of termination back to the start of the month, plus the prior month to determine fee calculations (See Item 6). The Client's Investment Advisory agreement with the Advisor is non-transferable without Client's written approval.

E. Compensation for Sales of Securities

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

Item 6 – Performance-Based Fees

In addition to the Management Fee, IQTick may receive an Incentive Fee based upon any gains obtained in the Client's account for the preceding month. This fee will be equal to 25% of any gains in the Client account at the end of the preceding month, subject to a "high water mark" to ensure the Advisor will not receive the Incentive Fee unless, and only to the extent that there are cumulative gains in the Client's account. Only "qualified clients" with either \$1.0 million under management or a net worth of \$2.0 million may be charged Incentive Fees. Incentive Fees will be calculated at the close of each calendar month and deducted from client accounts directly by the custodian. Incentive fees will only be charged in accordance to CCR 260.234.

A high-water mark (or "loss carryforward provision") is applied to the Incentive Fee calculation of each Qualified Client. This means that the Advisor only receives an Incentive Fee on increases in the account value of the Client's account in excess of the highest account value it has previously achieved. For example, if at the beginning of month 1, the account value was \$1,000,000, which then rose to \$1,100,000 at the end of the first month, an Incentive Fee would be payable on the \$100,000 in net return. If the next month, the account value drops below \$1,100,000, no Incentive Fee is charged. If in the third month, the account value rises above \$1,100,000, an Incentive Fee will be payable only on the return that exceeds \$1,100,000 (the high-water mark).

Item 7 – Types of Clients

IQTick provides investment advisory services to the following types of Clients:

- Individuals, Personal Trusts and Estates – private investors, investing their personal assets
- Corporations and Businesses – taxable business entities, investing cash reserves

The relative percentage each type of Client is available on IQTick's Form ADV Part 1. These percentages will change over time. IQTick generally does not impose a minimum account size for establishing a relationship.

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

A. Methods of Analysis

IQTick employs a proprietary research and trading methodology in constructing its portfolios and managing Client Accounts. This proprietary methodology utilizes sophisticated algorithms and data analysis from numerous sources to develop behavior patterns that are evaluated in the management of Client Accounts.

B. Risk of Loss

IQTick will actively manage portfolios and may buy and sell security positions intraday. It will be common for all or a portion of a portfolio to be invested in securities during the trading day and sold prior to the close, as appropriate, resulting in an invested cash balance at the end of the trading day. IQTick may also, on occasion, redistribute investment allocations to diversify a portfolio in an effort to reduce risk and increase performance.

IQTick may also buy or sell specific stocks to increase sector weighting and/or dividend potential. IQTick may employ cash positions as a possible hedge against market movement, which may adversely affect a portfolio. IQTick may sell positions for reasons that include, but are not limited to, harvesting capital gains or losses,

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business or sector risk exposure to a specific security or class of securities or overvaluation or overweighting of the position(s).

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 (831) 278-1565.

Item 9 – Disciplinary Information

There are no legal, regulatory or disciplinary events involving IQTick or any of its employees. IQTick 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 151543 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. You may also research the background of Craig Kaplan by selecting the Investment Adviser Representative and entering Dr. Kaplan’s Individual CRD# 5715174 in the field labeled “Individual CRD Number”.

Item 10 – Other Financial Activities and Affiliations

In addition to his role with the Advisor, Dr. Kaplan also serves as the CEO of PredictWallStreet, LLC a technology company that enables investors to make stock predictions. By aggregating the predictions and data of millions of online investors, it enables users of the technology to gain a better understanding of individual securities and the overall market. Dr. Kaplan spends approximately 25% of normal business and stock market hours on the business activities of PredictWallStreet, LLC. The Advisor generally does not recommend or sell the services provided by PredictWallStreet, LLC to its Clients. Customers of PredictWallStreet, LLC or Users of www.PredictWallStreet.com may choose to become Clients of the Advisor.

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

A. Code of Ethics

IQTick has implemented a Code of Ethics that defines our fiduciary commitment to each Client. This Code of Ethics applies to all persons associated with IQTick. The Code of Ethics was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. IQTick and its personnel owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of IQTick 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, 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. IQTick 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 (831) 278-1565 or via email at contact@iqtick.com.

B. Personal Trading and Conflicts of Interest

IQTick 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 IQTick or any associated person of IQTick, transact in any security to the detriment of any Client.**

Item 12 – Brokerage Practices

A. Recommendation of Custodian[s]

IQTick 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 IQTick to direct trades to this custodian as agreed in the Investment Advisory Agreement. Further, IQTick does not have the discretionary authority to negotiate commissions on behalf of our Clients on a trade-by-trade basis.

Where IQTick 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 IQTick. IQTick 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. IQTick 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.

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. **IQTick does not participate in soft dollar programs sponsored or offered by any broker-dealer.**
- 2. Brokerage Referrals** - IQTick 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 IQTick 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, IQTick 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. IQTick will execute its transactions through an unaffiliated broker-dealer selected by the Client. IQTick 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

Securities are evaluated at least daily and often intraday based on the Advisor's proprietary process. Accounts are monitored on a regular and continuous basis by Dr. Kaplan, CEO of IQTick. 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 as a result 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 IQTick if changes occur

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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 IQTick

IQTick is a fee-only advisory firm, who, in all circumstances, is compensated solely by the Client. IQTick does not receive commissions or other compensation from product sponsors, broker dealers or any un-related third party.

B. Client Referrals from Solicitors

IQTick may enter into referral agreements with third-party advisors under which IQTick pays a fee to a third-party for client referrals as permitted by Rule 206(4)-3 of the Investment Advisers Act of 1940, as amended. IQTick has agreed to pay the third parties a percentage of the revenue generated from the assets of Clients introduced to IQTick by the third-party. This fee percentage will be a fixed percentage of the total fees generated by the Client. Clients referred to IQTick will not be charged a higher management fee than other clients to cover the third-party's fee percentage.

Item 15 - Custody

IQTick 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 IQTick 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

IQTick 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 IQTick. 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 IQTick will be in accordance with each Client's investment objectives and goals.

Item 17 - Voting Client Securities

IQTick does not accept proxy-voting responsibility for any Client.

Item 18 - Financial Information

Neither IQTick, nor its management has any adverse financial situations that would reasonably impair the ability of IQTick to meet all obligations to its Clients. Neither IQTick, nor any of its advisory persons, has been subject to a bankruptcy or financial compromise. IQTick is not required to deliver a balance sheet along with this Brochure as the firm 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 Principal Officer

The CEO of IQTick is Craig Kaplan. Information regarding the formal education and background of Dr. Kaplan is included in Item 2 of Part 2B below.

B. Other Business Activities of Principal Officer

Dr. Kaplan has additional business activities that are detailed in Item 10 - Other Financial Activities and Affiliations.

C. Performance Fee Calculations

IQTick may receive a Performance Fee based upon any gains obtained in the accounts of Qualified Clients. Performance-based compensation may create an incentive for the Advisor to recommend an investment that may carry a higher degree of risk to the Client. Please see Item 6 – Performance Fees for additional information.

D. Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding IQTick or Dr. Kaplan. Neither IQTick nor Dr. Kaplan has ever been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against IQTick or Dr. Kaplan.

E. Material Relationships with Issuers of Securities

Neither IQTick nor Dr. Kaplan has any relationships or arrangements with issuers of securities.

Form ADV Part 2B – Brochure Supplement

for

**Dr. Craig Kaplan, PhD
CEO**

Effective: January 4, 2013

This Brochure Supplement provides information about the background and qualifications of Craig Kaplan. (CRD# 5715174) in addition to the information contained in the IQTick (“IQTick” or the “Advisor” - CRD #151543) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you any questions about the contents of the IQTick Disclosure Brochure or this Brochure Supplement, please contact us at (831) 278-1565.

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

Item 2 – Educational Background and Business Experience

The CEO of IQTick is Craig Kaplan. Dr. Kaplan, born in 1963, is a dedicated Portfolio Manager for Client accounts of IQTick. Dr. Kaplan earned a PhD in Cognitive Psychology from Carnegie Mellon University in 1989. Dr. Kaplan earned a B.A. in Computer Science and Psychology from University of California at Santa Cruz in 1985. Dr. Kaplan earned an MS in Cognitive Psychology from Carnegie Mellon University in 1986.

Additional information regarding Dr. Kaplan’s employment history is included below.

Employment History:

CEO, IQTick	09/2009 to Present
CEO, PredictWallStreet, LLC	2005 to Present
CEO, Predict Wall Street, Inc	2005 to Present
CEO, iQ Company	1993 to 2005

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Dr. Kaplan. Dr. Kaplan has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Dr. Kaplan.

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 legal, civil or disciplinary events to disclose regarding Dr. Kaplan.*

However, we do encourage you to independently view the background of Dr. Kaplan 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 5715174 in the field labeled “Individual CRD Number”.

Item 4 – Other Business Activities

Dr. Kaplan has additional business activities that are detailed in Item 10 - Other Financial Activities and Affiliations in Part 2A above.

Item 5 – Additional Compensation

Dr. Kaplan has additional business activities where compensation is received. These business activities are detailed in Item 10 - Other Financial Activities and Affiliations in Part 2A above.

Item 6 – Supervision

Dr. Kaplan serves as the CEO and Chief Compliance Officer of IQTick. Dr. Kaplan can be reached at (831) 278-1565. IQTick has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to Clients of IQTick. Further, IQTick is subject to regulatory oversight by various agencies. These agencies require registration by IQTick and its employees. As a registered entity, IQTick is subject to examinations by regulators, which may be announced or unannounced. IQTick 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.

Privacy Policy

Effective: January 4, 2013

Our Commitment to You

IQTick ("IQTick") is committed to safeguarding the use of your personal information that we have as your Investment Advisor. IQTick (referred to as "we", "our" and "us" throughout this notice) protects the security and confidentiality of the personal information we have and make efforts to ensure that such information is used for proper business purposes in connection with the management or servicing of your account. 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.

We do not sell your non-public personal information to anyone. Nor does IQTick provide such information to others except for discrete and proper business purposes in connection with the servicing and management of your account 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.

The Information We Collect About You

You typically provide personal information when you complete the paperwork required to become our Client. This information may include your:

• Name and address	• Assets
• E-mail address	• Income
• Phone number	• Account balance
• Social security or taxpayer identification number	• Investment activity
	• Accounts at other institutions

In addition, we may collect non-public information about you from the following sources:

- Information we receive on Brokerage Agreements, Managed Account Agreements and other Subscription and Account Opening Documents;
- Information we receive in the course of establishing a customer relationship including, but not limited to, applications, forms, and questionnaires;
- Information about your transactions with us or others

Information About You That IQTick Shares

IQTick works to provide products and services that benefit our customers. We may share non-public personal information with non-affiliated third parties (such as brokers and custodians) as necessary for us to provide agreed services and products to you consistent with applicable law. We may also 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. In addition, your non-public personal information may also be disclosed to you, persons we believe to be your authorized agent or representative, regulators in order to satisfy IQTick's regulatory obligations, and is otherwise required or permitted by law. Lastly, 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.

To repeat, we do not sell your non-public personal information to anyone.

Information About Former Clients

IQTick 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.

IQTick Advisors

1840 41st Ave., Ste 102-171 * Capitola, CA 95010

Phone: (831) 278-1565 * Fax: (831) 401-2391

www.IQTICK.com

Confidentiality and Security

Our employees are advised about the firm's need to respect the confidentiality of our customers' non-public personal information. Additionally, we maintain physical, procedural and electronic safeguards in an effort to protect the information from access by unauthorized parties.

We'll Keep You Informed

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. You may obtain a copy of our current privacy policy by contacting us at (831) 278-1565.

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