

MARKET PALACE

FORM ADV PART 2B

Luke Rhoads

411 Oak St Unit 91 Frederick, CO 80530

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This brochure provides information about the qualifications and business practices of Market Palace LLC. If you have any questions about the contents of this brochure, please contact us at 720 394- 6355 or Luke@marketpalacecapital.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional Information about Market Palace LLC also available on the SEC website at www.adviserinfo.sec.gov (IARD# 281641)

Registration as investment advisor does not imply a certain level of skill or training.

Educational Background and Business Experience

Luke Rhoads was born in 1985. He attended the New Mexico Institute of Mining and Technology where he received a Bachelor of Science Degree in Management. During his time at New Mexico Tech Luke Rhoads was one of the original members of the New Mexico Tech Student Investment Club, where he was treasurer, vice president, and ultimately president. After college Luke Rhoads started a small business where he grew sales and profitability. Luke Rhoads has over 16 years of trading experience in the financial markets.

Disciplinary Information

There are no legal or disciplinary events that are material to a clients or prospective clients evaluation of the supervised person. There have been no civil, criminal, administrative, or self-regulatory organization proceedings relating to Luke Rhoads.

Other Business Activities

Luke Rhoads is actively engaged as the managing director of the general partner which operates the pooled investment vehicle. Luke Rhoads does not receive any compensation based on the recommendation of any securities or investment products.

Additional Compensation

Luke Rhoads does not receive any additional economic benefit as an investment advisor representative to the pooled investment vehicle for any advisory services provided to those who are not clients.

Supervision

Luke Rhoads is the Managing Director of the investment advisor to the pooled investment vehicle. He is responsible for the implementation of all policies and procedures, code of ethics, allocation of opportunities and security relating to the pooled investment vehicle.

Requirements for State Registered Advisers

Luke Rhoads has not been awarded nor found liable in arbitration, self-regulatory organization, or administrative proceeding for any claim involving; investment related business activity, fraud, false statements, omissions, theft, embezzlement, bribery forgery, counterfeiting, extortion, dishonest, unfair or unethical business practices.