



# S I M P L I F I

## SimpliFi, LLC

An SEC Registered Investment Adviser  
[SEC File #801-63672]

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[www.gosimplifi.com](http://www.gosimplifi.com)  
[www.simplifi.net](http://www.simplifi.net)

Form ADV Part 2  
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This brochure provides information about the qualifications and business practices of SimpliFi, LLC. If you have any questions about the contents of this brochure, please contact Bryan Link, Chief Compliance Officer at (336) 422-6017.

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or by any state securities authority. Additional information about SimpliFi, LLC also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

While the firm and its associates may be registered with the SEC or notice-filed in other jurisdictions, that registration does not imply an endorsement by any regulatory authority, nor imply a certain level of skill or training on the part of the firm or its associated personnel.

Item 1 – Cover Page

## **Item 2 - Material Changes**

This brochure is an amended version of the firm's original filing of October 22, 2010 to further clarify its ownership structure (see Item 4) and to reformat the document to its current structure. No other material changes have been made. For future filings this section of the brochure may address only those material changes that have occurred since the firm's last annual update.

The firm may at any time update this document and either send a copy of its updated brochure or provide a summary of material changes to its brochure and an offer to send an electronic or hard copy form of the updated brochure. Clients are also able to download this brochure from the SEC's Website: [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) or may contact our firm at (336) 422-6017 to request a copy at any time.

As with all firm documents, clients and prospective clients are encouraged to review this brochure in its entirety and are encouraged to ask questions at any time prior to or throughout the engagement.

### **Item 3 - Table of Contents**

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#### **Item 4 - Advisory Business**

##### **Information about Simplifi and its Services**

Simplifi, LLC ("SimpliFi" or the "firm") is a North Carolina limited liability company formed in 2004. Mr. Bryan Link is the firm's chief executive officer and chief compliance officer. The firm's majority shareholders are InHalf, LLC (a North Carolina limited liability company) and Harborway Associates, LLC (a Delaware limited liability company). Our firm is not a subsidiary of, nor do we control, another securities industry entity.

In addition to our 2005 registration as an SEC investment adviser, our firm and its associates may notice-file, register or meet certain exemptions to registration in other jurisdictions in which we conduct investment advisory business.

SimpliFi, LLC provides advisory services solely via its Internet website or through an Internet link to its system through various websites, such as those operated by banks, credit unions and other financial services organizations that the firm has been engaged. The firm does not provide asset management services, wrap fee programs, or charge an asset-based fee. Due to the nature of the firm's advisory services, it does not maintain client assets directly under its management.

Depending on each client's unique circumstances or specific requests, financial planning recommendations may be general in nature or focused on particular areas of interest or need. When the firm is engaged to provide narrowly-defined financial planning, the client must understand that their overall financial situation or objectives may not be fully addressed due to limitations determined by the client.

SimpliFi provides advice in the form of a financial plan called a Report Card. Clients using the service will receive a written financial plan via the internet, providing the client with a detailed financial plan designed to achieve his or her stated financial goals and objectives. SimpliFi gathers required information for the financial plan from answers the client must provide on the website in an online "interview" with a Virtual Financial Adviser using data input forms. The client completes each required information page, and the pages are compiled using a software program that builds a complete financial background for that particular client. Information gathered includes a client's current financial status and future goals. Each page requires that all necessary fields be completed before being submitted, thereby preventing incomplete information about the client's current situation or future goals. Not every field in a form may be a required field, however, in performing its services the firm shall not be required to verify any information received from the client and is expressly authorized to rely thereon.

When the information has been collected, SimpliFi uses its proprietary computerized financial modeling program to analyze the information supplied by the client. The program will also allow the client to tailor their situation by adjusting the various inputs to the planning model. When the client is satisfied with the plan's likelihood of success measurement, the SimpliFi Personal Planning Service will provide the client with a report covering any or all of the following areas:

**GOALS:** Future financial goals include estate and charitable goals.

**CASH FLOW & BUDGETING:** An analysis of a client's assets, liabilities and net worth, income and spending analyses and planning for current and future years.

**DEBT MANAGEMENT:** An analysis of a client's short and long-term debt, and recommendations for paying off consumer debt using either an accelerated payment approach (referred to as a "debt snowball" method) or a loan consolidation approach to fund a lump-sum payoff of all debts.

**RETIREMENT:** Analysis of current situation and recommendations on immediate and future strategies and investment plans to help the client achieve his or her retirement goals.

**EDUCATION PLANNING:** Analysis of current situation and advice on future course of action and investment allocation.

**INVESTMENTS:** Recommended four class asset allocation based on current situation, goals, and required annual savings rates.

The plan will be delivered for viewing over the Internet. The client will be able to save multiple versions of their information and print a copy of each version using portable document format (.pdf). This will enable any client with a printer to print the plan. The client retains absolute discretion over all such implementation decisions and is free to accept or reject any recommendation from the firm.

Should a client choose to implement the asset-class recommendations or advice contained in the plan, SimpliFi may also provide that client with access to certain third-party providers via website link or contact information. In doing so, SimpliFi may receive compensation from these providers either through payment for lead generation or advertising, however, the client's use of these providers is entirely at their discretion. Financial advice is not limited to any specific product or service offered by a broker-dealer, mutual fund or insurance company, or other financial services organization.

SimpliFi may provide this service directly to customers and/or may enter into joint marketing relationships with other firms to offer the service to the customers of these other firms. SimpliFi may also provide this service in a private-label format (with appropriate customization) to financial services companies for distribution to groups of users that may or may not include the general public.

#### Firm Services

The firm will use its best judgment and good faith effort in rendering its services to its clients. SimpliFi cannot warrant or guarantee any particular level of account performance, or that account will be profitable over time. Past performance is not necessarily indicative of future results.

Except as may otherwise be provided by law, the firm will not be liable to the client, heirs, or assigns for any loss an account may suffer by reason of an investment decision made or other action taken or omitted in good faith by the firm with that degree of care, skill, prudence and diligence under the circumstances that a prudent person acting in a fiduciary capacity would use; any loss arising from the firm's adherence to the client or their legal agent's direction; or any act or failure to act by a service provider maintaining an account.

Notwithstanding the preceding, nothing within the client services agreement is intended to diminish in any way the firm's fiduciary obligation to act in the client's best interest or shall in any way limit or waive any client rights have under federal or state securities laws or the rules promulgated pursuant to those laws.

## **Item 5 - Fees and Compensation**

### **Financial Planning Fees**

SimpliFi may receive compensation for providing financial planning services to clients through licensing fees paid by a sponsor, lead generation, or advertising. Sponsors may include financial institutions, employers, or other entities clients maintain a relationship. Sponsors who contract to offer the SimpliFi service will pay SimpliFi a license fee. License fees paid to SimpliFi by the sponsor will be negotiated between SimpliFi and the sponsor, memorialized in a separate agreement, and may or may not be based on the number of clients who use the SimpliFi service. In certain situations, although the sponsor is paying SimpliFi a licensing fee to allow clients to utilize SimpliFi's service, clients will interact directly with SimpliFi through its online system.

Fees are not prepaid or deducted by SimpliFi through a client account. SimpliFi may reduce and/or waive part or all of these licensing fees at its discretion as a promotional offer to attract new clients.

Any transactional or custodial fees assessed by the selected custodian or clearing firm, and/or individual retirement account or qualified retirement plan account termination fees, are borne by the client and are as provided in the current, separate fee schedule of the selected service provider. SimpliFi does not receive any of these types of fees.

### **Termination of Services**

Under certain circumstances, licensing agreements between SimpliFi and sponsors may be cancelled by one or both parties. Upon cancellation of any licensing agreement, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable.

Regardless of such circumstances, clients can terminate their usage of the SimpliFi service at any time without recourse.

## **Item 6 - Performance-Based Fees and Side-By-Side Management**

The firm's investment management services fees will not be based upon a share of capital gains or capital appreciation of the funds or any portion of funds of an advisory contract, also known as performance-based fees.

## **Item 7 - Types of Clients**

As an Internet-only firm, SimpliFi may provide its services to a broad range of individuals; from early savers and investors to high net worth individuals interested in engaging the firm for its unique online services. The firm does not limit its services to clients based on levels of investable assets, experience, etc.; in fact the firm encourages those with limited assets or income to participate so that SimpliFi may assist them in preparing an appropriate plan for their future.

Should there be a licensing or referral arrangement in place, clients may be subject to the sponsor or service provider's account restrictions, which will be disclosed prior to the client's engagement with the entity.

## **Item 8 - Methods of Analysis, Investment Strategies and Risk of Loss**

### **Method of Analysis**

If SimpliFi's online solution is engaged to provide investment advice, the client's current financial situation, needs, goals, objectives and tolerance for risk are evaluated. Asset allocation and investment policy decisions are then calculated, in the firm's judgment, to assist the client in achieving their overall financial objectives while attempting to minimize exposure to risk. The SimpliFi planning model uses publicly available historical investment performance data for its asset classes.

Because the SimpliFi Personal Planning Service is comprehensive, it may include recommendations related to short-term as well as long-term goals, depending on the client's stated goals. However, the SimpliFi planning model's primary investment strategy is long-term in nature.

### **Investment Strategies**

SimpliFi's model portfolios are constructed based on the principles of the Modern Portfolio Theory and a mathematical technique commonly known as "mean variance optimization." The result of this process is a portfolio allocation that potentially produces the highest possible return for a given level of risk.

Although the firm develops an overall asset allocation model following client input, it does not create a customized portfolio or recommend specific investments for each client. There are four general asset class models SimpliFi will recommend based upon provided client data which include large cap, small cap, bonds or bond funds, and cash positions.

The client may choose from a broad range of investment vehicles offered through other service providers, which may include mutual funds, exchange-traded fund/notes, individual securities, derivatives, and non-correlating asset classes. Individual securities may include common or preferred stocks, bond debentures, U.S. Government issues, notes, commercial paper, etc. Derivatives typically refer to options, futures and swaps that may be used to hedge risk or to exchange a floating rate of return for fixed rate of return. Non-correlating assets would include commodities, managed futures funds, private equity and real estate that may be employed to enhance the diversity of a portfolio; typically acting as a counterbalance should investments within a portfolio of stocks and bonds fall in value. *SimpliFi does not make a specific recommendation as to what type of asset should be selected.*

### **Risk of Loss**

While SimpliFi believes its strategies and investment selection is designed to potentially produce the highest possible return for a given level of risk, it cannot warrant or guarantee that an investment objective or planning goal will be achieved. Some investment decisions may result in loss, which may include the original principal invested. The client must be able to bear the various risks involved in the investment of account assets, which may include market; currency, interest rate, liquidity, operational or political risk, among others.

When the firm's research and analyses is based upon commercially available software, rating services, general market and financial information, the firm is relying upon the accuracy and validity of the information or capabilities being provided by selected vendors, rating services, and market data information. The firm makes every effort to determine the accuracy of the information received but it

cannot foretell events or actions taken or not taken, or the validity of all information it has researched or provided which may or may not affect the advice to or investment results of a client account or financial plan.

A portfolio that employs a passive, efficient markets approach (representative of Modern Portfolio Theory) has the potential risk that at times the broader allocation may generate lower-than-expected returns than those from a specific, more narrowly focused asset, and that the return on each type of asset is a deviation from the average return for the asset class. We believe this variance from the “expected return” is generally low under normal market conditions when a portfolio is made up of diverse, low or non-correlated assets.

Although not a common practice or recommendation by the firm, an account employing shorter term or frequent trading strategies may result in additional transactional costs or create taxable events that will be borne by the client, and potentially reducing or negating any benefit derived by such investing.

#### **Item 9 - Disciplinary Information**

Neither the firm nor any member of its management has been involved in a material criminal or civil action in a domestic, foreign or military jurisdiction, an administrative enforcement action, or self-regulatory organization proceeding that would reflect poorly upon our firm’s advisory business or the integrity of our firm.

#### **Item 10 - Other Financial Industry Activities and Affiliations**

Neither SimpliFi nor its associated persons are affiliated with another securities industry entity. The firm is engaged with other industry entities through licensing or referral arrangements for its services as described in Item 14.

It is the firm’s policy to require personnel to conduct business activities in a manner that avoid actual or potential conflicts of interest between the firm, employees and clients, or that may otherwise be contrary to law. The firm will provide disclosure to its client, through this brochure and other readily identifiable media where necessary, prior to and throughout the term of an engagement of any conflicts of interest which will or may reasonably compromise its impartiality or independence.

#### **Item 11 - Code of Ethics, Participation or Interest in Client Transactions and Personal Trading**

##### **Code of Ethics**

The firm has adopted a Code of Ethics that sets forth the policies of ethical conduct for all personnel and accepts the obligation not only to comply with the mandates and requirements of all applicable laws and regulation but also to take responsibility to act in an ethical and professionally responsible manner in all professional services and activities. The firm’s policies include the prohibition against insider trading, circulation of rumors, and certain political contribution activities.

Not all organizational duties are segregated; the firm employs policies and procedures to ensure timely, accurate record keeping and supervision. Certain functions may be outsourced to assist in these efforts when/as necessary.



SimpliFi periodically reviews and amends its Code of Ethics to ensure that it remains current, and requires firm access persons to attest to their understanding of and adherence to the Code of Ethics at least annually. The firm will provide a copy of its Code of Ethics to any client or prospective client upon request.

#### Participation or Interest in Client Transactions

Neither the firm nor any related person are authorized to recommend to a client, or effect a transaction for a client, involving any security in which the firm or a related person has a material financial interest, such as in the capacity as an underwriter, adviser to the issuer, etc. Additionally, employees are prohibited from taking or providing a loan from a client unless it is an approved financial institution or a natural person that is an immediate family member.

#### Employee Personal Trading

The firm and its related persons do not make specific investment recommendations to clients, nor will SimpliFi and its employees have knowledge or record of a client's transaction that might create a perceived or actual conflict of interest between parties involving employee's personal trading accounts. The firm has established and enforces its personal trading policy, and maintains the required personal securities transaction records per regulation.

#### **Item 12 - Brokerage Practices**

SimpliFi, LLC is not affiliated with any bank, custodian, or broker-dealer firm. The firm does not accept non-cash compensation (termed "soft dollars" in certain jurisdictions), such as products or services from other service providers to support its operations.

Compensation may be paid to the firm when a client engages a recommended service provider. Further details are provided in Item 14.

Due to the scope and nature of the firm's services, it does not aggregate client orders or act in a principal or agency basis involving client transactions, nor does it engage in directed brokerage activities. In light of its delivery of incidental advice through its financial planning solution, the firm does not believe it is obligated to seek or review best execution under current industry guidelines.

#### **Item 13 - Review of Accounts**

##### Recommended Reviews

No regular or unscheduled reviews are performed by SimpliFi for clients of the SimpliFi Personal Planning Service, however, clients may create and receive an updated report at any time by logging in and access their plan information on the SimpliFi website ([www.gosimplifi.com](http://www.gosimplifi.com)) or the website provided through their financial institution or selected service provider. Further, the SimpliFi Continuous Contact System prompts clients by email on a quarterly or annual basis to review/update their plan.

##### Reports and Frequency

Clients who have opened and maintained an investment account on their own or with the assistance of their financial consultant will receive account statements sent directly from mutual fund companies,

transfer agents, custodians or brokerage companies where their investments are held. SimpliFi urges clients to carefully review these statements for accuracy and clarity.

Although SimpliFi may provide asset allocation reports based on the data entered by the client, the firm does not provide ongoing performance reporting under its service engagements. Clients are urged to carefully review and compare account statements that they have received directly from their own service provider with any report received from our firm.

#### **Item 14 - Client Referrals and Other Compensation**

For those firms who pay a licensing or referral fee for the SimpliFi Personal Planning Service for use with their customers, SimpliFi will, upon request, embed contact information and/or website links to associated operations of that service provider.

Although SimpliFi itself does not require its users as a condition of the User Agreement to patronize these other entities for their investment product or insurance needs, it does offer recommendation to that service provider. SimpliFi does conduct a review of these firms but does not warranty the licensing, credentials, or commission structure of recommended service providers' operation(s), as outlined in the SimpliFi Licensing Agreement.

SimpliFi may also, from time-to-time, receive compensation in the form of professional fees for consulting services provided to firms who license the SimpliFi planning service. These services may include customizing and implementing hardware/software to support the SimpliFi planning service; providing marketing support for the use of the SimpliFi planning service with the firm's customers; and training firm employees to support the use of the SimpliFi service by its customers.

#### **Item 15 - Custody**

Client funds and securities will be maintained by unaffiliated, qualified custodians; banks, broker-dealers, or open-end mutual fund company transfer agents and not with or by SimpliFi, LLC or any associated person of the firm. In keeping with the policy of not having custody of client funds or securities, SimpliFi:

- Restricts the firm and its associates from acting as trustee of a non-family member account or having full power of attorney over a client account.
- Is prohibited from having authority to withdraw securities or cash assets from a client account.
- Does not accept or forward client securities (i.e., stock certificates) erroneously delivered to the firm.
- Will not collect advance fees of \$1,200 or more for services that are to be performed six months or more into the future.
- Will not authorize any associate to have knowledge of a client's account information (i.e., online 401(k), brokerage or bank accounts), even for the convenience or accommodation of the client or their legal agent.

The firm does not provide client transaction confirmations or summary account statements, as these are sent directly from the client's selected service provider maintaining their account. Any reports the client may create from SimpliFi's online service, that include investment performance data they themselves had entered into the system, should be compared to those account statements received from their service provider.

#### **Item 16 - Investment Discretion**

The firm does not offer investment management or transactional services and, therefore, it does not engage in discretionary or non-discretionary investment activity. Clients are free to accept or reject the recommendations made by SimpliFi's online solution at their own discretion.

#### **Item 17 - Voting Client Securities**

##### **Proxy Voting**

The firm does not vote client proxies nor offers guidance on how to vote proxies. Clients maintain exclusive responsibility for directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted as well as making all other elections relative to mergers, acquisitions, tender offers or other events pertaining to the client's investment assets.

##### **Other Corporate Actions**

The firm will have no power, authority, responsibility, or obligation to take any action with regard to any claim or potential claim in any bankruptcy proceeding, class action securities litigation or other litigation or proceeding relating to securities held at any time in a client account, including, without limitation, to file proofs of claim or other documents related to such proceeding, or to investigate, initiate, supervise or monitor class action or other litigation involving client assets.

##### **Firm's Receipt of Materials**

The client may receive proxies or other similar solicitations sent directly to them from their selected custodian or transfer agent. SimpliFi will not accept nor forward correspondence relating to the voting of client securities, class action litigation, or other corporate actions. Clients should ensure their selected service provider forwards these materials to their or their legal agent's address of record.

#### **Item 18 - Financial Information**

Due to the nature of its services, an audited balance sheet is not required nor included in this disclosure. No further material financial information is provided.

The firm and its management do not have a financial condition likely to impair its ability to meet its commitment to clients.

The firm and its management have not been the subject of a bankruptcy petition at any time during the past 10 years.

#### **Item 19 – Requirements for State-Registered Advisers**

This section is reserved for state-registered investment advisers and is not applicable to our firm.

## Part 2B: Brochure Supplement (Advisory Personnel)

SimpliFi, LLC  
635 N. Trade Street  
Winston Salem, NC 27101  
(336) 422-6017  
www.gosimplifi.com

### **Chief Executive Officer/Chief Compliance Officer/Chief Product Officer**

Charles Bryan Link (Born 1971)

#### **Educational Background and Business Experience**

Education: MBA - Wake Forest University; Winston-Salem, NC  
BA - Austin Peay State University; Clarksville, TN

Experience: CEO/CCO - SimpliFi, LLC (2004-Present)  
Contract Manager - BrightLeaf Financial Network, LLC (2008-2010)  
Director of Development - Wake Forest University School of Law (1999-2004)

#### **Disciplinary Information**

Not Applicable

#### **Other Business Activities**

Not Applicable

#### **Additional Compensation**

Not Applicable

### **Financial Modeling Adviser**

Robert E. Lamy

#### **Educational Background and Business Experience**

Education: PhD - Louisiana State University; Baton Rouge, LA  
MBA - Southeastern Louisiana University; Hammond, LA  
BS - Southeastern Louisiana University; Hammond, LA

Experience: Financial Modeling Adviser - SimpliFi, LLC (2004-Present)  
Professor - Wake Forest University (1990-Present)

#### **Disciplinary Information**

Not Applicable

#### **Other Business Activities**

Dr. Lamy also serves as a professor at Wake Forest University's Babcock Graduate School of Management.

#### **Additional Compensation**

Salary - Wake Forest University

### **Supervision**

Mr. Link serves in a supervisory capacity with the firm as both its Chief Executive Officer and Chief Compliance Officer. Questions relative to the firm, its staff, or services provided may be made to the attention of Mr. Link at (336) 422-6017. Additional information about the firm and other advisory firms is made available on the Internet at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). A search of this site for firms or their associated personnel can be accomplished by name or a unique firm identifier, known as an IARD number. The IARD number for SimpliFi, LLC is 133372.