

# Form ADV Part 2A Firm Brochure

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This brochure provides information about the qualifications and business practices of Silicon Valley Retirement Services, LLC. If you have any questions about the contents of this brochure, please contact us at (408) 572-5572 or [info@svretirementservices.com](mailto:info@svretirementservices.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 Silicon Valley Retirement Services, LLC is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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## Advisory Business

Silicon Valley Retirement Services (SVRS) provides investment consulting services to plan sponsors of qualified retirement plans and non-qualified deferred compensation plans. These services include creation of an Investment Policy Statement (IPS), mutual fund selection and monitoring, development and maintenance of mutual fund model portfolios, and recommendations for investment menu changes when such changes are deemed advisable.

SVRS was established in May, 2010. Timothy Cole and Scott Keswick are principals and each own fifty percent of SVRS.

Below is the education and business background for each SVRS principal.

Timothy A. Cole, CFP, MBA

Education: San Jose State University - MBA

Menlo College - BS, Business Administration.

Business background: May 2010 - Present: Silicon Valley Retirement Services, LLC

2007 - May 2010: StanCorp Equities, Inc.

2000 - 2007: Invesmart Advisors, Inc.

1998 - 2000: PGR Advisors, Inc.

1995 - 1998: Nationwide Financial Services, Inc.

Scott A. Keswick, CPC, QPA

Education: UCLA - BS, Mathematics / Applied Science.

Business background: March 2010 - Present: Silicon Valley Retirement Services, LLC

2007 - 2009: Standard Retirement Services, Inc.

2000 - 2007: Invesmart, Inc.

SVRS provides advice as to the types of mutual funds or exchange traded funds that a Plan Sponsor may want to include in their qualified retirement plan. SVRS does not provide advice on investments aside from registered mutual funds and exchange traded funds.

SVRS manages each of their client plans according to an Investment Policy Statement (IPS). Clients may customize the IPS to meet their specific needs.

SVRS manages assets on a non-discretionary basis. As of December 31, 2012, the amount of assets managed by SVRS was approximately \$235,000,000.

## Fees and Compensation

Fees for our services are charged based on a percentage of assets under management, a fixed fee or hourly. Asset based fees are negotiable and can vary based on the total account value for each relationship. Fixed and hourly fees are negotiated at the time

of engagement. All fees are charged in arrears. Asset based and fixed fees are billed quarterly. Clients may choose to have fees deducted from assets or be billed. Hourly fees are billed monthly. Clients may terminate their contracts at any time by providing 60 days advance notice. A terminating client will be billed from the beginning of the current billing period to the termination date.

SVRS does not retain any commissions or compensation paid by investments held in client accounts. Any such compensation is used to reduce SVRS fees.

## Performance-Based Fees and Side-By-Side Management

SVRS does not charge performance-based fees and does not participate in side-by-side management of accounts.

## Types of Clients

SVRS provides investment consulting services to plan sponsors of qualified retirement plans and non-qualified deferred compensation plans.

SVRS has no initial account or maintenance minimums.

## Methods of Analysis, Investment Strategies and Risk of Loss

SVRS manages all accounts according to the client's IPS. The IPS sets specific criteria for each investment option. These criteria include: performance, risk, asset size, manager tenure and investment expenses.

There are specific risks associated with all SVRS' client investments. These risks vary depending on the type of investment. The primary investment risks are outlined below.

When client assets are substantially allocated to bonds and money market instruments, an investor is primarily subject to the following risks: interest rate risk, which is the chance that bond prices overall will decline because of rising interest rates; income risk, which is the chance that an underlying fund's income will decline because of falling interest rates; credit risk, which is the chance that the issuer of a security will fail to pay interest and principal in a timely manner, or that negative perceptions of the issuer's ability to make such payments will cause the price of that security to decline, thus reducing the underlying fund's return; and call risk, which is the chance that during periods of falling interest rates, issuers of callable bonds may call (repay) securities with higher coupons or interest rates before their maturity dates. An underlying fund would then lose potential price appreciation and would be

forced to reinvest the unanticipated proceeds at lower interest rates, resulting in a decline in the fund's income.

When client assets are substantially allocated to stocks, the investor is subject to stock market risk, which is the chance that stock prices overall will decline. Stock markets tend to move in cycles, with periods of rising prices and periods of falling prices. Investors may also be subject to the following risks associated with investments in foreign stocks: currency risk, which is the chance that the value of a foreign investment, measured in U.S. dollars, will decrease because of unfavorable changes in currency exchange rates; and regional risk, which is the chance that an entire region will be hurt by political upheaval, financial troubles, or natural disasters. Investors may also be subject to manager risk, which is the chance that poor security selection will cause the investment to underperform relevant benchmarks or other investments with a similar investment objective.

## Disciplinary Information

There are no legal or disciplinary events or actions against SVRS or its principals.

## Other Financial Industry Activities and Affiliations

The principals of SVRS are not registered with a broker-dealer. SVRS makes no recommendations as to its clients' affiliation with a specific broker-dealer. Each client is free to choose their own broker-dealer affiliation.

SVRS provides retirement plan consulting to plan sponsors of qualified retirement plans. These activities can include, but are not limited to, consulting related to plan design, nondiscrimination & compliance testing, plan administration, fiduciary responsibilities, and Form 5500 preparation.

## Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

SVRS representatives are not allowed to trade in client securities or securities recommended to clients under any circumstances. A summary of the SVRS Code of Ethics follows. A copy of the complete Code of Ethics is available upon request.

- Every supervised person, making any investment recommendation or taking any investment action, shall exercise diligence and thoroughness, and shall have a reasonable and adequate basis for any such recommendation or action.
- The supervised persons of SVRS shall conduct themselves in a manner consistent with the highest ethical standards. They shall avoid any action that

results in an actual or potential conflict of interest, or the appearance of a conflict of interest, which may be otherwise detrimental to the interests of their clients or SVRS.

- The supervised person must disclose all potential or actual conflicts of interest. The first preference and priority must be to avoid such conflicts of interest whenever possible, and where they unavoidably occur, to resolve them in a manner which is advantageous to the client.
- All supervised persons shall take steps reasonably necessary to provide that all account holdings of SVRS clients be kept confidential.
- All supervised persons shall comply strictly with procedures to ensure compliance with applicable Federal and State laws and regulations of Governmental agencies and self-regulatory organizations.

## Brokerage Practices

SVRS clients may choose their own broker-dealer. In the event, clients request a recommendation from SVRS, all recommendations will be made based on the broker-dealer's ability to provide access to a broad variety of mutual funds, minimize trading costs and provide exceptional client service.

SVRS does not retain any commissions or compensation paid by broker-dealers. Any such compensation is used to reduce client fees.

SVRS does not receive any benefit from any of the broker-dealers selected to hold client assets.

## Review of Accounts

Client accounts are reviewed continuously for changes in investment policy, management team or ownership. Fund performance and risk factors are reviewed quarterly for compliance with the IPS. Fund performance and risk factors are reviewed quarterly for compliance with the IPS. Reviewers include the chief compliance officer and the chief operations officer. Reports are reviewed with clients quarterly, semi-annually or annually.

Clients receive reports on a quarterly basis. They also receive written notice of any mutual funds placed on watch list, removed from watch list, or recommended for removal as they occur.

## Client Referrals and Other Compensation

SVRS does not receive any compensation for client referrals. SVRS does not directly or indirectly compensate any individuals from client fees received.

## Voting Client Securities

SVRS does not have the authority to vote client securities or proxies. Clients may receive proxies and solicitations directly from their broker-dealer or custodian. Clients may contact SVRS with questions about a particular solicitation.