

Part 2A of Form ADV: *Firm Brochure*

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This brochure provides information about the qualifications and business practices of Fiducioso Advisors, Inc. maker of Income Discovery (hereinafter “Income Discovery” or “firm” or “we”). If you have any questions about the contents of this brochure, please contact us at (917) 740-9190 or at manish@incomediscovery.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 Income Discovery is available on the SEC’s website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. The CRD number for Income Discovery is 157342. Registration with the Securities and Exchange Commission does not imply any level of skill or training.

Item 2. Summary of Material Changes

On July 21, 2010, the U. S. Securities and Exchange Commission (the "SEC") unanimously adopted a new Form ADV Part 2. The new Part 2, also known as the "Brochure" has 18 separate items that our firm must address, each of which requires disclosure on a distinct topic, and answers must be presented in the order of the items in the form, using the headings in the form. Our goal is to provide you with easy-to-understand "plain-English disclosure," using an easy-to-read format and definite, concrete, everyday words.

Our current Form ADV, Part 2 is available to our existing and prospective clients 24 hours a day through the Investment Adviser Public Disclosure website. Additionally, we annually and within 120 days of the end of our fiscal year, provide you either: (i) a copy of our Form ADV, Part 2 that includes or is accompanied by a summary of material changes; or (ii) a summary of material changes that includes an offer to provide a copy of the current Form ADV, Part 2. We urge you to carefully review all subsequent summaries of material changes, as they will contain important information about any significant changes to our advisory services, fee structure, business practices, conflicts of interest, and disciplinary history.

Item 3. Table of Contents

Item	Section	Page Number
1.	Cover Page	1
2.	Material Changes	2
3.	Table of Contents	3
4.	Advisory Business	4
5.	Fees and Compensation	5
6.	Performance-Based Fees and Side-by-Side Management	5
7.	Types of Clients	5
8.	Methods of Analysis, Investment Strategies and Risk of Loss	5
9.	Disciplinary Information	6
10.	Other Financial Industry Activities and Affiliations	6
11.	Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	8
12.	Brokerage Practices	9
13.	Review of Accounts	9
14.	Client Referrals and Other Compensation	9
15.	Custody	10
16.	Investment Discretion	10
17.	Voting Client Securities	10
18.	Financial Information	10

Item 4. Advisory Business

Income Discovery is a fee-based registered investment adviser which provides investment advice to all of its clients exclusively through an interactive website. The firm is registered with the SEC pursuant to Rule 203A-2(f) of the Investment Advisers Act of 1940. Our principal place of business is located in New York City, New York. We have been in business as an investment adviser since 2011, with Manish Malhotra, President and Chief Executive Officer as direct owner of the firm.

We do not manage client portfolios and do not have any discretionary or non-discretionary assets under management.

Asset Allocation Optimization Service

Through the interactive website (software), our firm provides consulting services to financial institutions and professionals. Our primary objective is to help these clients analyze different strategies for generating retirement income using a combination of Social Security claim strategies, systematic withdrawal portfolio model allocations, ladder of individual bonds held-to-maturity and longevity risk products (annuities). Our software helps these investment professionals address and demonstrate the dynamic risk - reward tradeoffs experienced by their clients during retirement lifestage.

Our software evaluates different allocations to Systematic Withdrawal Portfolios, Social Security claim strategies, Bond Ladder and annuities to find an optimum one. In addition to the optimization capability, the software lets the investment professional analyze a specific allocation (retirement income strategy) and compare the results side-by-side with previously analyzed allocations. The investment professional has discretion in selecting the allocations / retirement income strategies to be shared with their client (underlying account holder) and also in determining one of the strategies as *proposed*. Systematic Withdrawal Portfolios are portfolios of asset classes with uncertain returns from which the retiree makes periodic withdrawal to generate the cash flow needed during retirement. Bond Ladder consists of portfolio of fixed income instruments held to maturity to generate the periodic cash flow. Both fixed and variable annuities are also supported in the evaluation process.

Services in General:

Our investment recommendations are not limited to any specific product or service offered by a broker dealer or insurance company and primarily include advice regarding the optimal allocation of different asset classes such as equity, fixed income, and fixed and variable annuity products. Our recommendations are, however, limited by the universe of investment options entered by the client into the optimization program.

All investment recommendations are based on the information provided by an investment professional through our interactive website and are tailored to the underlying account holder. Our firm does not implement any recommendations. Investment professional utilizing the

platform remain solely responsible for collecting account holder suitability information, as well as for the evaluation and implementation of our recommendations.

Item 5. Fees and Compensation

Our advisory fees for consulting services described in Item 4 of this Brochure are charged as a fixed monthly fee of \$49 per client for the base version of the services and \$99 per client for premium version of the services. These fees are charged monthly in advance. Clients who sign up for an annual subscription may receive a discount. We reserve the right to change these programs and/or fees at any time, but will honor pre-paid fees.

Our monthly fees and minimums are generally not negotiable but may be discounted for annual subscribers. We also do bulk sales to multiple financial advisors through their broker-dealer firms. Per client (Financial Advisor) fees are discounted for these bulk sales.

Except for bulk sales to institutions such as broker-dealers, Registered Investment Advisors and Insurance Firms, we will not earn fees in excess of \$1,200 per client more than six months in advance of services rendered.

Account Termination:

Clients may terminate the agreement by providing us with a written notice at our principal place of business. Upon termination of any account, any prepaid, unearned fees will be promptly refunded. Clients receiving an annual subscription discount will be moved to a full monthly rate in case of early termination.

Brokerage and Custodial Fees:

In addition to the advisory fees paid to our firm, clients are also responsible for all transaction, brokerage, and custodial fees incurred as part of their account management. Please see Item 12 of this Brochure for important disclosures regarding our brokerage practices.

Item 6. Performance-Based Fees and Side-By-Side Management

We do not charge any fees based on a share of capital gains on or capital appreciation of client assets.

Item 7. Types of Clients

Our firm generally provides advisory services to investment firms and professionals such as investment advisers, investment adviser representatives, broker dealers, registered representatives, insurance companies and insurance brokers/agents.

We require a minimum monthly fee of \$49.

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

Our firm employs the following types of analysis to formulate client recommendations.

Asset Allocation Analysis: Rather than focusing on securities selection, we assist an investment professional in identifying an appropriate ratio of asset classes such as equities, fixed income and variable and fixed annuities in concert with Social Security claim strategy to guide a retiree in choosing a retirement income plan by making the risk-reward trade-off.

A risk of asset allocation is that the ratio of equity securities, fixed income securities, and annuity products will change over time due to stock and market movements and, if not corrected, will no longer be appropriate for the client's goals.

Monte Carlo Analysis:

Our optimum allocations are identified as the ones providing the desired retirement income at lesser risk when tested using Monte Carlo Simulation using historical sequence of returns or forward looking expectations. Monte Carlo simulation is a probabilistic approach to analyze an allocation under different set of potential future paths of inflation and asset class returns. The projections or other information generated by Monte Carlo analysis tools regarding the likelihood of various investment outcomes are hypothetical in nature, do not reflect actual investment results and are not guarantees of future results. Results may vary with each use and over time. The relevant calculations may be impacted greatly if assumed variables such as capital contributions, withdrawal amounts, inflation rates, expected rate of return, and volatility deviate from expectations.

Web-Based Analysis:

Our firm provides consulting advice exclusively through the use of an internet website. Web-based advice has significant limitations that prospective clients should consider before subscribing to advertised services. Specifically, in a web-based advisory arrangement, a client does not receive the benefits of face-to-face, telephone, or otherwise individualized interaction with his/her investment adviser, therefore limiting the client's ability to ask questions or relay important information. Moreover, such an arrangement also limits the ability of the adviser to assess the unique financial condition of each client, as well as each client's specific investment goals and objectives.

As stated in Item 4 of this Brochure, our firm does not manage client accounts, does not purchase or sell securities, and does not implement any advisory recommendations.

Clients should understand that investing in any securities, including mutual funds and ETFs, involves a risk of loss of both income and principal that a client should be prepared to bear.

Item 9. Disciplinary Information

Our firm has no reportable disciplinary events to disclose.

Item 10. Other Financial Industry Activities and Affiliations

Neither our firm nor our employees engage in any other financial industry activities or have any other financial industry affiliations.

Item 11. Code of Ethics, Participation in Client Transactions & Personal Trading

Code of Ethics Disclosure:

Our firm has adopted a Code of Ethics which sets forth high ethical standards of business conduct that we require of our employees, including compliance with applicable federal securities laws. Our Code of Ethics includes policies and procedures for the review of quarterly securities transactions reports as well as initial and annual securities holdings reports that must be submitted by the firm's access persons. Our Code of Ethics also requires the prior approval of any acquisition of securities in a limited offering (e.g., private placement) or an initial public offering. Our code provides for oversight, enforcement and recordkeeping provisions. A copy of our Code of Ethics is available to our advisory clients and prospective clients upon request to Manish Malhotra, Chief Compliance Officer, at the firm's principal office address.

Our firm or individuals associated with our firm may buy or sell securities identical to those recommended to clients for their personal accounts. In addition, any related person(s) may have an interest or position in a certain security(ies) which may also be recommended to a client. This practice results in a potential conflict of interest, as we may have an incentive to manipulate the timing of such purchases to obtain a better price or more favorable allocation in rare cases of limited availability.

To mitigate these potential conflicts of interest and ensure the fulfillment of our fiduciary responsibilities, we have established the following restrictions:

1. No principal or employee of our firm may buy or sell securities for their personal portfolio(s) where their decision is substantially derived, in whole or in part, by reason of his or her employment unless the information is also available to the investing public on reasonable inquiry. No principal or employee of our firm may prefer his or her own interest to that of the advisory client.
2. We do not implement client security transactions;
3. We maintain a list of all securities holdings for our firm and anyone associated with this advisory practice with access to advisory recommendations. These holdings are reviewed on a regular basis by Manish Malhotra, Chief Compliance Officer.
4. We emphasize the unrestricted right of the client to decline to implement any advice rendered.
5. All of our principals and employees must act in accordance with all applicable Federal and State regulations governing registered investment advisory practices.
6. Any individual not in observance of the above may be subject to disciplinary action or termination.

Item 12. Brokerage Practices

We do not have any formal or informal soft-dollar arrangements and do not receive any soft-dollar benefits.

As our firm does not implement investment recommendations for client accounts, we do not utilize or recommend the services of any broker dealers. Account holders and/or their selected investment advisers are responsible for selecting brokers and evaluating their execution capabilities. Therefore, account holders should refer to their investment advisers' disclosure documents for specific descriptions of their brokerage policies, including the ability to obtain best execution, as well as aggregation and allocation practices.

Item 13. Review of Accounts

Clients will receive customized reports detailing optimized asset allocation recommendations, retirement withdrawal rates and associated risk levels. The generation of these reports will be triggered by each client's entry of new information into our web-based platform. Our firm will not conduct any periodic or ongoing client account reviews.

Item 14. Client Referrals and Other Compensation

We may pay referral fees to third parties for referring advisory clients to our firm. Payment of referral fees for prospective client referrals creates a potential conflict of interest to the extent that such a referral is not unbiased and the solicitor is, at least partially, motivated by financial gain. Therefore, such a referral may be made even if our advisory services are not suitable to a particular client's needs or entering into an advisory relationship with us is not, overall, in the best interest of the client. As these situations represent a conflict of interest, we have established the following restrictions in order to ensure our fiduciary responsibilities:

1. All such referral fees are paid in accordance with the requirements of Rule 206(4)-3 of the Investment Advisers Act of 1940, and any corresponding state securities law requirements;
2. Any such referral fee will be paid solely from our investment management fee, and will not result in any additional charge to the client;
3. If the client is introduced to us by an unaffiliated solicitor, the solicitor, at the time of the solicitation, will disclose the nature of his/her/its solicitor relationship and provide each prospective client with a copy of our Form ADV Part 2 Brochure, together with a copy of the written disclosure statement from the solicitor to the client disclosing the terms of the solicitation arrangement between our firm and the solicitor, including the compensation to be received by the solicitor from us; and
4. All referred clients will be carefully screened to ensure that our fees and services are suitable to their objectives.

Item 15. Custody

Custody is defined as any legal or actual ability by our firm to access client funds or securities. As we do not manage client accounts, we do not have actual or constructive custody of client funds or securities.

Item 16. Investment Discretion

As we do not manage client accounts, we do not accept any investment discretion.

Item 17. Voting Client Securities

Our firm does not vote proxies on behalf of clients and does not provide clients with consulting assistance regarding proxy issues.

We do not advise or act on behalf of a client in legal proceedings involving companies whose securities are held in the client's account(s), including, but not limited to, the filing of "Proofs of Claim" in class action settlements.

Item 18. Financial Information

Except for bulk sales to institutions such as broker-dealers, Registered Investment Advisors and Insurance Firms, we will not earn fees in excess of \$1,200 per client more than six months in advance of services rendered.