



## **Allovest Advisory Services, LLC**

### **Form ADV Part 2A – Disclosure Brochure**

**Effective: February 10, 2015**

This Disclosure Brochure provides information about the qualifications and business practices of Allovest Advisory Services, LLC ("Allovest"). If you have any questions about the contents of this Disclosure Brochure, please contact us at (714) 676-5540 or by email at [info@allovest.com](mailto:info@allovest.com).

Allovest is a Registered Investment Advisor located in 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 through Allovest to assist you in determining whether to retain the Advisor.

Additional information about Allovest and its advisory persons are available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**Allovest Advisory Services, LLC**  
**CRD No: 167412**  
**17111 Beach Blvd #203B**  
**Huntington Beach, CA 92647**  
**Phone: (714) 676-5540**  
**<http://www.allovest.com/>**

## Item 2 – Material Changes

---

Form ADV 2 is divided into two parts: Part 2A (the "Disclosure Brochure") and Part 2B (the "Brochure Supplement"). The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about advisory personnel of Allovest.

Allovest believes that communication and transparency are the foundation of its relationship with Clients and will continually strive to provide its Clients with complete and accurate information at all times. Allovest encourages 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.

Allovest is an established Registered Investment Advisor; however, this is the initial filing of the Disclosure Brochure pursuant to the new regulations.

### Material Changes

Allovest provides services directly to individuals and other clients. Please see Item 4 for more information about the services provided by Allovest.

Allovest provides managed account services through Fidelity Institutional Wealth Services. Allovest also provides workshop seminars for a fixed fee. Please see Item 4 for more information about the services and Item 5 for more information about the fees for these services.

Allovest has updated the fees for the Investment Solutions service. Please see Item 5 for more details.

### 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 Allovest.

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](http://www.adviserinfo.sec.gov).

To review the firm information for Allovest:

- Click **Investment Advisor Search** in the left navigation menu.
- Select the option for **Firm** and enter **167412** (our firm's CRD number) in the field labeled "Firm Name or CRD# or SEC#" and click "Start Search".
- This will provide access to Form ADV Part 1 and Part 2.
- Item 11 of the Form 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 (714) 676-5540 or by email at [info@allovest.com](mailto:info@allovest.com).

### Item 3 – Table of Contents

---

<b>Item 1 – Cover Page .....</b>	<b>1</b>
<b>Item 2 – Material Changes .....</b>	<b>2</b>
<b>Item 3 – Table of Contents .....</b>	<b>3</b>
<b>Item 4 – Advisory Services.....</b>	<b>4</b>
A. Firm Information .....	4
B. Advisory Services Offered .....	4
C. Client Account Management .....	6
D. Wrap Fee Programs .....	7
E. Assets Under Management .....	7
<b>Item 5 – Fees and Compensation .....</b>	<b>7</b>
A. Fees for Advisory Services .....	7
B. Fee Billing.....	8
C. Other Fees and Expenses.....	8
D. Advance Payment of Fees and Termination .....	9
E. Compensation for Sales of Securities .....	10
<b>Item 6 – Performance-Based Fees and Side-By-Side Management .....</b>	<b>10</b>
<b>Item 7 – Types of Clients .....</b>	<b>10</b>
<b>Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss.....</b>	<b>10</b>
A. Methods of Analysis .....	10
B. Risk of Loss .....	11
<b>Item 9 – Disciplinary Information.....</b>	<b>13</b>
<b>Item 10 – Other Financial Industry Activities and Affiliations .....</b>	<b>13</b>
<b>Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.....</b>	<b>13</b>
A. Code of Ethics .....	13
B. Personal Trading with Material Interest.....	13
C. Personal Trading in Same Securities as Clients .....	13
D. Personal Trading at Same Time as Client.....	14
<b>Item 12 – Brokerage Practices .....</b>	<b>14</b>
A. Recommendation of Custodian[s] .....	14
B. Aggregating and Allocating Trades .....	15
<b>Item 13 – Review of Accounts.....</b>	<b>15</b>
A. Frequency of Reviews .....	15
B. Causes for Reviews.....	15
C. Review Reports .....	15
<b>Item 14 - Client Referrals and Other Compensation .....</b>	<b>15</b>
A. Compensation Received by Allovest.....	15
B. Client Referrals from Solicitors .....	16
<b>Item 15 – Custody .....</b>	<b>16</b>
<b>Item 16 – Investment Discretion .....</b>	<b>16</b>
<b>Item 17 – Voting Client Securities .....</b>	<b>16</b>
<b>Item 18 – Financial Information .....</b>	<b>16</b>
<b>Form ADV Part 2B – Brochure Supplement .....</b>	<b>17</b>
<b>Privacy Policy .....</b>	<b>21</b>

## **Item 4 – Advisory Services**

---

### **A. Firm Information**

Allovest Advisory Services, LLC (“Allovest” or the “Advisor”) is a Registered Investment Advisor located in the State of California, which is organized as a Limited Liability Company (“LLC”) under the laws of the State of California and is registered as investment adviser with the U.S. Securities and Exchange Commission (“SEC”). Allovest was founded in September 2013, and is owned and operated by Founder and CEO, Maria Kutscher. This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by Allovest.

### **B. Advisory Services Offered**

Allovest offers investment advisory services to individuals, high net worth individuals, institutions and other advisors in State of California and other states (each referred to as a “Client”).

#### Guided Solutions

Allovest offers an online web-based tool called Guided Solutions, which is available for use by all visitors to the Allovest website, for no cost or fee to the visiting user (“User”). Users of the Allovest website can use Guided Solutions to complete a brief online personal profile, risk questionnaire, and statement of retirement goals, and then the User is presented with the Retirement Solutions Planner, the website page where the User can input five different variables to complete the analysis to receive a general asset allocation based on the input. Users are also provided with an estimate of whether or not they are on track to reach their provided retirement goals, based on the difference between the required rate of return needed to reach their retirement goals and the estimated rate of return on their retirement assets.

Guided Solutions also generates a report that includes a strategic asset allocation percentage mix of six asset classes to help guide the User on investment categories that may be suitable given their provided input. Guided Solutions does not provide fund-specific recommendations. Guided Solutions and the recommendations generated do not constitute investment advice under the Adviser’s Act.

#### Investment Solutions Service

Allovest provides an enhanced version of its online web-based tool service, where visitors to the Allovest website can engage with Allovest for fund-specific recommendations of their asset allocation, and additional advice for their specific profile as needed. Investment Solutions service is designed for Clients who want to have control over their own retirement account and decisions with the assistance of the online tool and investment advice.

Investment Solutions service provides Clients with the Retirement Solutions Planner and personal retirement plan similar to the Guided Solutions service described above, target portfolio assignment and asset allocation, investment advice as to specific mutual funds or exchange traded funds (“ETFs”) in which to invest, quarterly investment advice updates by email, and a personalized online educational program.

Clients engaged for the Investment Solutions service will receive target portfolio assignment and asset allocation as noted above, where Allovest utilizes seven target portfolios with equity components ranging from 30 to 90 percent. Clients are assigned one of these target portfolios based on their age and risk tolerance. The target portfolios consist of up to six asset classes: U.S. large cap stocks, U.S. small-mid cap stocks, international stocks, core fixed income, Treasury Inflation Protected Securities (TIPS), and cash.

The advice and recommendations provided through the Guided Solutions and Investment Solutions services are estimates only based on the responses or other information provided by or about the participant. Allovest does not make any guarantee or warranty, express or implied, as to the accuracy, timeliness, or completeness of such information. The Guided Solutions and Investment Solutions services are also subject to the general market and financial conditions existing at the time of such usage.

---

#### **Allovest Advisory Services, LLC**

17111 Beach Blvd #203B \* Huntington Beach, CA 92647

Phone: (714) 676-5540

info@allovest.com

The retirement goals 'puzzle' and investment advice recommendations provided by the Guided Solutions and Investment Solutions services are not a guarantee of future results and are not a guarantee that a User and/or Client will achieve their retirement goals. The Guided Solutions and Investment Solutions services should only be used by Users and/or Clients as a tool in their retirement planning and not as a substitute for their own informed judgment. Allovest does not have an obligation to update any information for a specific individual or to proactively contact the individual to obtain updated information. A failure by an individual to review and update account information through the Guided Solutions and Investment Solutions services may materially affect the content and value of services received from Allovest.

#### Managed Solutions service

Allovest maintains a series of mutual fund and ETF model portfolios that they offer to Clients as a Managed Account service called Managed Solutions. Allovest customizes model portfolio recommendations for unaffiliated investment advisors and its clients, which can engage with Allovest to have a portion of their assets managed by Allovest in one of the available model portfolios. Allovest provides due diligence and monitoring of the fund lineup, maintains the model portfolios, and makes quarterly tactical allocations to the sub-asset classes within each model. Allovest will work with each Client in determining the appropriate model series and specific model portfolio in which to invest. Allovest may also provide the following services for Clients engaged for Managed Solutions:

- Creation of an Investment Policy Statement (IPS) consistent with their goals and objectives;
- Selection of managers and funds and implementation of investment strategy;
- Ongoing manager and mutual fund review and due diligence;
- Replacement of managers and funds, as necessary;
- Provide quarterly detailed review of investment performance;
- Rebalance of asset allocation as appropriate; and
- Tax-loss harvesting.

Allovest evaluates and selects investments for inclusion in Client portfolios only after applying its internal due diligence process. Allovest may recommend, on occasion, redistributing investment allocations to diversify the portfolio. Allovest may recommend specific positions to increase sector or asset class weightings. The Advisor may recommend employing cash positions as a possible hedge against market movement, which may adversely affect the portfolio. Allovest 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, generating cash to meet Client needs, or any risk deemed unacceptable for the Client's risk tolerance.

**Prior to rendering investment advisory services, Allovest will ascertain, in conjunction with the Client, the Client's financial situation, risk tolerance, and investment objective[s].**

Allovest will provide investment advisory services and portfolio management services and will not provide securities custodial or other administrative services. At no time will Allovest accept or maintain custody of a Client's funds or securities, except for authorized deduction of the Advisor's fees. All Client assets will be managed within their designated brokerage account or pension account, pursuant to the Client Investment Advisory Agreement.

#### Financial Planning and Consulting Services

Allovest will typically provide a variety of financial planning services to individuals and families, pursuant to a written Financial Planning or Consulting Agreement. Services are offered in several areas of a Client's financial situation, depending on their goals, objectives and financial situation.

Generally, such financial planning services will involve preparing a financial plan or rendering a financial consultation based on the Client's financial goals and objectives. This planning or consulting may encompass

one or more areas of need, including, but not limited to investment planning, retirement planning, personal savings, education savings and other areas of a Client's financial situation.

A financial plan developed for or financial consultation rendered to the Client will usually include general recommendations for a course of activity or specific actions to be taken by the Client. For example, recommendations may be made that the Client start or revise their investment programs, commence or alter retirement savings, establish education savings and/or charitable giving programs. Allovest may also refer Clients to an accountant, attorney or other specialist, as appropriate for their unique situation. For certain financial planning engagements, the Advisor will provide a written summary of Client's financial situation, observations, and recommendations. For consulting or ad-hoc engagements, the Advisor may not provide a written summary. Plans or consultations are typically completed within six months of contract date, assuming all information and documents requested are provided promptly.

Financial planning and consulting recommendations may pose a potential conflict between the interests of the Advisor and the interests of the Client. For example, a recommendation to engage the Advisor for investment management services or to increase the level of investment assets with the Advisor would pose a conflict, as it would increase the advisory fees paid to the Advisor. Clients are not obligated to implement any recommendations made by the Advisor or maintain an ongoing relationship with the Advisor. If the Client elects to act on any of the recommendations made by the Advisor, the Client is under no obligation to effect the transaction through the Advisor.

#### Seminar Services

Allovest provides workshop seminars for certain, specific engagements where individuals can receive general information about how to navigate their finances after important life events such as divorce.

#### Outsourced CIO Services

Allovest also provides pension consulting and sub-advisory services to unaffiliated investment advisors, which may include the following services based on the agreement signed with the unaffiliated investment advisor:

- General investment guidance and advice relating to the Client's retirement plan business
- Investment manager and fund research, due diligence and reporting
- Opinions, analysis, and recommendations on retirement fund lineups
- Creation, due diligence and monitoring of mutual fund and ETF model portfolios
- Preparation and delivery of model portfolio research, performance and commentary
- Provide plan-specific 401k fund recommendations based on standard risk-based model portfolios
- Trading, execution and re-balancing of mutual fund and ETF securities within model portfolios

Allovest typically does not have any knowledge of the identities or financial situation of the underlying client of the unaffiliated investment advisor Client, and, therefore, the service is not tailored to a specific client's needs.

### **C. Client Account Management**

Prior to engaging Allovest to provide either the Investment Solutions or Managed Solutions 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:

- Establishing an Investment Policy Statement – Allovest, in connection with the Client, may develop a statement that summarizes the Client's investment goals and objectives along with the broad strategy[ies] to be employed to meet the objectives. An Investment Policy Statement generally includes specific information on the Client's stated goals, time horizon for achieving the goals, investment strategies, Client risk tolerance and any restrictions imposed by the Client.
- Asset Allocation – Allovest will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation and tolerance for risk for each Client.

---

#### **Allovest Advisory Services, LLC**

17111 Beach Blvd #203B \* Huntington Beach, CA 92647

Phone: (714) 676-5540

info@allovest.com

- Portfolio Construction – Allovest will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – Allovest may provide investment management and ongoing oversight of the Client's portfolio and overall account.

#### **D. Wrap Fee Programs**

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

#### **E. Assets Under Management**

As of January 1, 2015, the most recent date for which such calculations are provided pursuant to securities regulations, Allovest manages the following assets:

<b>Assets Under Management</b>	<b>Assets</b>
Discretionary Assets	--
Non-Discretionary Assets	\$134,013,698
<b>Total</b>	<b>\$134,013,698</b>

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 services provided by the Advisor. Each Client shall sign an Investment Advisory Agreement that details the responsibilities of Allovest and the Client.

#### **A. Fees for Advisory Services**

##### Guided Solutions

There is no fee charged for Users to visit Allovest's website and use the web-based tool.

##### Investment Solutions Service

Allovest charges a flat fee, payable in advance, of \$79.95 per year for subscribers to access the Investment Solutions program. Subscribers who have multiple plans (i.e., 401k, IRA, etc.) for which they would like investment advice may add additional plans at the additional flat fee of \$59.95 each, payable annually in advance. There must always be a primary plan charged at the regular subscription price of \$79.95 in order for the additional plan(s) price of \$59.95 to be applied.

##### Managed Solutions Service

Investment Advisory Fees for the Managed Solutions service are paid quarterly in arrears pursuant to the terms of the Investment Advisory Agreement.

Investment Advisory Fees are based on the market value of assets under management at the end of each calendar quarter. Investment Advisory Fees range from 1.00% to 1.50% based on the following schedule:

<b>Assets Under Management</b>	<b>Annual Rate</b>
\$0 to \$500,000	1.50%
\$500,001 to \$1,000,000	1.25%
\$1,000,001 and Up	1.00%

---

#### **Allovest Advisory Services, LLC**

17111 Beach Blvd #203B \* Huntington Beach, CA 92647

Phone: (714) 676-5540

info@allovest.com



The Client may be able to attain similar services for a lower fee from other service providers.

#### Financial Planning and Consulting Services

Allovest offers financial planning or consulting services to individuals on an hourly basis up to \$200 per hour, or on a fixed fee basis, which may be negotiable depending on the nature and complexity of each Client's circumstances. If on an hourly basis, an estimate for total hours will be determined prior to establishing the advisory relationship.

#### Seminar Services

Allovest charges a flat fee for participating in their workshop seminars which typically cost \$45 per participant.

#### Outsourced CIO Services

Allovest offers financial planning or consulting services to unaffiliated investment advisors on an hourly basis up to \$200 per hour, or on a fixed fee basis, or on a percentage of assets under management basis, all of which may be negotiable depending on the nature and complexity of each Client's circumstances. If on an hourly basis, an estimate for total hours will be determined prior to establishing the advisory relationship.

The Advisor's fee is exclusive of, and in addition to, brokerage fees, transaction fees, and other related costs and expenses, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs. The hourly fees are determined after considering many factors, such as the level and scope of the services.

### **B. Fee Billing**

#### Investment Solutions Service

Annual online subscriber fees are charged in advance, through electronic payment methods designated by Allovest, and are non-refundable. Subscribers will be set up for automatic renewal.

#### Managed Solutions Service

Investment Advisory Fees will be automatically deducted from the Client Account by the Custodian. Clients participating in the Managed Solutions service will be billed quarterly in arrears in accordance with the Investment Advisory Agreement with the Advisor. 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 quarter end date. The amount due is calculated by applying the quarterly rate (annual rate divided by 4) to the total assets under management with Allovest at the end of each quarter. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the Investment Advisory 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 Allovest 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.

#### Financial Planning and Consulting Services

Financial planning and consulting fees are invoiced by the Advisor and are due upon receipt of the agreed upon deliverable.

#### Outsourced CIO Services

Pension Consulting and Sub-Advisory fees are invoiced by the Advisor and are due upon receipt. Fees are typically calculated quarterly or monthly on an ongoing basis and the Client billed accordingly, per the terms of the Client agreement.

### **C. Other Fees and Expenses**

---

#### **Allovest Advisory Services, LLC**

17111 Beach Blvd #203B \* Huntington Beach, CA 92647

Phone: (714) 676-5540

info@allovest.com



Clients may incur certain fees or charges imposed by third parties, other than Allovest, in connection with investments 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 Allovest is separate and distinct from these custodian and execution fees.

In addition, all fees paid to Allovest for investment advisory services are separate and distinct from the expenses charged by mutual funds and exchange-traded funds to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client could invest in these products directly, without the services of Allovest, but would not receive the services provided by Allovest which are designed, among other things, to assist the Client in determining which products or services are most appropriate for each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by Allovest to fully understand the total fees to be paid.

#### **D. Advance Payment of Fees and Termination**

##### Investment Solutions service

Allovest is compensated for its services in advance of the year in which investment advisory services are rendered. Clients may request to terminate their Investment Advisory Agreement with Allovest, in whole or in part, by providing advance written notice. Clients may terminate their agreement and receive a full refund by notifying Allovest through the online system, or by sending an email to Allovest, within their first 30 days of signing the agreement. Investment Solutions Clients will automatically renew their service annually from the date of subscription. Allovest will provide subscribers with notice of renewal approximately one month prior to the end of the term. Online subscribers who terminate their subscription after the first 30 days will not receive a refund of the upfront fee, or any portion of the annual fee, but may re-access their account through the remainder of the contract term. Clients who choose not to renew their subscription may do so as provided through the online system or by sending an e-mail to Allovest.

##### Managed Solutions service

The Client may terminate the agreement for Managed Solutions within five (5) business days of signing the agreement at no cost to the Client. If the termination request is received after the first five (5) business days of signing the Advisor's agreement, the Client shall be responsible for Investment Advisory Fees up to and including the effective date of termination. Upon termination, the Advisor will refund any unearned, prepaid Investment Advisory Fees from the effective date of termination to the end of the quarter. The Client's Investment Advisory Agreement with the Advisor is non-transferable without the Client's written approval.

##### Financial Planning and Consulting Services

In the event that a Client should wish to cancel the financial planning agreement under which any plan is being created, the Client shall be billed for actual hours logged on the planning project times the agreed upon hourly rate. Any surplus in the Advisor's possession as the result of collecting a deposit at the time of signing the financial planning agreement will be returned to the Client within 5 business days of cancellation.

Either party may terminate a planning or consulting agreement at any time by providing written notice to the other party. In addition, the Client may terminate the agreement within five (5) days of signing the Advisor's financial planning or consulting agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Refunds will be given on a pro rata basis.

##### Outsourced CIO Services

Either party may terminate a pension consulting and sub-advisory agreement at any time by providing written notice to the other party 60 days in advance. In addition, the Client may terminate the agreement within five (5) days of

---

##### **Allovest Advisory Services, LLC**

17111 Beach Blvd #203B \* Huntington Beach, CA 92647

Phone: (714) 676-5540

info@allovest.com

signing the Advisor's pension consulting and sub-advisory agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Refunds will be given on a pro rata basis. Any surplus in the Advisor's possession as the result of collecting a deposit at the time of signing the pension consulting and sub-advisory agreement will be returned to the Client within five (5) business days of cancellation.

#### **E. Compensation for Sales of Securities**

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

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

---

Allovest does not charge performance-based fees for its investment advisory services. The fees charged by Allovest are as described in "Item 5 – Fees and Compensation" above and are not based upon the capital appreciation of the funds or securities held by any Client.

Allovest does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

### **Item 7 – Types of Clients**

---

Allovest provides investment advisory services to individuals high net worth individuals, institutions and other advisors. The relative percentage of each type of Client is available on Allovest's Form ADV Part 1. These percentages will change over time.

Allovest generally does not impose a minimum account size for establishing a relationship. However, Allovest will require a minimum of 10 Plan Participants in order to engage Allovest for any discounted Plan Sponsor service that includes Investment Solutions or Managed Solutions .

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

---

#### **A. Methods of Analysis**

##### General Investment Strategy

Allovest generally uses diversification in an effort to minimize risk and optimize the potential return for its model portfolios. More specifically, we seek to provide diversification by investing each portfolio, in varying allocations, in multiple asset classes, such as U.S. large cap stocks, U.S. small-to-mid cap stocks, international stocks, REITs, core fixed income, TIPS, and cash. Assignment to a target portfolio is determined for each client in accordance with the clients' investment objectives, risk tolerance, and time horizon, as inputted by the client in our online service, or through a risk assessment analysis with an Allovest financial advisor.

##### Methods of Analysis for Selecting Securities

Allovest 401(k) Investment Solutions – for your Work Retirement Plan (includes 401(k), 403(b), 457, TSP and other defined contribution plans)  
Allovest uses a fundamental, proprietary fund filter that incorporates a multi-factor approach in the selection of mutual funds for its seven target portfolios, which includes an analysis and ranking of fees and expenses, performance, style consistency, and duration for fixed income funds.

Allovest IRA Investment Solutions – for your Individual Retirement Account

(includes Traditional IRA, Rollover IRA, Roth IRA, SEP IRA, and other personal retirement accounts)

Allovest Target ETF Portfolios utilize a proprietary selection process for selecting the ETF's, which includes the following criteria: passive index, style purity, expense ratio, and inception date.

In addition to providing subscribers with an appropriate Allovest Target ETF Portfolio, subscribers will also receive a matrix with equivalent ETFs for a majority of the asset classes that are available through commission-free ETF trading programs in the U.S. An equivalent ETF is defined as an ETF with an underlying benchmark that is also widely accepted as a representative for that particular asset class. Please note that the matrix will change over time as firms eliminate or add core asset classes to their commission-free ETF trading programs. ETF screens will be updated quarterly, with any updated recommendations included in quarterly advice notifications to existing subscribers.

#### Specific Investment Strategies for Constructing Target Portfolios

Allovest utilizes Modern Portfolio Theory, which has a basic concept of using diversification in an effort to help minimize risk and optimize the potential return of a portfolio. In addition, the concepts underlying the Brinson, Hood, Beebower (BHB) asset allocation study, in which asset allocation was found to explain more than 90% of the volatility of returns of an overall portfolio, also contributed to the design of the Allovest target portfolios. Allovest also incorporates non-quantitative factors and judgment in its methodology.

#### Additional Strategies

While Allovest does not specifically use the investment strategies listed below, Allovest may recommend mutual funds or ETFs who use these strategies in their management of the funds or accounts. These may include but are not limited to the following:

- Tactical asset allocation
- Cash as a strategic asset
- Short-term trading
- Short-selling
- Option strategies
- Market timing
- Trend methodology
- Defensive strategies
- Hedging
- Leverage
- Margin
- Inverse/enhanced market strategies
- Reverse convertible notes
- Concentrated portfolios

#### **B. Risk of Loss**

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. Allovest will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals. More details on the Advisor's review process are included below in "Item 13 – Review of Accounts".

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided

---

**Allovest Advisory Services, LLC**

17111 Beach Blvd #203B \* Huntington Beach, CA 92647

Phone: (714) 676-5540

info@allovest.com

information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process.

Allovest may use margin in Client accounts to manage the timing of purchases and sales, as appropriate. Allovest may employ options strategies to hedge or gain additional exposure to a particular asset class or sector. Allovest's investment strategy encompasses active trading in concentrated portfolios. Following are some of the risks associated with Options, Margin and Short-Sale transactions:

#### Options Contracts

Investments in options contracts have the risk of losing value in a relatively short period of time. Option contracts are leveraged instruments that allow the holder of a single contract to control many shares of an underlying stock. This leverage can compound gains or losses.

#### Margin Borrowings

The use of short-term margin borrowings may result in certain additional risks to a Client. For example, if securities pledged to brokers to secure a Client's margin accounts decline in value, the Client could be subject to a "margin call", pursuant to which it must either deposit additional funds with the broker or be the subject of mandatory liquidation of the pledged securities to compensate for the decline in value.

#### Short Sales

A short sale involves the sale of a security that the Client does not own in the hope of purchasing the same security at a later date at a lower price. To make delivery to the buyer, the Client must borrow the security and is obligated to return the security to the lender, which is accomplished by a later purchase of the security. The Client realizes a profit or a loss as a result of a short sale if the price of the security decreases or increases respectively between the date of the short sale and the date on which the Client covers its short position, i.e., purchases the security to replace the borrowed security. A short sale involves the theoretically unlimited risk of an increase in the market price of the security that would result in a theoretically unlimited loss.

#### Alternative Investments (Limited Partnerships)

The performance of alternative investments (limited partnerships) can be volatile and may have limited liquidity. An investor could lose all or a portion of their investment. Such investments often have concentrated positions and investments that may carry higher risks. Client should only have a portion of their assets in these investments.

#### Concentrated Portfolios

Concentrated portfolios are an aggressive and highly volatile approach to trading and investing and should be viewed as complementary to a stable, highly predictable investment approach. Concentrated portfolios hold fewer different stocks than a diversified portfolio and are much more likely to experience sudden dramatic price swings. In addition, the rise or drop in price of any given holding in the portfolio is likely to have a larger impact on portfolio performance, than a more broadly diversified portfolio.

#### Frequent Trading

Frequent trading in securities can result in higher transaction costs in the Client's account[s]. For taxable accounts, frequent trading can also result in taxable transactions each year that would not be present in a buy-and-hold strategy. There are no guarantees that a frequent trading strategy will correctly time purchases and sales of any particular security.

---

#### **Allovest Advisory Services, LLC**

17111 Beach Blvd #203B \* Huntington Beach, CA 92647

Phone: (714) 676-5540

info@allovest.com

**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 (714) 676-5540 or via email at [info@allovest.com](mailto:info@allovest.com).**

## **Item 9 – Disciplinary Information**

---

**There are no legal, regulatory or disciplinary events involving Allovest or any of its employees.** Allovest 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 with whom you partner. Our backgrounds are on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

To review the firm information contained in Form ADV Part 1, select the option for “Investment Adviser Search”, then selecting “Firm” and enter **167412** in the field labeled “Firm Name or CRD# or SEC#”. This will provide access to Form ADV Parts 1 and 2. Item 11 of the Form ADV Part 1 lists legal and disciplinary disclosure questions.

You may also research the background of Maria Kutscher by selecting the option for “Investment Adviser Search”, then selecting “Individual” and entering Ms. Kutscher’s individual CRD number **1844674** in the field labeled “Individual Name or CRD#”.

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

---

As noted in Item 4, the Advisor may select unaffiliated money managers to assist with the implementation of a Client’s investment strategy. In such arrangements, the Advisor will receive a portion of the investment advisory fees collected by the unaffiliated money managers from the Client. The Advisor will not charge its own investment advisory fee for assets referred to an unaffiliated money manager.

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

---

### **A. Code of Ethics**

Allovest has implemented a Code of Ethics that defines our fiduciary commitment to each Client. This Code of Ethics applies to all persons associated with Allovest. The Code of Ethics was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. Allovest and its personnel owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of Allovest 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 address employee ethics and conflicts of interest. To request a copy of our Code of Ethics, please contact us at (714) 676-5540 or via email at [info@allovest.com](mailto:info@allovest.com).

### **B. Personal Trading with Material Interest**

Allovest allows our employees to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Allovest does not act as principal in any transactions. In addition, the Advisor does not act as the general partner of a fund, or advise an investment company. Allovest does not have a material interest in any securities traded in Client accounts.

### **C. Personal Trading in Same Securities as Clients**

Allovest 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. When trading for personal accounts, employees of Allovest may have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can

---

**Allovest Advisory Services, LLC**

17111 Beach Blvd #203B \* Huntington Beach, CA 92647

Phone: (714) 676-5540

[info@allovest.com](mailto:info@allovest.com)

potentially be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material non-public information. This risk is mitigated by Allovest requiring reporting of personal securities trades by its employees for review by the employee's supervisor or the CCO. We have also adopted written policies and procedures to detect the misuse of material, non-public information.

In addition the Code of Ethics governs Gifts and Entertainment given by and provided to the Advisor, outside employment activities of employees, Employee reporting, sanctions for violations of the Code of Ethics, and records retention requirements for various aspects of the Code of Ethics.

#### **D. Personal Trading at Same Time as Client**

While Allovest allows our employees to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades are typically aggregated with Client orders or traded afterwards.

**At no time will Allovest, or any associated person of Allovest, transact in any security to the detriment of any Client.**

### **Item 12 – Brokerage Practices**

---

#### **A. Recommendation of Custodian[s]**

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

Where Allovest 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 Allovest.

Allovest 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. Allovest 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. **Allovest does not participate in soft dollar programs sponsored or offered by any broker-dealer.**

**2. Brokerage Referrals** - Allovest 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 Allovest 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, Allovest 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.

---

**Allovest Advisory Services, LLC**

17111 Beach Blvd #203B \* Huntington Beach, CA 92647

Phone: (714) 676-5540

info@allovest.com



## **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. Allovest will execute its transactions through an unaffiliated broker-dealer selected by the Client. Allovest 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**

Accounts are monitored on a regular and continuous basis by Ms. Kutscher, Founder and CEO of Allovest. 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 Allovest if changes occur in the Client's personal financial situation that might adversely affect the Client's 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 Allovest**

#### Participation in Institutional Advisor Platform

The Advisor has established an institutional relationship with Fidelity Institutional Wealth Services ("Fidelity IWS") to assist the Advisor in managing Client account[s]. Access to the Fidelity Institutional platform is provided at no charge to the Advisor. The Advisor receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets at Fidelity IWS. The software and related systems support may benefit the Advisor, but not its Clients directly. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a custodian creates a potential conflict of interest since these benefits may influence the Advisor's recommendation of this custodian over one that does not furnish similar software, systems support, or services.

Additionally, the Advisor may receive the following benefits from Fidelity IWS: receipt of duplicate Client confirmations and bundled duplicate statements; access to a trading desk that exclusively services its institutional participants; access to block trading which provides the ability to aggregate securities transactions

---

**Allovest Advisory Services, LLC**

17111 Beach Blvd #203B \* Huntington Beach, CA 92647

Phone: (714) 676-5540

info@allovest.com



and then allocate the appropriate shares to Client accounts; and access to an electronic communication network for Client order entry and account information.

#### **B. Client Referrals from Solicitors**

Allovest does not engage paid solicitors for Client referrals.

### **Item 15 – Custody**

---

Allovest does not accept or maintain custody of any Client accounts, except for the authorized deduction of the advisor's fee. 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 Allovest to utilize that custodian for the Client's security transactions. Allovest encourages Clients to review statements provided by the account custodian. For more information about custodians and brokerage practices, see "Item 12 - Brokerage Practices".

### **Item 16 – Investment Discretion**

---

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

### **Item 17 – Voting Client Securities**

---

Allovest does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. The Advisor will assist in answering questions relating to proxies, however, the Client retains the sole responsibility for proxy decisions and voting.

### **Item 18 – Financial Information**

---

Neither Allovest, nor its management, have any adverse financial situations that would reasonably impair the ability of Allovest to meet all obligations to its Clients. Neither Allovest, nor any of its advisory persons, has been subject to a bankruptcy or financial compromise. Allovest is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect fees of \$1,200 or more for services to be performed six months or more in advance.



## **Form ADV Part 2B – Brochure Supplement**

**for**

**Maria Kutscher, CFA, CFP, CRPC®, AAMS®  
Founder and CEO**

**Effective: February 10, 2015**

This Brochure Supplement provides information about the background and qualifications of Maria Kutscher (CRD# **1844674**) in addition to the information contained in the Allovest Advisory Services, LLC (“Allovest” or the “Advisor”) (CRD # 167412) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Allovest Disclosure Brochure or this Brochure Supplement, please contact us at (714) 676-5540 or by email at [info@allovest.com](mailto:info@allovest.com).

Additional information about Ms. Kutscher is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

---

**Allovest Advisory Services, LLC**  
17111 Beach Blvd #203B \* Huntington Beach, CA 92647  
Phone: (714) 676-5540  
[info@allovest.com](mailto:info@allovest.com)

## Item 2 – Educational Background and Business Experience

---

Maria Kutscher, born in 1963, is dedicated to advising Clients of Allovest in her role as the Founder and CEO of Allovest.

Ms. Kutscher earned a MBA from St. Mary's College in 1994. Ms. Kutscher earned a BS in Finance from California State University, Long Beach in 1988. Additional information regarding Ms. Kutscher's employment history is included below.

### Employment History:

CEO and CCO, Allovest Advisory Services, LLC	09/2013 to Present
Regional Director, American Century Investment Services	02/2008 to 08/2013
Managing Regional Director, Natixis Asset Management Advisors	07/2006 to 01/2008
Sr. Key Account Manager, AIM Distributors, Inc.	05/2000 to 07/2006
Advisory Representative, AIM Private Asset Management, Inc.	02/2002 to 07/2006
Regional Director, PaineWebber Incorporated	04/1988 to 05/2000

### Professional Designation: Chartered Financial Analyst ("CFA")

The Chartered Financial Analyst ("CFA") charter is a professional designation established in 1962 and awarded by CFA Institute. To earn the CFA charter, candidates must pass three sequential, six-hour examinations over two to four years. The three levels of the CFA Program test a wide range of investment topics, including ethical and professional standards, fixed-income analysis, alternative and derivative investments, and portfolio management and wealth planning. In addition, CFA charterholders must have at least four years of acceptable professional experience in the investment decision-making process and must commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

### Professional Designation: Certified Financial Planner ("CFP")

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to

---

#### Allovest Advisory Services, LLC

17111 Beach Blvd #203B \* Huntington Beach, CA 92647

Phone: (714) 676-5540

info@allovest.com

test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;

- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP® Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

#### **Professional Designation: Chartered Retirement Planning Counselor ("CRPC®")**

Individuals who hold the CRPC® designation have completed a course of study encompassing pre-and post-retirement needs, asset management, estate planning and the entire retirement planning process using models and techniques from real client situations. Additionally, individuals must pass an end-of-course examination that tests their ability to synthesize complex concepts and apply theoretical concepts to real-life situations. All designees have agreed to adhere to Standards of Professional Conduct and are subject to a disciplinary process. Designees renew their designation every two-years by completing 16 hours of continuing education, reaffirming adherence to the Standards of Professional Conduct and complying with self-disclosure requirements.

#### **Professional Designation: Accredited Asset Management Specialist ("AAMS®")**

Individuals who hold the AAMS® designation have completed a course of study encompassing investments, insurance, tax, retirement, and estate planning issues. Additionally, individuals must pass an end-of-course examination that tests their ability to synthesize complex concepts and apply theoretical concepts to real-life situations. All designees have agreed to adhere to Standards of Professional Conduct and are subject to a disciplinary process. Designees renew their designation every two-years by completing 16 hours of continuing education, reaffirming adherence to the Standards of Professional Conduct and complying with self-disclosure requirements. More information regarding the AAMS is available at <http://cffpdesignations.com>.

### Item 3 – Disciplinary Information

---

***There are no legal, civil or disciplinary events to disclose regarding Ms. Kutscher.***

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 Ms. Kutscher that would create a material impact to a client or prospective client.***

However, we do encourage you to independently view the background of Ms. Kutscher on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Select “Investment Adviser Search” from the left navigation menu. Then select the option for “Individual” and enter **1844674** in the field labeled “Individual Name or CRD#”.

### Item 4 – Other Business Activities

---

Ms. Kutscher is dedicated to the investment advisory activities of Allovest’s Clients. Ms. Kutscher does not have any other business activities.

### Item 5 – Additional Compensation

---

Ms. Kutscher is dedicated to the investment advisory activities of Allovest’s Clients. Ms. Kutscher does not receive any additional forms of compensation.

### Item 6 – Supervision

---

Ms. Kutscher serves as the Founder, CEO and Chief Compliance Officer of Allovest. Ms. Kutscher can be reached at (714) 676-5540.

Allovest has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to Clients of Allovest. Further, Allovest is subject to regulatory oversight by various agencies. These agencies require registration by Allovest and its employees. As a registered entity, Allovest is subject to examinations by regulators, which may be announced or unannounced. Allovest 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.



## **Allovest Advisory Services, LLC**

### **Privacy Policy**

**Effective: February 9, 2015**

---

**Allovest Advisory Services, LLC**  
17111 Beach Blvd #203B \* Huntington Beach, CA 92647  
Phone: (714) 676-5540  
info@allovest.com

## Privacy Policy

### Our Commitment to You

Allovest Advisory Services, LLC ("Allovest" or the "Advisor") is committed to safeguarding the use of personal information of our Clients (also referred to as "you" and "your") that we obtain as your Investment Advisor, as described here in our Privacy Policy ("Policy").

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. Allovest (also referred to as "we", "our" and "us") protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

Allovest does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, 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 Policy.

### Why you need to know?

Registered Investment Advisors ("RIAs") must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

### What information do we collect from you?

Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number(s)	Income and expenses
E-mail address(es)	Investment activity
Account information (including other institutions)	Investment experience and goals

### What Information do we collect from other sources?

Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

### How do we protect your information?

To safeguard your personal information from unauthorized access and use we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client's personal information.

We require third parties that assist in providing our services to you to protect the personal information they receive from us.



## How do we share your information?

An RIA shares Client personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Do we share?	Can you limit?
<b>Servicing our Clients</b> We may share non-public personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting.	Yes	No
<b>Marketing Purposes</b> Allovest does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where Allovest or the client has a formal agreement with the financial institution. <b>We will only share information for purposes of servicing your accounts, not for marketing purposes.</b>	No	Not Shared
<b>Authorized Users</b> Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent(s) or representative(s).	Yes	Yes
<b>Information About Former Clients</b> Allovest 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.	No	Not Shared

## State-specific Regulations

California	In response to a California law, to be conservative, we assume accounts with California addresses do not want us to disclose personal information about you to non-affiliated third parties, except as permitted by California law. We also limit the sharing of personal information about you with our affiliates to ensure compliance with California privacy laws.
------------	--

## Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise this 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.

## Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (714) 676-5540 or via email at [info@allovest.com](mailto:info@allovest.com).

---

Allovest Advisory Services, LLC  
17111 Beach Blvd #203B \* Huntington Beach, CA 92647  
Phone: (714) 676-5540  
[info@allovest.com](mailto:info@allovest.com)