

FIRM BROCHURE
FORM ADV PART 2A

March 16, 2015

This Brochure provides information about the qualifications and business practices of SaveDaily.com, Inc., (“SaveDaily”, “we”, “our”, “us” or “firm”). If you have any questions about the contents of this Brochure, please contact us at 562.795.7500 or support@savedaily.com. The information in this Brochure has not been approved or verified by the United States Securities or Exchange Commission (“SEC”) or by any state securities authority but has been sent to securities departments in all 50 states.

SaveDaily.com, Inc., is a registered investment adviser. Registration of an investment adviser does not imply any level of skill or training.

Additional information about SaveDaily.com, Inc. and its business also is available on the SEC website at www.adviserinfo.sec.gov.

Item 2 – Material Changes

This Firm Brochure dated March 16, 2015, contains amendments and new information since the last filing of our ADV Part 2A Brochure on March 26, 2014.

The following is a summary of changes made throughout this document:

1. **Item 4 – Advisory Business:**

We have enhanced the description and disclosures of our advisory services and have included new services offerings. Changes were made to the following sections:

SAVYInvesting Model Portfolios
Wrap Fee Programs

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Item 4 Advisory Business

SaveDaily is an SEC registered investment adviser located in Costa Mesa, California incorporated in 1999. The company's largest shareholder is SaveDaily Partners LP which is controlled by Quail Bend Partners LLC, which is controlled by Steve Durbin.

SaveDaily provides self-directed, advice-driven investment services to the mass market, worldwide, that are otherwise made available only to the high net-worth investor. SaveDaily developed and owns a proprietary financial services platform which has been in use since 2008, helping financial Institutions succeed in bringing suitable and affordable investment services to everyday savers and investors.

SaveDaily provides the following services:

The SaveDaily.com "Private Labeled" Platform:

SaveDaily develops private label mutual fund trading platforms that allow banks, credit unions, third party administrators and broker-dealers (collectively "Financial Institutions") to reduce account management costs and deliver a financial services investment solution to their clients exclusively through the world wide web (or otherwise known as the "*internet*"). SaveDaily may offer various types of advisory services coupled with its SaveDaily.com technology platform. These services may include but are not limited to:

Impersonal Investment Advice:

SaveDaily's impersonal investment advice may include, but is not limited to, general personal finance articles, development of financial calculators, general asset allocation tools and model portfolios that are designed to meet self-directed investment objectives but do not purport to meet the individual objectives or needs of specific individuals.

Asset Allocation Models:

SaveDaily can assist Financial Institutions with the selection of specific mutual funds or ETFs Asset Allocation Models designed for specific investment objectives. These asset allocations models are made available to the Financial Institutions' clients through the SaveDaily.com platform. SaveDaily can also assist Financial Institutions with developing online screening to assist the Financial Institution's clients in selecting an appropriate asset allocation model or model portfolio. These online screening tools are based on a narrow set of general personal finance questions or client inputs. The screening tool is similar to what you might find on the internet through various public websites that attempt to help investors select mutual funds and ETF portfolios suited to investors' investment criteria, general investment goals and time frame. In all cases the client of the Financial Institution self-directs the investment choices through the SaveDaily.com platform. SaveDaily does not provide any personalized and or individual investment advice to any client on the SaveDaily.com platform.

The SaveDaily.com “Retail” Platform:

In addition to the services described above, SaveDaily also offers a “retail” version of the SaveDaily.com platform for individuals who contact SaveDaily directly or who may have been referred to us by other strategic partners and solicitors (see “*Item 14 – Client Referrals and Other Compensation*” below). SaveDaily offers the following services on its “retail” platform:

Impersonal Investment Advice:

SaveDaily’s impersonal self-directed investment advice may include, but is not limited to, general personal finance articles, financial calculators, general asset allocation tools and model portfolios that are designed to meet general investment objectives but do not purport to meet the individual objectives or needs of specific individuals.

Asset Allocation Models:

SaveDaily makes available to individuals third-party Asset Allocation Models that utilize mutual funds or ETF. These models are designed for general investment objectives and do not purport to meet the individual needs or investment objectives of specific individuals. The Asset Allocation determinations are based answers to a series of investor profile and personal finance related questions. Once a self-directed asset allocation has been selected by the Client, SaveDaily will maintain the asset allocation selected by the client. SaveDaily does not provide any personalized and or individual investment advice to any client on the SaveDaily.com platform.

SAVYInvesting Model Portfolios:

SaveDaily has discontinued its SAVYInvesting Model Portfolios as of December 31, 2014.

Participation in Wrap Fee Programs:

SaveDaily does not sponsor or directly participate in any Wrap Fee Programs.

Assets Under Management

SaveDaily managed totals assets as of December 31, 2014, is as follows:

	<u>U. S. Dollar Amount</u>	<u>Total No. of Accounts</u>
Discretionary:	\$2,032,397.20	360
Non-Discretionary:	\$334,073,337.26	52,141

Item 5 – Fees and Compensation

The SaveDaily.com “Private Labeled” Platform Fees:

Each “Private Label” Financial Institution negotiates and enters into an agreement with SaveDaily. The terms and conditions of each agreement are unique to the services provided to the financial institution and its end-user clients by SaveDaily. SaveDaily generally receives start-up fees for the development of a “Private Labeled” Platform. In addition, SaveDaily will receive either a monthly per account fee ranging from \$4.00 to \$15.00 per end-user account. Fees are charged monthly and deducted directly from the end-users account held with a qualified custodian.

The SaveDaily.com “Retail” Platform Fees:

Retail clients that establish an account directly with SaveDaily.com pay an annual fee of \$93.24 (\$7.77 monthly) for services offered on the SaveDaily.com Retail Platform. The fee is charged at the end of each calendar month and deducted directly from the clients account. Qualified accounts are charged an Account Setup Fee of \$75.00 and charged an annual administration fee of \$15.00, for custodial access and reporting.

GENERAL FEE INFORMATION

Termination of the Advisory Relationship:

A client agreement may be canceled at any time, by either party, for any reason upon receipt of 30 days written notice.

Additional Fees and Expenses:

In addition to the fees detailed above, Clients are also responsible for any fees and expenses charged by custodians and imposed by platform sponsors or broker-dealers, including, but not limited to, any transaction charges imposed by a platform sponsor or broker-dealer with which the platform sponsor effects transactions for the Client's account(s). Please refer to the "Brokerage Practices" section (Item 12) of this disclosure brochure for additional information.

Mutual Fund Fees:

All fees paid to SaveDaily for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds and/or ETFs to their shareholders. These fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee. If the fund also imposes sales charges, a client may pay an initial or deferred sales charge. A client could invest in a mutual fund directly, without our services. In that case, the client would not receive the services provided by our firm which are designed, among other things, to assist the client with determining which mutual fund or funds are most appropriate to satisfy each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the funds and our fees

to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

Wrap Fee Programs Fees:

SaveDaily does not currently sponsor any wrap fee programs but may choose to do so in the future. If the firm sponsors a program, it will adopt appropriate policies and procedures monitor this activity.

Advisory Fees in General:

Clients should note that similar advisory services may (or may not) be available from other registered (or unregistered) investment advisers for similar or lower fees.

Item 6 – Performance Based Fees and Side-by-Side Management

SaveDaily does not accept performance-related fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

Item 7 – Types of Clients

SaveDaily provides advisory services to the following types of client:

- Banks
- Credit Unions
- Third-Party Administrators
- Broker-Dealers
- Individuals
- Plan Sponsors
- Registered Investment Advisors

There are no minimum asset or income requirements to be a SaveDaily client. SaveDaily may provide advisory services to other financial advisory firms on a sub-contractual basis or on an as-needed basis.

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

SaveDaily assists clients with measuring their investment goals, risk tolerance and time horizon through an online electronic impersonal data gathering process in an effort to identify investment allocations or models that might be appropriate for the client's needs. In providing these self-evaluation tools, SaveDaily assists the client with meeting their stated goals, whether long-term or short-term. Using electronic rule sets, SaveDaily assists the client with evaluating their financial needs in an impersonal manner. The Advisor does not provide specific investment strategies.

The client's self-directed investment selections reflect the data provided by the client, and the selections may or may not result in diversification of the portfolio across several asset classes. Tax efficiency is an important consideration in developing allocations and models, but is not considered in these self-directed investment solutions.

Since risk reduction is a key element to long-term investment success, asset allocation principles are a key consideration in providing the client with a spectrum of investment alternatives. SaveDaily does not recommend specific individual securities or specific sectors within most asset classes. In general, we do not recommend individual company stocks or bonds or select funds focused on sectors such as Biotechnology, Utilities, Natural Resources, etc. SaveDaily's recommendations provide exposure to these sectors through mutual funds/ETFs that invest in a broad asset class. The major asset classes SaveDaily commonly recommends are U.S. Large Capitalization Stocks, U.S. Mid-Capitalization Stocks, U. S. Small Capitalization Stocks, Foreign Stocks, Alternative Asset Classes and Strategies, Short and Intermediate Fixed Income Securities, Cash and Cash Equivalents.

Excluding retirement plan investment options, we generally recommend no-load mutual funds or Exchange-Traded Funds ("ETFs") that represent either an index or managed portfolio of individual securities diversified within the target asset class. When recommending a specific fund, here are some of our considerations: pure no-load, low expense ratio, acceptable performance, style, tenure, market capitalization, turnover ratio, and inception.

Recommendations for or purchases of investments will be based on publicly available reports and analysis. In the case of mutual funds, recommendations will be based on reports and analysis of performance and managers, and certain computerized and other models for asset allocation.

SaveDaily also utilizes many sources of public information to include financial news and research materials. Investing in securities involves risk of loss that clients should be prepared to bear. SaveDaily in no way guarantees performance or results. SaveDaily encourages the strategy of regular portfolio rebalancing. Periodic rebalancing is a disciplined way to, buy and sell to maintain the portfolio risk profile. SaveDaily may encourage the review and evaluations of client portfolios at least once a year. In environments with high volatility, we may encourage more frequent rebalancing for clients.

Item 9 – Disciplinary Information

Registered investment advisors are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of SaveDaily or the integrity of SaveDaily's management. SaveDaily has no history of any disciplinary action.

Item 10 – Other Financial Industry Activities and Affiliations

Insurance Agency Affiliations

SaveDaily is affiliated with SaveDaily.com Insurance Solutions LLC dba SaveDaily Life Solutions. SaveDaily's management personnel may be also separately licensed as insurance agents with this company. SaveDaily Life Solutions and the individuals registered as insurance agents in their individual capacities may represent various insurance companies for insurance products. As such, SaveDaily Life Solutions and these individuals are able to receive separate, yet customary commission compensation resulting from implementing product transactions on behalf of advisory clients. Clients, however, are not under any obligation to engage these individuals when considering implementation of advisory recommendations. The implementation of any or all recommendations is solely at the discretion of the client.

Item 11 – Code of Ethics

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.

SaveDaily and our personnel owe a duty of loyalty, fairness and good faith towards our clients, and have an obligation to adhere not only to the specific provisions of the Code of Ethics but to the general principles that guide the Code.

SaveDaily's Code of Ethics further includes the firm's policy prohibiting the use of material non-public information. While we do not believe that we have any particular access to non-public information, all employees are reminded that such information may not be used in a personal or professional capacity.

A copy of our Code of Ethics is available to our advisory clients and prospective clients. You may request a copy by email sent to support@savedaily.com, or by calling us at 562.795.7500.

Item 12 – Brokerage Practices

SaveDaily leverages firms such as Fidelity, TD Ameritrade, Schwab, LPL Financial or similar broker-dealer firms in its electronic online offerings to clients. Firm selection is based on the characteristics of the electronic online offering and the partner acting as an administrator of such

offering. Quality and cost of services provided along with the impersonal assessment of client needs are factors in the selection process.

Brokers that we select to execute transactions may from time to time refer clients to our firm. SaveDaily will not make commitments to any broker or dealer to compensate that broker or dealer through brokerage or dealer transactions for client referrals; however, a potential conflict of interest may arise between the client's interest in obtaining best price and execution and SaveDaily interest in receiving future referrals.

SaveDaily may receive commission, soft dollars, client referrals and other benefits from recommending a particular broker-dealer. Clients should understand that different broker-dealers may be charged more money by not being in an aggregated account that allows for purchase of institutional shares.

SaveDaily conducts periodic soft-dollar reviews, analyzing price and commissions offered by the various brokers used and volume of client commissions directed to each broker. Moreover, we perform a qualitative ranking of all brokers used by interviewing and/or polling our trading staff.

[Impersonal Investment Advice](#)

SaveDaily focuses on providing financial planning services which may involve impersonal advice on income, cash flow management, retirement, financial independence, college funding, estate planning, investment portfolio issues, tax saving strategies, and risk management. These services are offered on an impersonal basis through electronic rule sets offered to our clients at our web interfaces. The impersonal advice given may include the recommendation of annual reviews/updates and it would be the client's responsibility to initiate additional services as may be needed. SaveDaily does not review client accounts for impersonal investment advice.

[Asset Allocation Models](#)

SaveDaily may review Asset Allocation Model accounts if specifically contracted for by a Financial Institution or by a client directly. SaveDaily will review Asset Allocation Models based on specific investment objectives and not on the individual needs of client accounts. These reviews are conducted quarterly. Individual clients who have selected Assets Allocation Models will generally receive standard accounts statement form SaveDaily on a quarterly and annual basis, in an electronic format.

Item 14 – Client Referrals and Other Compensation

[Other Third-Party Relationships](#)

SaveDaily has professional relationships with other third parties and may receive hard dollar compensation from those third parties. SaveDaily has made arrangements for clients to receive discounted services from some of these third parties. Being a client of SaveDaily may require the use of a particular custodian depending on the web offering being utilized by the client. Examples

of other third parties would include broker dealers, investment companies, mutual funds, banking institutions, insurance agencies, accounting firms, law firms, real estate brokers, pension consultants, and other investment advisors. Some of our clients may also work for one of these third parties.

Solicitor Relationships and Client Referrals

SaveDaily may enter into solicitor referral agreements with individuals, professional firms and financial institutions, banks and other financial institutions which may or may not be affiliated or associated with SaveDaily. SaveDaily may pay these individuals, professional firms, banks and financial institutions a flat fee or a percentage of the regular fee charged to the client for services rendered by SaveDaily. In no instance will this result in higher fees being charged to clients referred to SaveDaily.

Other Compensation

SaveDaily employees may attend conferences from time to time sponsored by solicitors, financial institutions, banks, product sponsors, insurance companies, broker-dealers, and/or custodians. The cost of such conferences are often paid for by these third parties and employees may receive incidental benefits such as meals and entertainment.

Item 15 - Custody

SaveDaily does not custody assets directly and uses third-party custodians to custody all client assets. SaveDaily primarily uses UMB Bank as a passive custodian to custody funds. Our firm does not have actual or constructive custody of client accounts.

Item 16 – Investment Discretion

SaveDaily offers discretionary allocations and models to clients through its web interfaces. Clients grant SaveDaily authority to manage the underlying securities on behalf of clients. SaveDaily's authority is to allow changes in the general models to replace specific funds or change the allocation percentages so the models better match the clients stated risk profile.

Item 17 – Voting Client Securities

SaveDaily may retain the authority to, and as a result will, vote proxies on behalf of impersonal advisory clients. Clients relinquish the right of receiving and voting proxies for any and all securities maintained in allocations and model offered to clients.

When SaveDaily has discretion to vote proxies on behalf of clients, we will vote those proxies in what it determines to be the best interests of our clients and in accordance with our established policies and procedures. Our firm will retain all proxy voting books and records for the requisite period of time, including a copy of each proxy statement received, a record of each vote cast, a copy of any document created by us that was material to making a decision how to vote proxies, and a copy of each written client request for information on how the adviser voted proxies. If our firm has a conflict of interest in voting a particular action, we will notify the client of the conflict and retain an independent third-party to cast a vote.

Clients may obtain a copy of our complete proxy voting policies and procedures by contacting SAVEDAILY directly at 562.795.7500 or support@savedaily.com. Clients may request, in writing, information on how proxies for his/her shares were voted. If any client requests a copy of our complete proxy policies and procedures or how we voted proxies for his/her account(s), we will promptly provide such information to the client.

Item 18 – Financial Information

SaveDaily has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding. Under no circumstances do we require or solicit payment of fees in excess of \$1,200 per client more than six months in advance of services rendered. Therefore, we are not required to include a financial statement.