

Part 2A of Form ADV: Firm Brochure

Item 1 Cover Page



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March 2019

This brochure provides information about the qualifications and business practices of Fiduciary Experts LLC. If you have any questions about the contents of this brochure, please contact us at 888-544-401k or 714-409-8869. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Additional information about Fiduciary Experts LLC is also available on the SEC's website at www.adviserinfo.sec.gov. Registration does not imply a certain level of skill or training.

Item 2 Material Changes

Fiduciary Experts has made the following material changes since filing its annual amendment in January 2018:

- Item 4, 5 and 13 – we disclosed that we offer financial planning services as an advisory service.
- Item 10 – we disclosed that investment adviser representatives of the firm may sell insurance products in their separate capacity as an insurance agent.



Form ADV Part 2A
Brochure 3/25/2019
IARD/CRD 146721

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Item 4 Advisory Business

A. Fiduciary Experts LLC was formed in February 2008 by Maribel Larios. Maribel has over eighteen years of investment advisory experience and has been in the 401k, 403b, 457 retirement plan business for over twenty years. She is the principal of this RIA.

B. As a Registered Investment Advisor we specialize in the retirement industry as consultants, fiduciaries, and investment managers for company and government retirement plans.

As a RIA our service model provides corporate, non-profits, and municipal retirement plans an independent fiduciary best practice process. We provide co-fiduciary and discretionary fiduciary services for the investment liability of these retirement plan by implementing best practices with a set process, specific evaluation criteria, benchmarking costs, and quarterly investment monitoring. Our services include the following but are not limited as we also take on special cases as it pertains to fiduciary services:

- 1- Formalize 401k oversight and process
- 2- Create/update Charter for proper delegation of plan management
- 3- Educate and identify current company fiduciaries and set up Investment Committee.
- 4- Create/Update IPS (Investment Policy Statement) with qualitative and quantitative criteria for proper investment selection.
- 5- Provide cost analysis and benchmarking on 401k, 457, 401a, 403b, RHS vendors
- 6- Renegotiate and recover excesses discovered to confirm such plan costs are reasonable.
- 7- Education and enrollment for plan participants.
- 8- One-on-one advisory service to participants
- 9- RFP and plan transition consulting and execution
- 10- Fiduciary overview and education to plan sponsors.

We work with the plan administrators, TPA firms, and brokers in order to orchestrate a transparent system which ultimately helps lower client liability and execute best practices as ERISA mandates.

We specialize on cost recovery solutions to the 401k, 403b, 457, and Profit-Sharing Retirement Plans. As an ERISA co-fiduciary or 3(38) advisor we address and provide solutions to the issues affecting the financial markets such as the liabilities fiduciaries handle, and we provide effective and transparent cost controls.

C. We tailor our service model to 401k, 457, and 403b plans as well as individuals. Individual clients may impose restrictions on investing in certain securities if they wish and such restrictions will be incorporated into their specific IPS. Institutional clients may also impose such restrictions so as long as these do not create a conflict in offering the necessary asset classes to participants to avoid any breaches of fiduciary duties.

Item 4 Advisory Business

Financial Planning Services

Fiduciary Experts offers financial planning services, which involve preparing a written financial plan covering only those specific areas of concern mutually agreed upon by you and us. When providing financial planning services, the role of your investment adviser representative is to find ways to help you understand your overall financial situation and help you set financial objectives. A modular written financial plan is limited or segmented and does not involve the creation of a full written financial plan. You should be aware that there are important issues that may not be taken into consideration when your investment adviser representative develops his or her analysis and recommendations under a modular written financial plan. Written financial plans prepared by us do not include specific recommendations of individual securities.

Our financial planning services do not involve implementing any transaction on your behalf or the active and ongoing monitoring or management of your investments or accounts. You have the sole responsibility for determining whether to implement our financial planning recommendations. To the extent that you would like to implement any of our investment recommendations through Fiduciary Experts or retain Fiduciary Experts to actively monitor and manage your investments, you must execute a separate written agreement with us for our asset management services.

D. We do NOT participate in any wrap programs.

E. As of December 2018, we manage over \$392,090,614.71 in assets as retirement plan consultants. About 10% of assets are managed under our discretionary model. 95% is managed on a non-discretionary basis as co-fiduciaries of such plans.

In order to avoid conflicts of interest and full transparency, we do not act as custodian for plans for assets under management. These assets are calculated by amounts in our client retirement plans held by plan administrators/recordkeepers and custodians.

Item 5 Fees and Compensation

All fees are negotiable. Below is a general fee schedule as all services are customized in order to meet our client's needs.

FIDUCIARY EXPERTS LLC Adviser Disclosures

The following important disclosures follow:

- Acceptance of Fiduciary Responsibility
- Adviser Affiliations
- 408 (b)(2) Fee Disclosures

Acceptance of Fiduciary Responsibility

Fiduciary Experts LLC, understands and agree to act as a fiduciary and accept the personal responsibility for the advice we provide our clients. As a fiduciary, we will act in the best interest of these clients.

The advice we provide as a fiduciary will be based on my best judgment of what a prudent person would do under the same circumstances. As a fiduciary we are not responsible for the financial results that are achieved or not achieved, provided that we can document the prudent process used to arrive at advice we provide.

As a fiduciary, our advice will be consistent with the principles of diversification so as to minimize the risk of large losses, unless under the circumstances it is shown to be imprudent to diversify.

The advice we provide as a fiduciary will be in accordance with any documents or other instruments governing the client and consistent with existing laws and regulations.

Fee Schedules

B. Describe whether you deduct fees from clients' assets or bill clients for fees incurred. If clients may select either method, disclose this fact. Explain how often you bill clients or deduct your fees.

Investment Management for Individual Accounts (not institutional clients):

Tier 1	90 bp on first	1,000,000 \$
Tier 2	40 bp on next	9,000,000 \$
Tier 3	30 bp on next	15,000,000 \$
Tier 4	25 bp on next	15,000,000 \$
Tier 5	20 bp on next	75,000,000 \$
Tier 6	15 bp on all additional funds	

Institutional Clients:

Single Annual Flat Fee for Services Selected as a co-fiduciary with *no* discretion over assets: Institutional - Full Service (Service List Identified below fee schedule)

a. Retirement Plan Assets Below \$1MM -	Fee Ranges between	\$ 3,000 - \$ 5,000	per year
b. Retirement Plan Assets between \$1MM-\$2MM -	Fee Ranges between	\$ 5,000 - \$ 8,000	per year
c. Retirement Plan Assets between \$2MM-\$5MM -	Fee Ranges between	\$ 8,000 - \$15,000	per year
d. Retirement Plan Assets between \$5MM-\$8MM -	Fee Ranges between	\$12,000 - \$18,000	per year
e. Retirement Plan Assets between \$8MM-\$12MM -	Fee Ranges between	\$16,000 - \$20,000	per year
f. Retirement Plan Assets between \$12MM-\$16MM -	Fee Ranges between	\$18,000 - \$22,000	per year
g. Retirement Plan Assets between \$16MM-\$20MM -	Fee Ranges between	\$20,000 - \$25,000	per year
h. Retirement Plan Assets greater than \$20MM -	Fee ranges between	\$20,000 - \$30,000	per year

2) Source: Deducted on a pro-rata basis from investor accounts or directly by Plan Sponsor or a combination of the two. Payer can be a combination of participant accounts on a pro-rata basis and Plan Sponsor directly. Such Fees are Received from record keeper, or Plan Sponsor typically on a quarterly basis and billed in arrears.

Fiduciary Status - Retirement Plan 3(21) Fiduciary or 3(38) Fiduciary: Fee increases for discretionary fiduciary services on asset management.

Services Provided and Customized for an Annual Flat Fee

Review plan's success in meeting participant's needs and retirement goals and make recommendations for changes.

- 1.00 Investment Analysis
 - 1.01 Define the client's investment-related goals and objectives
 - 1.02 Prepare and maintain the client's Investment Policy Statement ("IPS")
 - 1.03 Identify asset classes appropriate for client's portfolios
 - 1.04 Search for investment managers for investment options
 - 1.05 Conduct due diligence for investment options
 - 1.06 Choose investments and create portfolios according to the terms of the IPS
 - 1.07 Develop and maintain model portfolios
 - 1.08 Control and account for investment expenses
 - 1.09 Monitor investment options and prepare periodic investment reports
 - 1.10 Design rules for assigning participants to QDIAs
 - 1.11 Construct QDIA investment alternatives
 - 1.12 Place participants in appropriate investments
 - 1.13 Assist participants in selecting investments

Quarterly report investment decisions made to plan sponsor and Named Fiduciary

- 2.00 Plan Support Services
 - 2.01 Conduct a fiduciary assessment
 - 2.02 Oversee plan administration activities
 - 2.03 Support DOL and IRS audits
 - 2.04 Select, hire and monitor certain service providers
- 3.00 Recordkeeper Selection and Monitoring

- 3.01 Collect data about the plan to develop a Request For Proposal that is used in a recordkeeping provider search
- 3.02 Conduct search for recordkeeping provider
- 3.03 Evaluate the capabilities of recordkeeping providers, based on industry norms and *Request For Proposal*
- 3.04 Interview finalists in the provider search and select recordkeeper
- 3.05 Evaluate the recordkeeper on a regular basis to measure compliance with plan documents and standards and assist with necessary corrective action
- 4.00 Trustee/Custodian Selection and Monitoring
- 4.01 Collect data about the plan to develop a Request For Proposal that is used in a trustee/custodian search
- 4.02 Conduct search for trustee/custodian
- 4.03 Evaluate the capabilities of trustee/custodians, based on industry norms and Request For Proposal
- 4.04 Interview finalists in the trustee/custodian search and select trustee/custodian
- 4.05 Evaluate the trustee/custodian on a regular basis to measure compliance with plan documents and standards and assist with necessary corrective action
- 4.06 Evaluate and measure the trustee/custodians' proxy voting procedure
- 5.00 Participant Services
- 5.01 Evaluate and determine the educational needs of the plan sponsors and plan participants, and establish educational objectives
- 5.02 Formulate a plan and system to measure progress in achieving educational objectives
- 5.03 Develop participant educational materials, enrollment materials and enrollment meetings
- 5.04 Conduct investment education and enrollment and other education meetings
- 5.05 Monitor the participant demographics for asset allocation to identify additional needs for specific groups of participants
- 5.06 Evaluate the quality of services provided to participants to ensure that industry norms are achieved
- 5.07 Perform one-on-one educational and individual sessions per participant request.
- 5.08 Perform Webinars and conference calls with participants ad hoc and on demand
- 6.00 Plan Conversion
- 6.01 Assist in the process of converting the plan to the newly selected providers and act as the liaison between former and newly appointed provider
- 6.02 Review, advise and assist with the negotiation of the service and/or trust agreement with the new provider
- 7.00 Other Services-Projects and Special ad hoc requests
- 7.01 Provide Client Portal for safe keeping of documents and fiduciary process

Financial Planning Fees

Fees charged for our financial planning services are negotiable based upon the type of client, the services requested, the investment adviser representative providing advice, the complexity of the client's situation, the composition of the client's account, other advisory services provided and the relationship of the client and the investment adviser representative. The following are the fee arrangements available for financial planning services offered by Fiduciary Experts.

Fiduciary Experts provides financial planning services under a fixed fee arrangement. A mutually agreed upon fixed fee is charged for financial planning services under this arrangement. There is a range in the amount of the fixed fee charged by Fiduciary Experts for financial planning services. The minimum fixed fee is generally \$100, and the maximum fixed fee is generally no more than \$5,000. The amount of the fixed fee for your engagement is specified in your financial planning agreement with Fiduciary Experts. Financial planning fees for family members may be waived. At our sole discretion, you may be required to pay in advance of the fixed fee at the time you execute an agreement with Fiduciary Experts; however, at no time will Fiduciary Experts require payment of more than \$1,200 in fees more than six months in advance. Upon completion and delivery of the financial plan, the fixed fee is considered earned by Fiduciary Experts and any unpaid amount is immediately due.

If Client is currently receiving asset management services from Fiduciary Experts for an asset management fee, Fiduciary Experts waives any fees for services under this Agreement. Although Fiduciary Experts is not charging investment advisory fees under this Agreement, there are fees and expenses charged by mutual funds to their shareholders if client invests in mutual funds due in part to the services under this Agreement. These fees and expenses are described in each mutual fund's prospectus. These fees will generally include a management fee, other fund expenses and a possible distribution fee (known as 12(b)-1 fees). If the mutual fund also imposes sales charges, Client may pay an initial or deferred sales charge.

Likewise, although Fiduciary Experts is not charging investment advisory fees under this Agreement, if client decides to invest through a qualified custodian due in part to the services under this Agreement, the qualified custodian or broker-dealer executing certain transaction will charge commissions for implementing transactions.

To the extent Fiduciary Experts provides you with general investment recommendations as part of the financial planning services and you implement such investment recommendations through Fiduciary Experts, we may offer in our agreement with you to waive or reduce the fees for financial planning services.

The financial planning services terminate upon delivery of the written financial plan or upon either party providing the other party with written notice of termination.

In the event that you terminate the financial planning services at any time prior to presentment of the written plan by providing notice to Fiduciary Experts, there will be no penalty or fees due. In the event that there is a remaining balance of any fees paid in advance after the deduction of fees from the final invoice, those remaining proceeds will be refunded by Fiduciary Experts to you. If you are not satisfied with the financial plan prepared by Fiduciary Experts, we may waive our fee; however, in such a situation, Fiduciary Experts retains intellectual property rights over any written financial plan prepared by Fiduciary Experts, and the written financial plan must be returned to us.

Other Fee Terms for Financial Planning Services

You may pay the investment advisory fees owed for the financial planning services by submitting payment directly (for example, by check) or credit card. If you elect to pay by credit card, you will provide written authorization to Fiduciary Experts for such a charge. You should notify Fiduciary Experts within ten (10) days of receipt of an invoice if you have questions about or dispute any billing entry.

All fees paid to Fiduciary Experts for services are separate and distinct from the commissions, fees and expenses charged by insurance companies associated with any life insurance or fixed insurance products subsequently acquired by you. If you sell or liquidate certain existing securities positions to acquire any insurance, you may also pay a commission and/or deferred sales charges in addition to the financial planning fees paid to Fiduciary Experts and any commissions, fees and expenses charged by the insurance company for subsequently acquired insurance and/or annuities.

If you elect to have your investment adviser representative, in his or her separate capacity as an insurance agent, implement the recommendations of Fiduciary Experts, your investment adviser representative at his or her discretion may waive or reduce the investment advisory fee charged for these services by the amount of the commissions received by your investment adviser representative as an insurance agent. Any reduction of the investment advisory fee will not exceed 100% of the insurance commission received.

All fees paid to Fiduciary Experts for advisory services are separate and distinct from the fees and expenses charged by mutual funds to their shareholders. These fees and expenses are described in each mutual 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, you may pay an initial or deferred sales charge.

All fees paid to Fiduciary Experts for financial planning services are separate and distinct from the commissions charged by a broker-dealer or asset management fees charged by an investment adviser to implement such recommendations.

If you elect to implement the recommendations of Fiduciary Experts through our other investment advisory programs, Fiduciary Experts may waive or reduce a portion of the investment advisory fees for such investment advisory program(s). Any reduction will be at the discretion of your investment adviser representative and disclosed to you prior to contracting for additional investment advisory services.

It should be noted that lower fees for comparable services may be available from other sources.

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

We do not charge performance-based fees.

Item 7 *Types of Clients*

- 1- Private and public companies
- 2- Government agencies
- 3- Municipalities
- 4- Hospitals and Churches
- 5- Schools and Educational Institutions
- 6- Foundations and Non-profit entities
- 7- Individuals and business owners

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

Fiduciary Experts provides the investment strategy and its implementation for all clients, utilizing a variety of securities such as stocks, bonds, Exchange Traded Funds (ETFs) or pooled investment vehicles (such as mutual funds). Analysis for institutional portfolios differs from that of individual investors due to ERISA compliance and proper asset allocation management of such portfolios.

Our clients receive the benefit of developed investment philosophies and strategies, research and due diligence, account monitoring, and personal financial planning recommendations. Expansive academic research, investment information, and certain proprietary analyses are drawn upon by Main Street Capital Advisors, FI360, and Fiduciary Benchmarks Inc. in order to provide innovative investment advisory services.

Each client receives a written Investment Policy Statement, which sets forth a recommended model allocation based on the clients' risk tolerance, age, and objectives. Specific no-load mutual funds and other investment products and securities are then recommended to clients. Clients' portfolios are periodically monitored, and changes to investment portfolios are suggested when appropriate. A disciplined approach to rebalancing is employed in order to maintain asset class exposures within desired risk tolerances, subject to variances permitted for tax reduction, tax planning or other reasons.

Methods of Analysis and Investment Strategies

Institutional Advice:

Upon the creation of the IPS we are able to apply a consistent model for monitoring and addressing issues associated with such assets. Specific criteria for benchmarking is based on factors selected within the IPS in order to apply a consistent method for evaluating such assets and taking the proper steps to advise on changes or updates.

Individual Advice:

We rely on specific information pertaining to the clients' financial situation, estate planning, tax planning, risk management planning, short-term and long-term lifetime financial goals and objectives, investment time horizon, and perceived current tolerance for risk. This information becomes the basis for the model Investment Policy Statement which we best meet the clients' stated long term personal financial goals. The model Investment Policy Statement provides for investments in those asset classes which is designed to allocate combinations of return, risk, and correlation over the long term. A tremendous amount of academic research reveals that strategic asset allocation is determinative of the majority of the expected long-term gross returns of investor's portfolios.

Part of our selection of asset classes is driven by research into global asset. The investment advice which we Provide is based upon long-term investment strategies which incorporate the principles of Modern Portfolio Theory. The utilization of several different asset classes as part of an investor's portfolio is emphasized: Equity, Fixed Income, and Cash equivalents.

Our investment approach is firmly rooted in the belief that markets are fairly efficient and that investors' gross returns are determined principally by asset allocation decisions. A focus is provided on developing and implementing globally diversified portfolios, principally through the use of low-cost and tax-efficient passively managed stock mutual funds, many of which are available only to institutional investors and clients of advisors granted access to such funds. Investment policy and overall portfolio weightings as between equities and fixed income investments are based upon each client's needs and desires, perceived risk tolerance, the need to assume various risks, and investment time horizon. We may use tactical asset allocation strategies in connection with the management of client portfolios by overweighting or underweighting a particular asset class.

Methods of Analysis; Sources of Information

Our security analysis is based upon a number of factors including those derived from commercially available software technology, securities rating services, general economic and market and financial information, due diligence reviews, and specific investment analyses that clients may request. The main sources of information include commercially available investment information and evaluation services, financial newspapers and journals, academic white papers and periodicals. Prospectuses, statements of additional information, other issuer-prepared information, and data aggregation services (Morningstar Advisor) are also utilized. Our advisors also attend various investment and financial planning conferences. Research is also received from consultants, including Main Street Capital Advisors, FI360, and Riskalyze.

Types of Investments

- Mutual Funds
- ETFs
- Variable Annuities
- Fixed Annuities
- Bonds
- CD's
- Money Markets and Stable Value

Recommendations may be undertaken to advise clients to invest in low-cost, no-load (no commission), variable, or fixed deferred or immediate annuities when appropriate to the circumstances and tax situation of the client.

Risk of Loss

Investing in securities involves a risk of loss that clients should be prepared to bear. The investment recommendations seek to limit risk through broad global diversification in equities (through broadly diversified stock mutual funds), and investment in fixed income securities or diversified bond funds.

However, the investment methodology will still subject the client to declines in the value of their portfolios, which can at times be dramatic. Fiduciary Experts believes a high probability exists in most market environments of a long-term (15-year or greater) outperformance of small cap and value stocks, relative to large cap and growth stocks, and hence the stock (equities) portion of an investor's portfolio may be "tilted" toward small cap and value stocks. Accordingly, the normally greater expected returns of the equity portion of the portfolio will in turn often permit the overall allocation to equities (stocks, stock mutual funds) to be reduced, and the allocation to fixed income investments increased. Fiduciary Experts believes this is the best manner to temper the shorter-term volatility of the stock market, especially for clients who derive cash flow from their portfolios, such as clients who are in retirement years.

While we seek to reduce non-compensated risks to which a client may be exposed, other risks (including but not limited to the risk of a general stock market decline) may be assumed in order to seek to attain the clients' longer-term financial goals and objectives. However, we cannot provide any guarantee that the clients' goals and objectives will be achieved.

Types of Risk

Fiduciary Experts seeks to educate clients of various risks and select only those risks that they can tolerate in exchange for potential return. Investors face the following investment risks:

☐ **Interest-Rate Risk:**

Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.

☐ **Market Risk:**

The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.

☐ **Inflation Risk:**

When inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.

☐ **Currency Risk:**

Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.

☐ **Reinvestment Risk:**

This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.

☐ **Business Risk:**

These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.

☐ **Liquidity Risk:**

Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.

☐ **Financial Risk:**

Excessive borrowing to finance a business' operations increases the risk of profitability,

because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

☐ Small Capitalization Stock Risk:

Small companies often have narrower markets and limited financial resources, so investments in these stocks present more risk than investments in those of larger, more established companies.

☐ Value Style Investing Risk:

Companies that are thought to be “under-valued” may never reach their full estimated market value and value style investing may fall out of favor and underperform growth or other style investing during given periods.

Item 9 Disciplinary Information

There is no disciplinary action in the past or pending for our firm and its employees.

Item 10 Other Financial Industry Activities and Affiliations

Fiduciary Experts is **not** and does **not** have a related person that is a broker/dealer, municipal securities dealer, government securities dealer or broker, an investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund," and offshore fund), another investment adviser or financial planner, a futures commission merchant, commodity pool operator, or commodity trading advisor, a banking or thrift institution, an accountant or accounting firm, a lawyer or law firm, an insurance company or agency, a pension consultant, a real estate broker or dealer, and a sponsor or syndicator of limited partnerships.

We are an independent registered investment registered adviser and only provide investment advisory services. We are not engaged in any other business activities and offer no other services except those described in this Disclosure Brochure. However, while we do not sell products or services other than investment advice, our representatives may sell other products or provide services outside of their role as investment adviser representatives with us.

Insurance Agent

You may work with your investment adviser representative in his or her separate capacity as an insurance agent. When acting in his or her separate capacity as an insurance agent, the investment adviser representative may sell, for commissions, life insurance, fixed or indexed annuities and other insurance products to you. As such, your investment adviser representative in his or her separate capacity as an insurance agent, may suggest that you implement recommendations of Fiduciary Experts by purchasing these insurance products. This receipt of commissions creates an incentive for the representative to recommend those products for which your investment adviser representative will receive a commission in his or her separate capacity as an insurance agent. Consequently, the advice rendered to you could be biased. You are under no obligation to implement any insurance transactions through your investment adviser representative.

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

Code of Ethics

Fiduciary Experts has adopted a Code of Ethics, to which all employees are bound to adhere.

The key component of our Code of Ethics states:

Fiduciary Experts LLC and its investment advisor representatives and employees shall always:

- ☐ Act in the best interests of each and every client; and put our fiduciary duty and role in writing.
- ☐ Act with integrity and dignity when dealing with clients, prospects, team members, and others;
- ☐ Strive to maintain and continually enhance our high degree of professional education regarding Fiduciary, ERISA, investments, tax, estate, and risk management planning;
- ☐ Seek at all times to preserve our firm's independence and to maintain our complete objectivity with respect to our advisory services and each recommendation made to our clients.

Fiduciary Experts further adopted a detailed Code of Ethics expressing the firm's commitment to ethical conduct, which is adopted by reference and which is utilized to guide the personal conduct of our various team members. This detailed Code of Ethics describes the firm's fiduciary duties and responsibilities to clients and sets forth our practices of supervising the personal securities transactions of employees with prior or concurrent access to client trade information. Fiduciary Experts will provide a complete copy of the Code of Ethics to any client or prospective client upon request.

Item 12: Brokerage Practices

We are not affiliated with a broker/dealer other than a custodial relationship to enhance transparency and avoid any conflicts of interest.

Selected Brokerage Firms (Custodians)

Fiduciary Experts utilizes the services of TD Ameritrade Institutional, and TD Ameritrade Trust to provide our team members with access to institutional trading and custody services, which are not typically available to retail investors.

These services generally are available to independent investment advisors on an unsolicited basis and at no charge to them. However, not all independent investment advisors recommend their clients to utilize particular custodians.

Item 13: Review of Accounts

For Institutional Clients:

Fiduciary Experts conducts quarterly portfolio reviews for each client and provides a face to face presentation of such reports to its institutional 401k, 403b and 457 Plans. When addressing participant accounts individually we provide ad hoc reports and analysis as needed or as requested by the employee him/her self. We provide a website and helpdesk exclusively to address such concerns as well as common service plan requests by setting up meetings face to face with the employees or via web or phone conference call.

For individual portfolios:

Periodic Portfolio Reviews are undertaken by advisors of Fiduciary Experts to ascertain if the values in any asset class have strayed beyond their target minimums or maximums, and for purposes of meeting clients' cash flow needs.

Even if one or more asset classes fall outside their target minimums or maximums, the advisor may determine not to rebalance the asset class for various reasons, such as avoidance of short term capital gains, deferring long-term capital gains realization, minimization of transaction costs, or our view on whether the asset class is undervalued or overvalued relative to historic norms and our view of the level of the macroeconomic risks to which the asset class may be exposed. Such in-house portfolio reviews are subject to additional restrictions set forth below.

Additional Portfolio Reviews are undertaken upon request by the client, such as when special cash needs arise or when additional cash or securities are added to the investment portfolio. We will respond to such requests within a reasonable period of time.

Other conditions that may trigger a review are changes in the tax laws, new investment information, and changes in a client's own situation. Portland Financial Advisors may also undertake sales and purchases during this time to effect tax loss harvesting, in addition to rebalancing actions.

Account reviewer is Maribel Larios, MBA and CFA Level I Candidate, who considers the clients' current security positions and the likelihood that the performance of each security will contribute to the investment objectives of the client.

In undertaking rebalancing actions, Fiduciary Experts will seek to rebalance one or more asset classes closer to the targets. We may decline to rebalance a specific asset class, due to tax concerns, high transaction costs relative to the trade amount, or other reasons.

Fiduciary Experts may estimate the market close at any point during the day during which trades are being made and undertake trades on that basis. Since the stock market is very volatile, especially in the last hour of trading, this may cause us to underestimate or overestimate the amount needed to affect a rebalancing action.

Financial planning clients do not receive any report other than the written plan originally contracted for and provided by Fiduciary Experts.

Item 14: Client Referrals and Other Compensation

Fiduciary Experts LLC does not provide or accept compensation from any person for client referrals.

Referrals to other professionals may be undertaken where appropriate to meet the clients' needs. These situations include:

☐ Referral to other professionals such as CPAs, ERISA attorneys, Estate Planning Attorneys, Tax professionals, and other professions as it relates to helping our clients meet their needs. No referral fees are paid to Fiduciary Experts LLC for referring clients to other professionals.

Item 15: Custody

It is our policy to not accept custody of clients' securities. In other words, Fiduciary Experts LLC is not granted access to our clients' accounts, which would enable us to withdraw or transfer or otherwise move funds or cash from any client account to our accounts or the account of any third party (other than for purposes of fee deductions, as explained below). This is for the safety of our clients' assets.

However, with client consent, we may be provided with the authority to seek deduction of advisors' fees from clients' accounts; this process generally is more efficient for both the client and the investment advisor, and there may be tax benefits for the client to this method when fees can be paid from certain tax-deferred accounts of clients.

All of our clients receive account statements directly from qualified custodians or record-keepers, that maintain those assets. Clients should carefully review these account statements and compare them to the quarterly or other reports. We urge all of our clients to review statements from the custodians in order to ensure that all account transactions, including deductions to pay advisory fees remain proper, and to contact us with any questions.

Item 16: Investment Discretion

Fiduciary Experts accepts limited forms of discretion over clients' accounts, as follows, with the consent of the client. Each client's grant of discretion is evidenced in the client services agreement (or addendums thereto) signed by the client and is further evidenced to the custodians through a limited power of attorney contained in the account establishment form signed by the client or a separate limited power of attorney document signed by the client.

Some clients appoint Fiduciary Experts as the clients' agent and attorney-in-fact with respect to undertaking trades in client accounts; ability to enter trades electronically for clients often provides reduced transaction fees and other benefits to our client.

Please note that Fiduciary Experts prefers to contact clients in advance of trades or transactions outside of discretionary accounts prior to such activity, but the limited. Moreover, Fiduciary Experts LLC seeks to undertake a minimal amount of trading in client accounts, in order to keep transaction fees, other expenses, and tax consequences associated with trading to minimal levels.

Limited discretion to rebalance in accordance with investment policy – for some client accounts. With client consent, we will accept from clients' discretion to deploy cash additions (or cash arising from the redemption of maturity of securities) in clients' portfolio in accordance with the clients' investment policy statement.

In addition, Fiduciary Experts will accept from such clients the discretion to rebalance the clients' portfolio back closer to its desired targets. Clients typically grant such authority to us for rebalancing purposes when the clients' business affairs or travels are such that the client is likely to be unavailable to us to confer, prior to entering any recommended trade(s).

Fiduciary Experts has the ability to be a 3(38) fiduciary on retirement plans and as such creates and executes model portfolios for client plans as well as monitor and replace investment options as appropriate per the Investment Policy Statement.

Item 17 Voting *Client* Securities

As a matter of firm policy and practice, Fiduciary Experts LLC does not accept authority to vote proxies on behalf of clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. Generally, clients will receive their proxies or other solicitations directly from the custodian or transfer agent. However, clients may call or e-mail their advisor with questions regarding a particular proxy or other solicitation, and we may provide advice to clients regarding their voting of proxies or such solicitations, upon request of a client or clients or in unusual circumstances.

Item 18 Financial Information

Fiduciary Experts LLC is not subject to any financial reporting requirements and has never filed for bankruptcy.

