

## **Firm Brochure**

(Part 2A of Form ADV)

### **AMERICAN NORTHWEST ADVISORY SERVICES, L.L.C.**

#### **Pension Consulting**

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This brochure provides information about the qualifications and business practices of AMERICAN NORTHWEST ADVISORY SERVICES, L.L.C. If you have any questions about the contents of this brochure, please contact us at: 253-815-6564, or by email at: [INFO@AMERICANNW.COM](mailto:INFO@AMERICANNW.COM). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission, or by any state securities authority.

Additional information about AMERICAN NORTHWEST ADVISORY SERVICES, L.L.C. is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

03/10/2024

## Material Changes

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Annual Update: 03/10/2024

The Material Changes section of this brochure will be updated 03/10/2024 annually when material changes occur since the previous release of the Firm Brochure.

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Material Changes since the Last Update:

No material change has occurred since the last update.

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Full Brochure Available

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at: 253-815-6564 or by email at: [INFO@AMERICANNW.COM](mailto:INFO@AMERICANNW.COM).

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## Advisory Business

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### Firm Description

AMERICAN NORTHWEST ADVISORY SERVICES, L.L.C. began operations in 1996.

AMERICAN NORTHWEST ADVISORY SERVICES, L.L.C. provides personalized confidential investment management to individuals, pension and profit sharing plans, trusts, estates, charitable organizations and small businesses.

AMERICAN NORTHWEST ADVISORY SERVICES, L.L.C. is strictly a fee-only investment management firm.

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### Principal Owners

Thomas L. Oakes is the principal owner of AMERICAN NORTHWEST ADVISORY SERVICES, L.L.C.

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### Types of Advisory Services

AMERICAN NORTHWEST ADVISORY SERVICES, L.L.C. provides investment supervisory services, also known as asset management services.

- **AMERICAN NORTHWEST ADVISORY SERVICES, L.L.C.** will assist **Client** in the development of a written Investment Policy, which will be the result of the consultation with the **Client** to assist in the creation of both investment objectives and investment policies for the retirement plan.
- **AMERICAN NORTHWEST ADVISORY SERVICES, L.L.C.** will review annually with the **Client** the Investment Policy and recommend necessary changes and provide an updated Investment Policy document.
- Based on the written Investment Policy, **AMERICAN NORTHWEST ADVISORY SERVICES, L.L.C.** will provide **Client** an evaluation of appropriate investment managers that satisfy the established criteria. **AMERICAN NORTHWEST ADVISORY SERVICES, L.L.C.** will provide recommendations of specific investment managers. **AMERICAN NORTHWEST ADVISORY SERVICES, L.L.C.** will not have responsibility for making investments or advising individual participants regarding specific investments.
- **AMERICAN NORTHWEST ADVISORY SERVICES, L.L.C.** will manage the Plan as required by ERISA under the applicable standard of care for a fiduciary, in the sole interest of the Plan Participants and Beneficiaries under the “Prudent Man” standard.

- **AMERICAN NORTHWEST ADVISORY SERVICES, L.L.C.** will monitor investment managers on a periodic basis.
- **AMERICAN NORTHWEST ADVISORY SERVICES, L.L.C.** will monitor the selected investment managers and make annual recommendations for any changes that **AMERICAN NORTHWEST ADVISORY SERVICES, L.L.C.** may deem appropriate. Recommendations will include suggestions for the replacement of existing investment managers and includes suggested replacement investment managers for consideration by **Client**.
- **AMERICAN NORTHWEST ADVISORY SERVICES, L.L.C.** will provide at least three Investment Allocation Strategies that will identify an investment allocation strategy for different target needs of **Client**.
- **AMERICAN NORTHWEST ADVISORY SERVICES, L.L.C.** will annually update, as **AMERICAN NORTHWEST ADVISORY SERVICES, L.L.C.** deems appropriate, the Investment Allocation Strategies recommendations.
- **AMERICAN NORTHWEST ADVISORY SERVICES, L.L.C.** will, if necessary, assist **Client** in the selection of a Custodian and/or Trustee.
- **AMERICAN NORTHWEST ADVISORY SERVICES, L.L.C.** will provide assistance and monitor the initial transfer and purchase of investments, providing instructions to Custodian/Trustee.
- **AMERICAN NORTHWEST ADVISORY SERVICES, L.L.C.** will provide assistance in the monitoring and ongoing purchase of investments and necessary distributions of plan assets coordinating between **Client** and Custodian/Trustee.
- **AMERICAN NORTHWEST ADVISORY SERVICES, L.L.C.** will provide an annual evaluation of investment managers' performance against the objectives, guidelines and criteria established in the Investment Policy. Evaluation of investment manager performance will be conducted after the annual update of the **Client** Investment Policy.
- **AMERICAN NORTHWEST ADVISORY SERVICES, L.L.C.** will meet annually with **Client** to review all investment manager performance and any changes that are being recommended by **AMERICAN NORTHWEST ADVISORY SERVICES, L.L.C.** regarding all Investment Policy and investment manager decisions.
- **AMERICAN NORTHWEST ADVISORY SERVICES, L.L.C.** will provide assistance in the design of communications materials for Retirement Plan Participants. This will include basic investment

information, information regarding Plan Investments Options, and Investment Allocation Strategies.

- **AMERICAN NORTHWEST ADVISORY SERVICES, L.L.C.** will assist **Client** in the communication of benefits of Retirement Plan and Investment Options. The communication process will include an initial Employee Meeting and additional annual meetings at business corporate headquarters.

On more than an occasional basis, AMERICAN NORTHWEST ADVISORY SERVICES, L.L.C. furnishes advice to clients on matters not involving securities, such as financial planning matters, taxation issues, and trust services that often include estate planning.

As of 12/05/2023, AMERICAN NORTHWEST ADVISORY SERVICES, L.L.C. manages or acted as the pension consultant for approximately \$520,100,000 in assets for approximately 190 clients. Approximately \$19,994,000 is managed on a discretionary basis, and \$4,836,000 is managed on a non-discretionary basis, and \$495,270,000 are assets for which AMERICAN NORTHWEST ADVISORY SERVICES, L.L.C. is the pension consultant.

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#### Types of Agreements

The following agreements define the typical client relationships.

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#### Retirement Plan Advisory Service Agreement

Clients choose to have AMERICAN NORTHWEST ADVISORY SERVICES, L.L.C. to select, monitor, and report on investment options that are made available in their participant direct defined contribution plan. In addition, in situations where all or a portion of plan assets are invested in a pooled account, AMERICAN NORTHWEST ADVISORY SERVICES, L.L.C. provides investment advisory services related to the management of these assets.

Most clients choose to have AMERICAN NORTHWEST ADVISORY SERVICES, L.L.C. manage their assets. Realistic and measurable goals are set and objectives to reach those goals are defined. As goals and objectives change over time, suggestions are made and implemented on an ongoing basis.

The scope of work and fee for an Advisory Service Agreement is provided to the client in writing prior to the start of the relationship. The annual Advisory Service Agreement fee is based on a percentage of the investable assets according to the following schedule:

<u>Plan Assets</u>	<u>Annual Fee of Plan Assets Under Management</u>
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Initial \$0 to \$3 Million	0.55% / 55 bps
Additional \$3 to \$10 Million	0.45% / 45 bps
Additional \$10 to \$20 Million	0.25% / 25 bps
Additional \$20 Million	0.20% / 20 bps

Current client relationships may exist where the fees are higher or lower than the fee schedule above and may be negotiable.

Although the Advisory Service Agreement is an ongoing agreement and constant adjustments are required, the length of service to the client is at the client's discretion. The client or the investment manager may terminate an Agreement by written notice to the other party. At termination, fees will be billed on a pro rata basis for the portion of the quarter completed. The portfolio value at the completion of the prior full billing quarter is used as the basis for the fee computation, adjusted for the number of days during the billing quarter prior to termination.

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#### Termination of Agreement

A client may terminate any of the aforementioned agreements at any time by notifying AMERICAN NORTHWEST ADVISORY SERVICES, L.L.C. in writing and paying the rate for the time spent on the investment advisory engagement. If the client made an advance payment, AMERICAN NORTHWEST ADVISORY SERVICES, L.L.C. will refund any unearned portion of the advance payment.

AMERICAN NORTHWEST ADVISORY SERVICES, L.L.C. may terminate any of the aforementioned agreements at any time by notifying the client in writing. If the client made an advance payment, AMERICAN NORTHWEST ADVISORY SERVICES, L.L.C. will refund any unearned portion of the advance payment.

## Fees and Compensation

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#### Description

AMERICAN NORTHWEST ADVISORY SERVICES, L.L.C. bases its fees on a percentage of assets under management.

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#### Fee Billing

Investment management fees are billed quarterly, in advance, meaning that invoicing is done at the beginning of the three-month billing period. Payment in full is expected upon invoice presentation. Fees are



deducted from a designated client account to facilitate billing. The client must consent in advance to direct debiting of their investment account.

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#### Expense Ratios

Mutual funds generally charge a management fee for their services as investment managers. The management fee is called an expense ratio. For example, an expense ratio of 0.50 means that the mutual fund company charges 0.5% for their services. These fees are in addition to the fees paid to AMERICAN NORTHWEST ADVISORY SERVICES, L.L.C.

Performance figures quoted by mutual fund companies in various publications are after their fees have been deducted.

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#### Past Due Accounts and Termination of Agreement

AMERICAN NORTHWEST ADVISORY SERVICES, L.L.C. reserves the right to stop work on any account that is more than thirty (30) days overdue.

## Performance-Based Fees

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AMERICAN NORTHWEST ADVISORY SERVICES, L.L.C. does not use a performance-based fee structure.

## Supervision

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AMERICAN NORTHWEST ADVISORY SERVICES, L.L.C. supervise the supervised person by review each clients recommended investment policy based on information the supervised person received from the client. No information is provided to client prior to this review to insure the client objective matches the investment policy recommendations. The person responsible for supervising the supervised individuals is Thomas L. Oakes, Managing Director/Principal and can be contacted at 253-815-6564

## Types of Clients

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#### Description

AMERICAN NORTHWEST ADVISORY SERVICES, L.L.C. generally provides investment advice to pension and profit sharing plans sponsored by employers.

# Methods of Analysis, Investment Strategies and Risk of Loss

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## Methods of Analysis

Based on an established Investment Policy, AMERICAN NORTHWEST ADVISORY SERVICES, L.L.C. takes responsibility to determine the type of investment necessary to allow a participant of any age to properly construct a well diversified portfolio that meets the needs typical for retirement related investment. In addition to selecting the appropriate investment types, AMERICAN NORTHWEST ADVISORY SERVICES, L.L.C. compares various investments against their peer group to select investment managers showing relative outperformance against their peers.

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## Investment Strategies

Provide diversified investment options that provide protection against diversifiable risk at a low cost.

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## Risk of Loss

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. 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 any type of 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.

## **Disciplinary Information**

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### **Legal and Disciplinary**

The firm and its employees have not been involved in legal or disciplinary events related to past or present investment clients.

## **Other Financial Industry Activities and Affiliations**

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### **Financial Industry Activities**

AMERICAN NORTHWEST ADVISORY SERVICES, L.L.C. is closely affiliated with American Northwest Retirement Plan Services, LLC, a third party administrator, which provides plan administration services to all of the Adviser's clients.

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

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### **Code of Ethics**

The employees of AMERICAN NORTHWEST ADVISORY SERVICES, L.L.C. have committed to a Code of Ethics that is available for review by clients and prospective clients upon request. The firm will provide a copy of the Code of Ethics to any client or prospective client upon

request. Rule 204A-1 of the Investment Advisers Act of 1940 requires AMERICAN NORTHWEST ADVISORY SERVICES L.L.C. to have a Code of Ethics. The AMERICAN NORTHWEST ADVISORY SERVICES L.L.C. Code of Ethics provides all “access persons” are required to report all personal securities transactions and holdings to the Investment Adviser who must review periodically by the Chief Compliance Officer.

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#### Participation or Interest in Client Transactions

AMERICAN NORTHWEST ADVISORY SERVICES, L.L.C. and its employees may buy or sell securities that are also held by clients. Employees may not trade their own securities ahead of client trades. Employees comply with the provisions of the AMERICAN NORTHWEST ADVISORY SERVICES, L.L.C. Compliance Manual.

## Brokerage Practices

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#### Selecting Brokerage Firms

AMERICAN NORTHWEST ADVISORY SERVICES, L.L.C. does not have any affiliation with product sales firms. Specific custodian recommendations are made to clients based on their need for such services. AMERICAN NORTHWEST ADVISORY SERVICES, L.L.C. recommends custodians based on the proven integrity and financial responsibility of the firm and the best execution of orders at reasonable commission rates.

AMERICAN NORTHWEST ADVISORY SERVICES, L.L.C. recommends discount brokerage firms and trust companies (qualified custodians), such as Schwab Institutional, Benefit Trust, and State Street Bank and Trust.

AMERICAN NORTHWEST ADVISORY SERVICES, L.L.C. does not receive fees or commissions from any of these arrangements.

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#### Best Execution

AMERICAN NORTHWEST ADVISORY SERVICES, L.L.C. reviews the execution of trades at each custodian each quarter. The review is documented in the AMERICAN NORTHWEST ADVISORY SERVICES, L.L.C. Compliance Manual. Trading fees charged by the custodians is also reviewed on a quarterly basis. AMERICAN NORTHWEST ADVISORY SERVICES, L.L.C. does not receive any portion of the trading fees.

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#### Soft Dollars

AMERICAN NORTHWEST ADVISORY SERVICES, L.L.C. receives no soft dollar compensation. Any research that is made available is consistent with other information that is available through the various

discount brokerages and benefits all accounts managed by AMERICAN NORTHWEST ADVISORY SERVICES, L.L.C.

## **Review of Accounts**

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### **Periodic Reviews**

Account reviews are performed on an ongoing basis by advisory staff and Thomas L. Oakes, Principal and Managing Director.

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### **Review Triggers**

Other conditions that may trigger a review are changes in the tax laws, new investment information, and changes in a client's own situation.

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### **Regular Reports**

Clients receive periodic communications on a quarterly basis.

## **Client Referrals and Other Compensation**

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### **Incoming Referrals**

AMERICAN NORTHWEST ADVISORY SERVICES, L.L.C. has been fortunate to receive many client referrals over the years. The referrals came from current clients, estate planning attorneys, accountants, employees, personal friends of employees and other similar sources. The firm does not compensate referring parties for these referrals.

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### **Referrals Out**

AMERICAN NORTHWEST ADVISORY SERVICES, L.L.C. does not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

## **Custody**

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### **Account Statements**

All assets are held at qualified custodians which mean the custodians provide account statements directly to clients at their address of record at least quarterly.

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### **Performance Reports**

Clients are urged to compare the account statements received directly from their custodians to the performance report statements provided by AMERICAN NORTHWEST ADVISORY SERVICES, L.L.C.

## Investment Discretion

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AMERICAN NORTHWEST ADVISORY SERVICES, L.L.C. does not determine the trading on the accounts of participant directed retirement plans. The individual retirement plan participant makes all decisions regarding their individual investment. AMERICAN NORTHWEST ADVISORY SERVICES, L.L.C. will have investment discretion for pooled investment accounts, which an Advisory Agreement has been entered into with client and an Investment Policy has been agreed to between the parties.

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### Limited Power of Attorney

A limited power of attorney is a trading authorization for accounts which AMERICAN NORTHWEST ADVISORY SERVICES, L.L.C. has discretionary authority to trade or is authorized to trade based on the specific request of the client. A client will execute a limited power of attorney so that we may execute the trades that have been approved.

## Voting Client Securities

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### Proxy Votes

If the security or property held in such accounts is accompanied by voting rights and it is a security recommended by AMERICAN NORTHWEST ADVISORY SERVICES, L.L.C., then AMERICAN NORTHWEST ADVISORY SERVICES, L.L.C. shall exercise such voting rights in the manner it deems appropriate. All voting rights of unsolicited or non-recommended securities shall be exercised by the Client.

AMERICAN NORTHWEST ADVISORY SERVICES, L.L.C. votes proxies consistent with its proxy voting policy. A copy of AMERICAN NORTHWEST ADVISORY SERVICES, L.L.C.'s proxy voting policy is available upon request.

## Financial Information

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### Financial Condition

A balance sheet is not required to be provided because AMERICAN NORTHWEST ADVISORY SERVICES, L.L.C. does not serve as a custodian for client funds or securities, and does not require prepayment of fees of more than \$1,200 per client six months or more in advance.