



FORT VANCOUVER
INVESTMENT MANAGEMENT, LLC

FORM ADV PART 2A BROCHURE

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This brochure provides information about the qualifications and business practices of Fort Vancouver Investment Management, LLC. If you have any questions about the contents of this brochure, please contact us at (360) 823-0477 or public@fortvancouverim.com. Fort Vancouver Investment Management, LLC is a registered investment advisory firm with the Securities and Exchange Commission. Registration of an investment adviser does not imply any level of skill or training. The information in this brochure has not been approved by the United States Securities and Exchange Commission (SEC) or by any state securities authority.

Additional information about Fort Vancouver Investment Management, LLC is also available on the SEC's website at www.adviserinfo.sec.gov. FVIM's IARD number is 157019.

March 26, 2024

ITEM 2 - MATERIAL CHANGES

This Brochure dated March 26, 2024 updates our previous Brochure dated June 30, 2023 and is prepared according to the SEC's requirements and rules. Material changes are as follows:

Item 4 – Andrea Silbernagel was added as an owner.

Copies of this brochure may be requested by contacting Fort Vancouver Investment Management, LLC at (360) 823-0477, or by email to public@fortvancouverim.com.

Additional information about Fort Vancouver Investment Management is also available via the SEC's website www.adviserinfo.sec.gov. The SEC's website also provides information about any persons affiliated with Fort Vancouver Investment Management who are registered, or are required to be registered, as investment adviser representatives of Fort Vancouver Investment Management.

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ITEM 4 – ADVISORY BUSINESS

Fort Vancouver Investment Management, LLC (“FVIM” or “we”) is a fee-only investment advisory firm based in Vancouver, Washington. FVIM was founded in 2010 by Robert Pool. We specialize in investment management.

As a fee-only advisory practice, we receive compensation only from our clients. We do not sell any financial products, do not collect sales commissions, and do not accept referral fees. We receive no benefits from custodians/broker-dealers based on client securities transactions (so-called “soft dollar benefits”).

As of January 1, 2024, the principal owners of FVIM are Robert Pool, Matthew Ebeling and Andrea Silbernagel.

Investment Management

FVIM provides investment management services. We manage portfolios that often consist of multiple types of accounts, which may include joint, trust, IRA, etc. Portfolios are constructed in a manner that is appropriate for our client’s life circumstances.

Our investment philosophy is grounded in Modern Portfolio Theory, which refers to the process of reducing risk in a portfolio through systematic diversification across and within asset classes. We typically adhere to an evidence-based approach to investing and, thus, implement, asset-class mutual funds and exchange-traded funds, but may use actively managed mutual funds. FVIM typically does not recommend individual stocks or bonds.

FVIM analyzes mutual funds based on the fund’s total operating expenses, portfolio turnover, investment objective and investment restrictions and limitations. We typically invest in no-load institutional mutual funds including funds managed by Dimensional Fund Advisors (DFA), Vanguard, Avantis Investors, BlackRock and Schwab that have low operating expenses, low portfolio turnover, below-average capital gains distributions and a fundamental investment objective of investing in a particular asset class. Some mutual funds are available for investment only by clients of registered investment advisors, and all investments are subject to the approval of the advisor. This means that you may not be able to make additional investments in DFA mutual funds if you terminate your agreement with FVIM, except through another advisor authorized by DFA.

By developing a personalized investment strategy for each client, we are able to help our clients manage both their short-term and long-term financial objectives.

This process includes the construction of a well-diversified portfolio consistent with the client’s appetite for risk in conjunction with an ongoing assessment of the portfolio’s performance. The investment strategy is monitored continually to ensure alignment with the client’s long-term goals and financial objectives.

We do not sponsor or participate in any wrap-fee programs.

Per CCR Section 260.238 (k), FVIM will disclose material conflicts of interest regarding FVIM, representatives or any of our employees which could reasonably be expected to impair the rendering of unbiased and objective advice.

As of December 31, 2023, FVIM managed \$165,900,497 in assets, all on a discretionary basis.

Retirement Rollovers & Conflicts of Interest

If we make recommendations or provide advice related to a retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act ("ERISA") and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts.

When we recommend a client rollover their retirement plan assets into an account to be managed by FVIM, such recommendation creates a conflict of interest because we will be compensated if you follow our advice.

To manage this conflict, we operate under a special ERISA rule relating to retirement assets that requires us to act in your best interest and not put our interests ahead of yours.

Under this rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice)
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

While not always the case, a client or prospective client leaving an employer typically has the following four options regarding an existing retirement plan:

1. Retain the assets in the former employer's plan;
2. Rollover the assets to a Traditional IRA or Roth IRA;
3. Rollover the assets to the plan of a new employer; or
4. Receive a cash distribution.

Deciding which of the above options are right for you can be a complex process. For that reason, we will review and discuss each option with you. Additionally, we provide a written "Retirement Advice Disclosure" to assist our clients when making these decisions. Please let us know if you did not receive the above disclosure so we can provide it to you.

Retirement Planning

FVIM offers retirement planning for a fixed fee. This analysis reviews retirement planning, asset allocation, investment strategy among other analyses. FVIM will provide the client with a written report. The client will be responsible for executing any recommendations made by FVIM unless they choose to hire FVIM as their investment manager.

ITEM 5 - FEES AND COMPENSATION

Investment Management Clients

Our fees for new investment advisory services are as follows:

- 1.1% per annum up to \$500,000 under management, and
- 0.9% per annum for \$500,000 to \$1,000,000 under management, and
- 0.7% per annum for \$1,000,000 to \$5,000,000, and
- 0.5% per annum on amounts over \$5,000,000.

Our fees are calculated in arrears and are typically automatically deducted directly from our clients' brokerage account(s) on a quarterly basis in January, April, July and October. At the time fees are deducted each quarter, we provide clients with a fee calculation based on the fee schedule they agreed to in their service agreement and the client's portfolio balance at quarter end along with their quarterly reports. In cases where fees are not automatically deducted from a client's account, a bill is sent and fees are due upon receipt. At our discretion, some assets may be excluded from the fee calculation. Lower fees for comparable services may be available from other sources.

Fees may be amended from time to time by FVIM upon 60 days prior written notice to our clients.

In some cases, clients may receive the same services at a reduced rate or on a *pro bono* basis. This may be available for immediate family members or other scenarios on a case-by-case basis.

FVIM or the client may terminate the service agreement at any time by giving notice to the other party. Fees will be prorated through the last date services were rendered and are due upon receipt. Clients may terminate services within five (5) business days of signing the service agreement without penalty.

In addition to our investment advisory fees, client portfolios may be subject to fees charged by mutual funds and exchange traded funds and custodial expenses such as transaction fees.

We do not charge our current investment management clients extra fees for financial planning as this service is included in the investment management fee.

Retirement Planning

FVIM charges a flat fee of \$2,000 for Retirement Planning services. The fee is based on the estimated time FVIM expects to spend on the analysis. Our process includes working with the client to gather financial data, discuss goals in retirement, analyze current financial condition, develop an investment strategy to help the client work toward the goals and provide a written report. The client will be responsible for executing any recommendations made by FVIM unless they choose to hire FVIM as their investment manager. FVIM may negotiate this fee from time to time. Once retirement planning services are complete, the client will receive an invoice and fees are due upon receipt. If, upon completion of FVIM's retirement planning services the client chooses to hire FVIM for ongoing investment management services, FVIM may waive the retirement planning fee.

ITEM 6 - PERFORMANCE BASED FEES

FVIM does not charge fees based on performance.

ITEM 7 - TYPES OF CLIENTS

Our services are offered to individuals, trusts, pension plans, non-profits, profit sharing plans and others. Most of our clients are individuals and families.

We serve families with an average of \$1,000,000 in investable assets. Portfolios may be comprised of multiple account registrations, including joint, trust, IRA, 401(k), 403(b), other retirement accounts, minor children's accounts or others.

ITEM 8 - METHODS OF ANALYSIS, INVESTMENT STRATEGIES, AND RISK OF LOSS

Asset Allocation

Our investment management strategy takes an asset allocation approach. Studies show that asset allocation, which is the mix of different asset classes such as stocks, bonds, real estate, cash, etc., is the primary factor in investment returns.¹

Each client portfolio maintains a target asset allocation. At minimum, client portfolios are reviewed annually to evaluate the extent to which the actual allocation deviates from the target allocation. Where the deviation is considered excessive, FVIM will take the appropriate steps in order to bring the actual allocation back within an acceptable range of the target allocation. This process is referred to as "rebalancing" and is utilized with the intent of helping to maintain an expected level of risk.

FVIM's asset allocation decisions, with respect to stocks versus bonds, are primarily derived from the cash flow needs of our client. Therefore, the client's investment time horizon will greatly determine the overall structure of the portfolio. For example, clients that are currently making consistent cash withdrawals from their portfolio will have a portfolio structured with less volatility than a client that may not need to draw an income for many years.

Typically, our clients are investing for the purpose of keeping a sustainable cash flow throughout their joint life expectancy. In order to give them a higher probability of accomplishing this goal, our clients understand the need to take some risk. To address this, we strive to achieve an appropriate balance between lower volatility variability assets (such as bond funds) and long-term growth assets (primarily equity funds). Through our consultative approach, our clients understand that even with a properly diversified portfolio the equity allocation can vary significantly in a given year.

Security Selection

Once our client's asset allocation is determined, FVIM looks for appropriate investments available for each asset class. We typically use mutual funds and ETFs that offer broad diversification. Generally, we utilize investments that are readily marketable, and that have lower overall cost and high tax efficiency.

Most assets managed by FVIM have a long-term time horizon. We view inflation as a risk and attempt to grow our client portfolios in real, inflation-adjusted terms. Our focus on long-term returns means that there will be some short-term volatility. As a result, short-term losses are to be expected periodically. And, of course, there is no guarantee that the strategies will prove successful, even over the long term.

¹ Source: Dimensional Fund Advisors Study (2002).

We believe that frequent trading within an account can have a negative effect on overall return; therefore, we try to avoid frequent trading in our clients' accounts. However, there are times when it is advantageous to place trades more frequently (i.e. taking tax losses).

Tax Management

Our client portfolios may consist of multiple accounts with differing tax treatments of gains, interest, dividends and withdrawals. We attempt to minimize the long-term impact of taxes by taking advantage of the various tax-favored investments available. We also harvest tax losses, postpone a gain to achieve more favorable tax rates or may recommend a Roth conversion.

ITEM 9 - DISCIPLINARY INFORMATION

Neither FVIM nor any of our advisors have ever been involved in any events that have resulted in disciplinary actions from regulators, courts or the Certified Financial Planner Board of Standards.

ITEM 10 - OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

FVIM is not registered with the Financial Industry Regulatory Authority (FINRA) to receive commissions on investment product sales. In addition, none of our advisors have any relationship or affiliation that is potentially in conflict or material to our advisory business, such as that of independent broker-dealer, accountant, insurance representative, or real estate broker. Our only source of revenue comes directly from our clients. Please see the Fees and Compensation section for more details.

ITEM 11 - CODE OF ETHICS

FVIM has a fiduciary duty which guides us to put our clients' interests ahead of our own. We have adopted a Code of Ethics which deals with general ethical principles, client confidentiality, reporting personal trading, gifts and more. A copy of our Code of Ethics is available upon request.

FVIM and our individual employees have the option to buy and sell securities identical to those securities bought and sold for our clients in their own accounts. It is our policy that we must always put our clients' interests first and must not take advantage of our position.

ITEM 12 - BROKERAGE PRACTICES

Recommended Firms

All client assets are held with outside custodians (third parties that have actual possession of our clients' assets). FVIM primarily uses Charles Schwab & Co., Inc. ("Schwab" or "Schwab Institutional"). In rare circumstances, there may be a need to hold client assets elsewhere, such as annuities held at insurance companies or trusts that require assets be held at a different custodian.

When recommending a custodian (also known as a broker), we take into account a number of factors which may include custodial fees charged by the broker, commission rates, record keeping and reporting capabilities, among others. When we suggest a broker, we will attempt to minimize the total cost for all brokerage services paid by the client. However, a suggested broker may charge a higher fee for a particular type of service, such as a commission rate, than can be obtained from another broker.

The brokerage firms that we recommend are not affiliated with FVIM in any way. These firms may provide FVIM and our clients' access to their institutional trading and custody services which are typically not available to individual investors. Generally, these services are available to independent investment advisors

on an unsolicited basis, at no charge to them as long as they maintain certain minimum levels of client assets at the brokerage firms. Some of the services provided to FVIM include brokerage, custody, research and access to mutual funds and other investments that may not be available to an individual investor or may require a significantly higher initial investment.

Brokerage firms also have products and services that benefit FVIM, but may not benefit our clients' accounts directly. Some of these products and services assist us with managing and administering our clients' accounts. Some examples of these products and services include:

- Software and other technology that provide access to our client account data (i.e. trade confirmation and account statements).
- Facilitating trade execution (and allocation of aggregated trade orders for multiple client accounts).
- Providing research, pricing information and other market data.
- Facilitating payment of FVIM's fees from our clients' accounts.
- Assisting with back-office functions, recordkeeping and client reporting.

The brokerage firms may also provide FVIM with consulting, publications, conferences on practice management, information technology, marketing and regulatory compliance.

Research products and services we receive from Schwab may include the following:

- Financial publications.
- Information about particular companies and industries.
- Research software and other products or services that provide appropriate assistance to FVIM in the performance of its investment decision-making responsibilities.

These research products and services are provided to all investment advisors that use Schwab Institutional and are not considered to be paid for with soft dollars. ("Soft dollar" arrangements are defined as the receipt of research or other products or services, other than execution of trades, from a broker-dealer or a third party in connection with client securities transactions.) FVIM does not have a contract in place regarding any soft dollar arrangements with our custodian, Charles Schwab.

We review the relationships we have with our custodians on a regular basis to ensure that our clients receive good value, execution and services. When performing this review, we weigh the costs and benefits of moving accounts to other custodians.

Client-Directed Brokerage

Because client-directed brokerage can make it difficult for us to effectively negotiate brokerage compensation and obtain favorable net price and execution, we typically do not allow clients to direct brokerage.

Trade Aggregation

FVIM is authorized by our clients to use our discretion to aggregate purchases and sales and other transactions made for the account with purchases and sales and other transactions in the same or similar securities or instruments for other clients of ours. Many securities that we recommend are mutual funds which trade at one price at the end of each day. Other securities, such as ETFs, may trade at different prices throughout the day. When we place trades in ETFs, we may attempt to aggregate orders together so that our

clients receive the same price and there is not potential favoritism. Since it is typically not possible to conduct a single trade for all client positions, we have procedures in place to ensure that clients are not favored based on their portfolio size or any other factor.

ITEM 13 - REVIEW OF ACCOUNTS

Our investment advisor representatives conduct at least annual reviews of client portfolios. A review may also be triggered when there is a change in client circumstances, major market or economic events, deposit or significant withdrawal into or from a client's account or securities are transferred. During a review, accounts are analyzed by an advisor and the following areas are assessed:

- Accounts are rebalanced to ensure proper asset allocation.
- Portfolios are reviewed to ensure they are managed in a tax-efficient manner.
- Individual portfolio performance is in line with market expectations.

We continually research and monitor all positions in our clients' accounts. These positions are maintained or sold based upon this ongoing analysis.

In addition to the reports sent by the custodian (such as Schwab), we provide our clients with Billing Statements and Performance Reports each quarter. Our Privacy Policy is sent to all clients annually.

Our advisors usually meet with clients at least once per year either in person, on the phone or via an online meeting. The purpose of these meetings is to provide our clients and advisors the opportunity to review their accounts, go over any questions the client may have, discuss a client's changing situation or financial goals and, when appropriate, update their retirement plan.

We encourage our clients to contact us at any time with any questions, concerns or to update us as financial situations and goals change. We are available via e-mail, by phone, to meet in person or via online meetings.

ITEM 14 - CLIENT REFERRALS AND OTHER COMPENSATION

FVIM may enter into written agreements with companies who refer potential clients to us in exchange for a referral fee. The rules require the following:

- A written agreement between the solicitor and FVIM detailing the referral arrangement.
- When a potential client is referred to FVIM, they will receive a written document which discloses the solicitor relationship and compensation, including any fee to the client.
- If the referral becomes a client, FVIM must receive a signed and dated advisory agreement which acknowledges receipt of the firm's disclosure documents.

FVIM currently has an arrangement with WiserAdvisor where we pay when a client is referred to us. There is no additional cost to the client and links to FVIM's disclosure documents are provided by WiserAdvisor when the referral is made.

ITEM 15 - CUSTODY

FVIM's client accounts are held by Schwab, a qualified custodian. In general, except to withdraw fees and third-party movements, Fort Vancouver does not have custody of the assets in the account and shall have no liability for any loss or other harm to any property in the account. This includes harm resulting from the

insolvency of the custodian or any acts of the agents or employees of the custodian. We cannot ensure that when harm is caused whether or not the full amount of loss is covered by the Securities Investor Protection Corporation ("SIPC") or any other insurance which may be carried by the custodian. SIPC provides only limited protection for the loss of property held by a broker-dealer.

Clients are typically provided with account statements directly from Schwab at least quarterly. In order to ensure that all account transactions, holdings and values are correct and current, FVIM urges clients to compare our firm's statement with the statement you receive directly from the custodian.

ITEM 16 - INVESTMENT DISCRETION

FVIM accepts discretionary authority to manage client assets. This authority is authorized by our clients through our service agreement and in their brokerage account applications. Discretionary authority allows us to quickly and proactively manage our clients' accounts by giving us authority to perform the following tasks:

- Placing trades in clients' accounts.
- Deducting client fees.
- Disbursing client funds to address on record or other Schwab accounts that are held by client in like registration.

Allowing FVIM to have discretionary authority on your accounts, *does not* allow us to:

- Change the address or beneficiaries on your accounts.
- Withdraw funds from your account, except client fees.
- Disburse client funds except as authorized by client to address on record or another Schwab account with like registration.

ITEM 17 - VOTING CLIENT SECURITIES

FVIM invests in many securities that allow shareholders to vote on various issues, typically at an annual shareholder meeting. Investors who cannot attend the meeting have the ability to vote by proxy. It is our policy to not vote client securities, but we are available to help clients with questions they have regarding ballot items. Clients typically receive annual proxy forms from the custodian where their assets are held.

ITEM 18 - FINANCIAL INFORMATION

The SEC requires certain firms to provide financial information if they require pre-payment of fees. Since FVIM bills fees in arrears, we are exempt from this requirement. FVIM does not require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance. In addition, FVIM does not have any financial condition (including no prior bankruptcies or other financial complications) that is likely to impair our ability to meet our contractual commitments to our clients.

Due to the nature of our services, an audited balance sheet is not required in this disclosure document. FVIM does not have financial conditions that require further disclosure.