

## Form ADV Part 2a

**Q4, 2012**

This Brochure provides information about the qualifications and business practices of SaveDaily.com, Inc. ("SAVEDAILY"). If you have any questions about the contents of this Brochure, please contact us at 562.795.7500 or [support@savedaily.com](mailto:support@savedaily.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 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's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 – Material Changes

On July 28, 2010, the United State Securities and Exchange Commission published “Amendments to Form ADV” which amends the disclosure document that all advisors provide to clients as required by SEC Rules. This Brochure dated 09/11/2012 is a new document prepared according to the SEC’s new requirements and rules. As such, this Document is materially different in structure and requires certain new information that our previous brochure did not require.

In the future, this Item will discuss only specific material changes that are made to the Brochure and provide clients with a summary of such changes. We will also reference the date of our last annual update of our brochure. We will further provide clients with a new Brochure as necessary based on changes or new information, at any time, without charge. Currently, our Brochure may be requested by contacting us at 877.728.3359 or emailing customer support at [support@savedaily.com](mailto:support@savedaily.com)

### Item 3 – Table of Contents

Item 1 Cover Page	1
Item 2 Material Changes	2
Item 3 Table of Contents	3
Item 4 Advisory Business	4
Item 5 Sub-Advisory Business	4
Item 6 Fees and Compensation	4
Item 7 Performance-Based Fees and Side-By-Side Management	10
Item 8 Types of Clients	10
Item 9 Methods of Analysis, Investment Strategies and Risk of Loss	10
Item 10 Disciplinary Information	11
Item 11 Other Financial Industry Activities and Affiliations	11
Item 12 Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	11
Item 13 Brokerage Practices	12
Item 14 Review of Accounts	12
Item 15 Client Referrals and Other Compensation	12
Item 16 Custody	13
Item 17 Investment Discretion	13
Item 18 Voting Client Securities	13
Item 19 Financial Information	13

#### Item 4 – Advisory Business

SaveDaily.com, Inc. (“SAVEDAILY”) is a fee-only financial advisory firm. It was incorporated in 1999 and the principal owner is Harry S. Dent Jr.

SAVEDAILY focuses on providing financial planning services primarily through wrap fee programs and impersonal advisory services delivered to its clients through website interfaces owned and operated by SAVEDAILY or by partners of SAVEDAILY who act in an administrative capacity.

Advisory services may involve advice on income, cash flow management, retirement, financial independence, college funding, estate planning, investments, tax saving strategies, and risk management. Impersonal investment advisory services can be general in nature or focus on particular areas of interest, depending on the client’s stated needs at one of the aforementioned web interfaces. Advice and/or recommendations will be based upon information provided by the client, which the advisor will deem to be reliable. Advice and/or services may be limited in scope and are always impersonal in nature. These services are generally offered through allocations and models maintained by SAVEDAILY and delivered to clients under a wrap fee offering. The 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.

#### Item 5 – Sub-Advisory

SaveDaily.com, Inc. at times may contract with Outside Managers, in a sub-advisory type capacity in servicing clientele, as well as, servicing sponsor program(s). Investment Sub-Advisory Agreement (“Agreement”) confirms the agreement by and between Outside Manager and SaveDaily.com, Inc., a California registered investment adviser. The purpose of this agreement is to set forth the terms and conditions by which SaveDaily.com, Inc. will utilize the services of Outside Manager in a sub-advisory capacity.

#### Item 6 – Fees and Compensation

The specific manner in which fees are charged by SAVEDAILY is established in a client’s electronic agreement with SAVEDAILY. For new clients, SAVEDAILY will generally bill its fees on a quarterly basis to those clients participating in SAVEDAILY’s impersonal services brought to the client through allocations and models delivered via the aforementioned web interfaces.

Fees are generally based on the assets under management within the allocations and models and are generally collected via a liquidation of assets equal to the amount of the fee. Fees are subject to the Advisor’s discretion. All fees paid to SAVEDAILY for advisory services are separate from fees of brokerage commissions, transaction fees, and other related costs and expenses which may be incurred by the client.

Clients may incur certain charges imposed by custodians, brokers, third party investment and other third parties such as fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions.

Mutual funds and exchange traded funds (“ETF’s”) also charge internal management fees, which are disclosed in a fund’s prospectus. Such charges, fees and commissions are exclusive of and in addition to SAVEDAILY’s fee. SAVEDAILY may receive a portion of these other commissions, fees, and costs as described in Item 15.

SAVEDAILY offers no broker services. Item 13 further describes the factors that SAVEDAILY considers in selecting or recommending broker-dealers for client transactions and determining the reasonableness of their compensation (e.g., commissions).

Depending upon the type of investment vehicle you select, you may be charged Advisory Fees by the Adviser as described below.

(a) Individual Mutual Funds. If you choose to invest in individual mutual funds, you will not be charged an Advisory Fee. Advisory Fees will be charged on the Adviser's Managed Advisory Allocations as discussed below.

(b) Managed Advisory Allocations. If you select one of the Adviser's Managed Advisory Allocations, you will be charged an annual investment advisory fee ("Advisory Fee"). The Advisory Fee will be a percentage of the assets in each of your Managed Advisory Allocations. Each Managed Advisory Allocation has a different fee schedule, which is contained in the "Associated Services & Fees" document for each Managed Advisory Allocation. This document is available on this Website and will be presented to you for your review, acknowledgement, and agreement before you establish a Managed Advisory Allocation account.

The Advisory Fee will be charged on a quarterly basis (25% of the total fee per quarter) calculated based upon the value of your holdings on the 25th day of the last month in each quarter (the "Valuation Day"). You authorize the Adviser to deduct this amount from your holdings on a quarterly basis. The Adviser will charge this Advisory Fee within fifteen (15) days following each Valuation Day. The Advisory Fee will not be charged in the quarter in which you establish your account. Thus, the Advisory Fee will first be charged at the end of your first full quarter in the Managed Advisory Allocation.

The Advisory Fee initially will be charged against the Managed Advisory Allocation as a whole by deducting a pro rata amount from each fund in the percentages dictated by your asset allocation. The Adviser reserves the right to waive or reduce the Advisory Fee at any time for any client as it deems appropriate. Similar advisory services may be available for lower rates from other investment advisers, particularly for larger accounts. However, those investment advisers may have higher minimum account or minimum fee requirements. You should be aware that the Advisory Fees charged by SaveDaily are in addition to the 12b-1 fees and other fees (discussed below) charged by each of the mutual funds as outlined in each fund's prospectus.

(c) 12b-1 and Other Fees. You acknowledge that some of the mutual funds available through your Account also pay the Broker annual distribution and service fees ranging from 0.25% to 1% (known as "12b-1 Fees"). The 12b-1 fees are paid directly by the mutual funds to the Broker and the amount of the fee for each mutual fund is disclosed in its prospectus. These fees are deducted by the mutual funds from the total aggregate amount of assets invested in the fund. They are not deducted from your Account.

The Broker may pay the Adviser certain marketing fees. These fees will be paid by the Broker out of certain of its own revenues and will not be deducted from or charged against your Account.

Additional advisory services may be offered by the Adviser, which may require additional advisory fees. You will be informed of such additional fees before agreeing to accept any such additional services. We will not charge any such additional advisory service fees without your prior authorization.

**Other Fees:**

(a) Error Resolution Fees. You agree that you will be responsible for all error resolution fees related to ACH transactions from your bank account(s), including, but not limited to, charges related to insufficient funds, closed bank accounts, and incorrect bank account information, at a cost of \$25.00 per error. These error resolution fees will be charged against your designated bank account. If the Adviser is unable to pull the error resolution fees from your bank account due to insufficient funds in the bank account, the Adviser will attempt to pull the fees directly from your investments by redeeming the necessary shares. If this attempt to pull fees is unsuccessful, the Adviser will maintain your account in a suspended status until you remit payment of the error resolution fee.

(b) Manual Processing Fees. The Adviser is able to provide its services at a very low cost because it conducts most transactions and customer communications electronically. When the Adviser has to provide you with printed copies of documents, the Adviser incurs significant additional costs. Therefore, the Adviser will charge you \$10.00 for any such requests for hard copies of documents. You authorize the Adviser to debit the manual processing fees from your bank account by ACH debit to cover the manual processing fee as outlined in the Fee Schedule. If the Adviser attempts to charge your bank account for Manual Processing Fees, but is unable to do so due to insufficient funds, the Adviser will first attempt to deduct the fee from your investments by redeeming the necessary shares, then, if unable to do so, will suspend your account until payment of the fee is remitted.

SAVEDAILY's Direct fees are further outlined on the following page(s).

The cumulative effect of fees and expenses can substantially reduce the growth of your retirement savings. Visit the Department of Labor's Web site for an example showing the long-term effect of fees and expenses at [http://www.dol.gov/ebsa/publications/401k\\_employee.html](http://www.dol.gov/ebsa/publications/401k_employee.html). Fees and expenses are only one of many factors to consider when you decide to invest in an option. You may also want to think about whether an investment in a particular option, along with your other investments, will help you achieve your financial goals.

### SaveDaily.com, Inc. Safe Harbor IRA Fee Information

These fees are in addition to Total Annual Operating Expenses of Money Market Funds, ETF's or Mutual Funds.

Table 1—Safe Harbor Fees and Expenses		
Name / Type of Option	Expense	Participant-Type Fees/Info
<b>Fees</b>		
Custodial	Annual \$10.00	See written IRA plan document services agreement in kit for further information related to plan services and detailed explanation of custodial related services
Account	Annual \$60.00	
Account Setup	One \$70.00 Time	
<b>Optional Service Fees</b>		
Missing Participant	Annual \$30.00	N/A
Distribution	\$25.00	Per distribution
Checks	\$25.00	Per check cut
Error Resolution	\$25.00	Per occurrence (NSF, ACH, Closed Accounts)*

\*See services agreement for full description of error resolution fee charges.

### SaveDaily.com, Inc. IRA Fee Information

These fees are in addition to Total Annual Operating Expenses of the Money Market Funds, ETF's or Mutual Funds.

Table 2—IRA Fees and Expenses		
Name / Type of Option	Expense	Participant-Type Fees/Info
<b>Fees</b>		
Custodial	Annual \$15.00	See online or written plan services agreement in kit for further information related to plan services and detailed explanation of custody related services
Account	Annual \$93.24	Charged monthly (\$7.77/month)
Account Setup	One Time \$75.00	
<b>Optional Service Fees</b>		
Termination	\$75.00	If closed prior to 1 year
Distribution	\$30.00	Per distribution
Checks	\$25.00	Per check cut
Error Resolution	\$25.00	Per occurrence (NSF, ACH, Closed Accounts)*

\*See services agreement for full description of error resolution fee charges.



### SaveDaily.com, Inc. Non-Qualified Account Fee Information

These fees are in addition to Total Annual Operating Expenses of the Money Market Funds, ETF's or Mutual Funds.

Table 3—Non-Qualified Fees and Expenses		
Name / Type of Option	Expense	Participant-Type Fees/Info
<b>Fees</b>		
Account	Annual \$93.24	Charged monthly (\$7.77/month)
<b>Optional Service Fees</b>		
Checks	\$25.00	Per check cut
Error Resolution	\$25.00	Per occurrence (NSF, ACH, Closed Accounts)*

\*See services agreement for full description of error resolution fee charges.

### **Item 7 – Performance-Based Fees and Side-By-Side Management**

The advisory fees collected by SAVEDAILY represent assets based charges for impersonal advisory services only. The firm does not charge performance-related fees of this nature (fees based on a share of capital gains on or capital appreciation of the assets of a client). SAVEDAILY does not and will not have custody of clients' funds for securities.

### **Item 8 – Types of Clients**

SAVEDAILY provides advisory services to individuals, families, businesses, trusts, estates, charitable institutions, pension and profit sharing plans, and other organizations. 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 9 – Methods of Analysis, Investment Strategies and Risk of Loss**

SAVEDAILY measures investors' goals, risk tolerance and time horizon through an online electronic impersonal interview process in an effort to determine investment allocations or models that, according to the advisors' judgment, are best suited to fit the client's needs. In providing its financial planning services, SAVEDAILY looks to meet the stated goals of the client, whether long-term or short-term. Using electronic rule sets, SAVEDAILY evaluates the client's financial needs in an impersonal manner. The Advisor designs investment and risk management strategies and embeds the resultant strategies into allocations and models, generally leveraging only mutual funds, to help the advisor's client achieve his or her financial goals.

If the Advisor provides specific investment strategies, in the form of allocations and models, this information may be based upon a number of concepts and determined by the type of investor. SAVEDAILY investment recommendations reflect certain principles and considerations. Your investment accounts are not necessarily considered as a single integrated portfolio. We may make recommendations to diversify the portfolio across several asset classes. Tax efficiency is important but is not the sole consideration in developing our allocations and models.

Finally, we pay close attention to investment expenses and numerous other factors related to individual investment selection. Investment strategies may include long-term and short-term purchases. The concept of asset allocation, or spreading investments among a number of asset classes (domestic stocks vs. foreign stocks; large cap stocks vs. small cap stocks; corporate bonds vs. government securities), is in the forefront of our strategies. Asset allocation seeks to achieve the most efficient diversification of assets, to lessen risk while not sacrificing the effectiveness of the portfolio to yield the client's objectives.

Since SAVEDAILY believes that risk reduction is a key element to long-term investment success, asset allocation principles are a key part of the firm's overall approach in preparing advice for Clients. SAVEDAILY generally 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/ETF's 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, US 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 (“ETF’s”) 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 criteria: pure no-load, expense ratio, 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 10 – Disciplinary Info**

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 11 – Other Financial Industry Activities and Affiliations**

SAVEDAILY is engaged in fee-only financial planning, as described more fully in Item 4. SAVEDAILY may provide advisory services to other financial advisory firms on a sub-contractual basis or on an as needed basis for their clients. SAVEDAILY does refer clients to other Investment Advisory Firms in return for a fee. Referrals may be provided only as a service to clients and as requested by clients through our web interfaces and we may receive compensation from the Advisory Firm.

SAVEDAILY does have 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.

#### **Item 12 – 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](mailto:support@savedaily.com), or by calling us at 562.795.7500.

### **Item 13 – 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.

### **Item 14 – Review of Accounts**

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.

Clients receive standard account statements from SAVEDAILY quarterly, monthly, and/or as transactions occur, in an electronic format.

### **Item 15 – Client Referrals and Other Compensation**

SAVEDAILY may receive compensation for client referrals as stated in Item 12. SAVEDAILY employees attend conferences at which exhibitors have booths. Employees may accept trinkets at conference exhibit booths as long as the trinkets are less than \$50 in value. Employees may also receive gift baskets or similar items from other professionals, as long as they are less than \$50 in value.

### **Item 16 – Custody**

SAVEDAILY uses UMB bank as a passive custodian to custody funds. Our firm does not have actual or constructive custody of client accounts.

### **Item 17 – 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 18 – Voting Client Securities**

As a matter of firm policy and practice, SAVEDAILY may retain 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.

### **Item 19 – Financial Information**

Registered investment advisors are required in this Item to provide you with certain financial information or disclosures about SAVEDAILY's financial condition.

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 \$1200 per client more than six months in advance of services rendered. Therefore, we are not required to include a financial statement.