

Firm Brochure
Form ADV Part 2A

March 31, 2014

This Brochure provides information about the qualifications and business practices of SaveDaily.com, Inc. (hereafter “SAVEDAILY”, “we”, “our”, “us” or “firm”). If you have any questions about the contents of this Brochure, please contact us at 562.795.7500 or support@savedaily.com. The information in this Brochure has not been approved or verified by the United States Securities 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.

Item 2 – Material Changes

This Firm Brochure, dated March 26, 2014 contains amendments and new information since the last filing of our ADV Part 2A (Brochure) on October 14, 2013.

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

1. Item 4 – Advisory Business:

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

- i. The SaveDaily.com “Private Labeled” Platform
- ii. The SaveDaily.com “Retail” Platform
- iii. SAVYInvesting Model Portfolios (new)
- iv. Participation in Wrap Fee Programs

Changes in organization: A majority vote of the shareholders approved that SaveDaily, Inc. continue its operations as a private company and discontinue the trading of its stock on the Over the Counter Bulletin Board. The structure of the private company includes a newly formed Nevada holding company named SaveDaily Holdings Corp. that merged with SaveDaily, Inc. (the entity that was previously publicly traded) which was concluded on November 27, 2013. This holding company will own 100% of SaveDaily.com, Inc. SaveDaily Holdings Corp.’s largest shareholder is the SaveDaily Partners, LP which is controlled by Quail Bend Partners LLC, which is controlled by Steve Durbin.

2. Item 5 – Fees and Compensation:

We have made changes in the way we disclose our fees. However our fee structure has not changed. Additionally we have added a new disclosure related to the SAVYInvesting Model Portfolios service that corresponds to the service offering listed in Item 4 of this Brochure.

3. Item 10 – Other Financial Industry Activities and Affiliations:

We have added a disclosed as a result to a new affiliated insurance brokerage company that is under common ownership and control with SAVEDAILY.

4. Item 13 – Review of Accounts

We have enhanced and expanded the disclosures on how and when accounts are reviewed for each service offering.

5. Item 14 – Client Referrals and Other Compensation:

We have enhanced and added disclosures related to client referrals and other compensation.

6. Item 17 – Voting Client Securities

We have expanded our disclosures relating to when and how client can receive information related to SAVEDAILY’s proxy voting procedures and voting records.

Item 3 – Table of Contents

Contents

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

Item 4 – Advisory Business

SaveDaily.com, Inc. (“SaveDaily”) is an SEC registered investment adviser located in Seal Beach, California and was incorporated in 1999. The company’s largest shareholder is the SaveDaily Partners, LP which is controlled by Quail Bend Partners LLC, which is controlled by Steve Durbin.

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

SAVEDAILY provides the following services:

The SaveDaily.com “Private Labeled” Platform:

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

Impersonal Investment Advice:

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

Asset Allocation Models:

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

The SaveDaily.com “Retail” Platform:

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

Impersonal Investment Advice:

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

Asset Allocation Models:

SAVEDAILY offers individuals the ability to select Asset Allocation Models comprised of mutual funds or ETF. Each model is designed for general investment objectives and does not purport to meet the individual

needs or objectives of specific individuals. The Asset Allocation recommendations are based on a series of answers to various investor profile and personal finance related questions. Once an asset allocation has been selected by the Client, SAVEDAILY will maintain the asset allocation selected by the client. SAVEDAILY does not provide any personalized and or individual investment advice to any client on the SaveDaily.com platform.

SAVYInvesting Model Portfolios:

Acting as investment adviser, SAVEDAILY (d.b.a. SAVY Investing) offers a Model Portfolio service under the name of "SAVY Risk Managed Strategy". The SAVY Risk Managed Strategy is comprised of twelve (12) model portfolios, six (6) model mutual fund portfolios and six (6) ETF model portfolios. The model portfolios are managed to help investors protect asset growth during bull markets and defend them against major losses during market turn downs. The SAVY model portfolios are licensed to various overlay managers that these model portfolios available to third-party investment advisers, who in turn offer them to their clients. SAVEDAILY does not offer the SAVY Risk Strategy directly to retail investors or through its proprietary platforms.

The SAVY Risk Managed Strategy model portfolios are based entirely on The Milliman Risk Managed Strategy® and are sub-advised by Milliman Financial Risk Management, LLC an unaffiliated registered investment adviser. Milliman advises SAVY regarding the model portfolios using tactical and quantitative asset allocation investment techniques. SAVY, in turn, provides the requisite information to the overlay manager.

Participation in Wrap Fee Programs

SAVEDAILY does not sponsor or directly participate in any Wrap Fee Programs. However, due to the nature of the arrangements described under the "SAVY Investing Model Portfolio" service, the SAVY Model Portfolios may be included in various programs, including wrap programs, offered by other Financial Institutions that utilize overlay managers that the license the SAVY Model Portfolios.

Assets Under Management

SAVEDAILY managed total assets of \$287,430,705 for Clients. All Client accounts are managed and/or administered on a non-discretionary basis pursuant to instructions received from either the Client, the Client's Financial Institution(s) or the Financial Institutions overlay manager(s) pursuant to a limited power of attorney.

Item 5 – Fees and Compensation

The SaveDaily.com "Private Labeled" Platform Fees:

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

The SaveDaily.com "Retail" Platform Fees:

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

SAVYInvesting Model Portfolios Fees:

SAVEDAILY earns an advisory fees that accrues quarterly based on market value of the assets being managed pursuant SAVY Risk Managed Strategy Model Portfolios as of the close of the last day of the previous calendar quarter. The annual advisory fee for this service generally ranges between 48 and 60 basis points, which is paid by the licensee or Financial Institution directly to SAVEDAILY.

GENERAL FEE INFORMATION

Termination of the Advisory Relationship:

A client agreement may be canceled at any time, by either party, for any reason upon receipt of 30 days written notice. Upon termination of any account, any prepaid, unearned fees will be promptly refunded. In calculating a client's reimbursement of fees, we will pro rate the reimbursement according to the number of days remaining in the billing period.

Additional Fees and Expenses:

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

Mutual Fund Fees:

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

Wrap Fee Programs Fees:

Clients participating in third-party separately managed account programs may be charged various program fees that include the SAVYInvesting Model Portfolio Fees. Such fees may include the investment advisory fees of the Sponsor, Investment Professionals, or independent advisers, which may be charged as part of a wrap fee arrangement. In a wrap fee arrangement, Clients pay a single fee for advisory, brokerage and custodial services. Client's portfolio transactions may be executed without commission charge in a wrap fee arrangement. In evaluating such an arrangement, the Client should also consider that, depending upon the level of the wrap fee charged by the broker-dealer or investment adviser, the amount of portfolio activity in the Client's account, and other factors, the wrap fee may or may not exceed the aggregate cost of such services if they were to be provided separately.

Advisory Fees in General:

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

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

SAVEDAILY does accept performance-related fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

Item 7 – Types of Clients

SAVEDAILY provides advisory services to the following types of client:

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

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

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

SAVEDAILY 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 9 – Disciplinary Information

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

Item 10 – Other Financial Industry Activities and Affiliations

Insurance Agent Affiliations

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



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individuals when considering implementation of advisory recommendations. The implementation of any or all recommendations is solely at the discretion of the client.

Item 11 – Code of Ethics

Our firm has adopted a Code of Ethics which sets forth high ethical standards of business conduct that we require of our employees, including compliance with applicable federal securities laws.

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

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

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

Item 12 – Brokerage Practices

SAVEDAILY leverages firms such as Fidelity, TD Ameritrade, Schwab, LPL Financial or similar broker-dealer firms in its electronic online offerings to clients. Firm selection is based on the characteristics of the electronic online offering and the partner acting as an administrator of such offering. Quality and cost of services provided along with the impersonal assessment of client needs are factors in the selection process.

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

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

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

Item 13 – Review of Accounts

Impersonal Investment Advice:

SAVEDAILY focuses on providing financial planning services which may involve impersonal advice on income, cash flow management, retirement, financial independence, college funding, estate planning, investment portfolio issues, tax saving strategies, and risk management. These services are offered on an impersonal basis through electronic rule sets offered to our clients at our web interfaces. The impersonal advice given may include the recommendation of



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annual reviews/updates and it would be the client's responsibility to initiate additional services as may be needed. SAVEDAILY does not review client accounts for impersonal investment advice.

Asset Allocation Models:

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

SAVYInvesting Model Portfolios:

The SAVY models are licensed to various Financial Institutions who in turn offer them to their clients on various platforms. SAVEDAILY does not offer the SAVY Risk Strategy directly to retail investors or through its proprietary platforms. The SAVY Risk Managed Strategy model portfolios are monitored and are sub-advised by Milliman Financial Risk Management, LLC. SAVEDAILY regularly reviews the performance of the models and Milliman's performance based on the model portfolio's investment objective. SAVEDAILY does not provide statements to underlying clients under this platform. Statements are provided by the Financial Institutions who offer this service to their clients.

Item 14 – Client Referrals and Other Compensation

Other Third-Party Relationships

SAVEDAILY has professional relationships with other third parties and may receive hard dollar compensation from those third parties. SAVEDAILY has made arrangements for clients to receive discounted services from some of these third parties. Being a client of SAVEDAILY may require the use of a particular custodian depending on the web offering being utilized by the client. Examples of other third parties would include broker dealers, investment companies, mutual funds, banking institutions, insurance agencies, accounting firms, law firms, real estate brokers, pension consultants, and other investment advisors. Some of our clients may also work for one of these third parties.

Solicitor Relationships and Client Referrals

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

Other Compensation

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

Item 15 – Custody

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

Item 16 – Investment Discretion

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

Item 17 – Voting Client Securities

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

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

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

Item 18 – Financial Information

SAVEDAILY has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding. Under no circumstances do we require or solicit payment of fees in excess of \$1200 per client more than six months in advance of services rendered. Therefore, we are not required to include a financial statement.