

FORM ADV PART 2A

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March 29, 2018

This Brochure provides information about the qualifications and business practices of SaveDaily.com, Inc., (“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 or Exchange Commission (“SEC”) or by any state securities authority. Additional information about SaveDaily.com, Inc. and its business also is available on the SEC website at www.adviserinfo.sec.gov. SaveDaily.com, Inc. is a registered investment adviser. Registration of an investment adviser does not imply any level of skill or training.

Item 2 – Material Changes

This Firm Brochure dated March 29, 2018, contains minor revisions since the last update of our Form ADV, Part 2A (“Brochure”) on March 30, 2017. This Brochure has revised an area of providing ETF’s in Section IV. Except as disclosed below in the summary of material changes, the updates generally do not reflect a change in business practices or conflicts of interest. Following is a summary of material changes made since the last annual update on March 30, 2017:

- Item 4 – Asset Allocation Models and Evaluation Tools

SaveDaily makes available on its Platform asset allocation models comprised of mutual funds that are designed for a range of specific investment objectives. Direct customers, as well as the underlying investors of Partner Financial Institutions, may choose to invest through the asset allocation models.

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Item 4 Advisory Business

SaveDaily is an SEC registered investment adviser located in Costa Mesa, California incorporated in 1999. The company's largest shareholder is SaveDaily Partners LP, which is managed by Quail Bend GP, LLC ("Quail Bend"). Quail Bend is controlled by Steve Durbin, a director of the firm.

SaveDaily's primary business is providing investment-related technology and recordkeeping services to retail investors and financial institutions, to provide the mass market with access to low-cost mutual fund investing. SaveDaily's proprietary internet-based financial services technology platform (the "SaveDaily Platform" or "Platform"), in use since 2008, helps financial institutions to bring affordable investment services to everyday savers and investors. SaveDaily also offers non-advisory retirement plan distribution services to third-party plan administrators ("TPAs"), retirement plan sponsors and plan administrators.

SaveDaily does not sponsor, participate in, or provide any services to wrap fee programs. Unless SaveDaily otherwise agrees in writing to provide investment advisory services to its customers, it is not in the business of providing advisory services or acting as an investment adviser with respect to assets invested through its Platform. Where SaveDaily does provide advisory services, those services are limited to providing investors on its Platform with asset allocation models, and other investment-related educational tools for self-directed investing ("Evaluation Tools").

The SaveDaily Platform is offered through both "retail" and "financial intermediary" channels.

- The retail version of the SaveDaily Platform is offered to investors who contact SaveDaily directly, or are referred to us by other strategic partners or as part of a solicitation arrangement (together, "direct customers") (see *"Item 14 – Client Referrals and Other Compensation"* below for additional information on our customer referral arrangements). As described below, SaveDaily provides a range of retirement plan distribution services to TPAs, retirement plan sponsors and plan administrators. These services include investment-related services to the underlying beneficiaries of 401(k) retirement plans whose accounts have been terminated and "rolled over" to an IRA under an Internal Revenue Code and Department of Labor regulatory safe harbor. These underlying beneficiaries ("missing participants") may, if "found," elect to use the retail version of SaveDaily's Platform for investment-related services, at which time they would be considered direct customers.
- The financial intermediary versions of the Platform are developed by SaveDaily to enable banks, credit unions, investment advisers, third party administrations and broker-dealers with whom it partners (collectively, "Partner Financial Institutions") to offer mutual fund investment solutions to their customers for substantially less than the cost of a traditional financial adviser. SaveDaily provides such Partner Financial Institutions with a range of technology and recordkeeping solutions so that they may better service their underlying customers.

Both the retail and financial intermediary versions of the Platform offer non-advisory recordkeeping and technology services, as well as advisory services. These two services are described below:

Recordkeeping and Technology Services

SaveDaily provides mutual fund recordkeeping and technology services through the Platform. As part of its recordkeeping and technology services, SaveDaily provides the underlying investors who use the SaveDaily Platform with quarterly and annual statements by e-mail.

Asset Allocation Models and Evaluation Tools

SaveDaily makes available on its Platform asset allocation models comprised of mutual funds that are designed for a range of specific investment objectives. Direct customers, as well as the underlying investors of Partner Financial Institutions, may choose to invest through the asset allocation models.

SaveDaily may assist investors in recommending an appropriate asset allocation model or model portfolio by offering an investment questionnaire designed to assist self-directed investors in determining which asset allocation may be appropriate for their investment objectives, investment criteria, and time frame. Investors may select the asset allocation model recommended by SaveDaily, or may choose from the models offered.

SaveDaily also provides Evaluation Tools to assist self-directed investors in selecting particular mutual funds that may meet criteria established by the investor. This information is provided at a particular point in time and SaveDaily is under no obligation to update the results nor does it provide any ongoing investment advice, including any continuous or regular account supervision or management, to investors who use the Evaluation Tools. The information provided by the Evaluation Tools is based on a limited set of questions designed to capture general investment information, and does not purport to meet the individual objectives or needs of specific investors.

Retirement Plan Distribution Services

In addition to the services provided through the Platform, SaveDaily partners with TPAs, retirement plan administrators and sponsors to provide a range of services designed to facilitate distribution of assets from qualified retirement plans. These services include benefit payments processing; establishing rollover IRA accounts for terminated plan participants; locating missing plan participants regarding their rollover IRA accounts; offering investment-related services to located missing plan participants; and handling uncashed checks to TPAs, plan sponsors and plan administrators. SaveDaily also provides simple, cost-effective solutions in the abandoned retirement plan space, designed to assist TPAs, plan sponsors and plan administrators with proper termination of abandoned plans while appropriately managing associated assets. SaveDaily's retirement plan distribution services, including the investment-related technology and recordkeeping services available for rollover IRA account holders, are non-advisory in nature and do not involve the provision of investment advice.

As of December 31, 2017, SaveDaily had approximately \$1,248,781.35 in assets under management, which consists entirely of discretionary assets under management. SaveDaily does not have any non-discretionary assets under management.

Item 5 Fees and Compensation

Financial Intermediary Platform Fees:

Each Partner Financial Institution negotiates and enters into an agreement with SaveDaily. The terms and conditions of each agreement are unique to the services provided to the Partner Financial Institution and its end-user clients by SaveDaily, and therefore fees may vary between investors who receive services through a financial intermediary version of the Platform. SaveDaily generally receives start-up fees from Partner Financial Institutions for the development of a financial intermediary Platform. In addition, SaveDaily will receive from investors (i) a monthly account fee typically ranging from \$2.00 to \$8.85 per end-user account, or; (ii) a fixed percentage fee typically ranging from 15 bps to 150 bps of account assets per annum, or; (iii) some combination of a fixed fee amount and a fixed percentage fee. Fees are charged at the end of each calendar month, and are paid either by ACH wire transfer from the client's underlying bank account, or by deducting the fee directly from the end-user's account held with a qualified custodian.

Retail Platform Fees:

Retail investors that establish an account directly with SaveDaily pay an annual Platform fee of \$93.24 (\$7.77 monthly) for services offered on the SaveDaily Retail Platform. The fee is charged at the end of each calendar month, and is paid either by ACH wire transfer from the client's underlying bank account, or by deducting the fee directly from the end-user's account held with a qualified custodian.

Asset Allocation Model Fees:

Investors in the asset allocation models pay an investment advisory fee based on a percentage of assets under management. The investment advisory fee for the asset allocation models ranges from 0.25% to 1.50%, and is standardized for investors based on the allocation selected, and whether the model is offered through a Partner Financial Institution. The advisory fee is deducted from an investor's assets on a quarterly basis, at the end of each calendar quarter.

Investment-Related 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 financial intermediaries or broker-dealers, including, but not limited to, any transaction charges imposed by a platform sponsor or broker-dealer with which the financial intermediaries effects transactions for the Client's account(s).

SaveDaily's Platform fees are separate and distinct from the fees and expenses charged by mutual funds and/or ETFs to their shareholders. SaveDaily's Platform fees do not include fees associated with the mutual funds and/or ETFs held by investors through the Platform. These fees and expenses are described in each fund's prospectus, which investors may access on their personalized Platform dashboard. These fees will generally include a management fee, other fund expenses, and a possible distribution fee. If the fund also imposes sales charges, an investor may pay an initial or deferred sales charge. Investors should review both the fees charged by the funds and our Platform to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

[Retirement Plan Distribution Fees and Expenses](#)

SaveDaily is entitled to receive fee-based compensation in connection with its non-advisory distribution services to retirement plan participants, plan administrators and plan sponsors. Such fees and expenses relate to SaveDaily's administrative, custodial, and recordkeeping services, and are detailed in the respective services agreement with the plan participant, administrator, IRA custodian, or sponsor.

[Account Termination](#)

An investor's services or advisory agreement may be canceled at any time, by either party, for any reason upon receipt of 30 days written notice. Investors who terminate their accounts will be responsible for a pro-rata portion of any fees incurred since their last full billing cycle, and SaveDaily will refund any unearned, prepaid fees.

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

SaveDaily does not charge or receive 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 investment advisory services to clients who elect, through the SaveDaily Platform, to invest in a mutual fund asset allocation model. These clients include:

- Individuals
- High Net-Worth Individuals
- Rollover IRA Account Holders (Individuals)

There are no minimum asset, income, or investment requirements to use SaveDaily's Platform or invest in the asset allocation models.

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

SaveDaily's Platform-based Evaluation Tools and asset allocation models assist investors with measuring their investment goals, risk tolerance and time horizon through an online electronic data gathering process in an effort to identify investment allocations or models that might be appropriate for the investor's needs. In providing these Evaluation Tools, SaveDaily can assist the self-directed investor with meeting their stated goals, whether long-term or short-term. SaveDaily does not provide specific investment strategies or ongoing advisory services with the exception of the asset allocation models.

The investor's self-directed investment selections reflect the data provided by the investor, and the selections may or may not result in diversification of the portfolio across several asset classes. Tax efficiency is an important consideration in developing allocations and models, but is not considered in these self-directed investment solutions.

Since risk reduction is a key element to long-term investment success, asset allocation principles are a key consideration in providing the investor with a spectrum of investment alternatives. SaveDaily does not recommend specific individual securities or specific sectors within most asset classes. SaveDaily does not recommend individual company stocks or bonds or select funds focused on sectors such as Biotechnology, Utilities, Natural Resources, etc. SaveDaily's Evaluation Tools and asset allocation models provide exposure to asset classes through mutual funds and ETFs that invest in a broad asset class. These asset classes include U.S. Large Capitalization Stocks, U.S. Mid-Capitalization Stocks, U.S. Small Capitalization Stocks, Foreign Stocks, Alternative Asset Classes and Strategies, Short and Intermediate Fixed Income Securities, Cash and Cash Equivalents.

SaveDaily generally recommends no-load mutual funds or ETFs that represent either an index or managed portfolio of individual securities diversified within the target asset class. When recommending a specific fund, we consider the following factors: pure no-load, low expense ratio, acceptable 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.

Investing in securities involves risk of loss that clients should be prepared to bear. SaveDaily in no way guarantees performance or results. SaveDaily encourages that investor portfolios are evaluated to determine if rebalancing is appropriate for an investor's target asset allocation and risk profile. Investors who invest in mutual funds and/or ETFs using our Platform-based recordkeeping and technology services are responsible for reviewing and rebalancing their portfolios. 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

SaveDaily does not engage in any other financial industry activities, or have any other financial industry affiliations, that would be material to our advisory business or to clients.

Item 11 – Code of Ethics

Our firm has adopted a Code of Ethics (“Code”) 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 but to the general principles that guide the Code.

Item 12 – Brokerage Practices

SaveDaily leverages industry-leading brokerage firms to provide execution and clearing services for its Platform offerings. SaveDaily takes into account a range of different factors when selecting a broker to provide execution and clearing services, including the characteristics of the online offering, the Partner Financial Institution sponsoring the offering, and whether or not the brokerage platform has agreements with the underlying mutual funds that investors and the Partner Financial Institution want to access. Quality and cost of services provided also factors into the selection process.

Brokers that are selected to execute transactions may from time to time refer clients to our firm. SaveDaily does not make commitments to any broker or dealer under which we would compensate that broker or dealer through brokerage transactions for client referrals. SaveDaily does not receive soft dollar benefits.

SaveDaily may aggregate, or combine, transaction orders of securities being made simultaneously for more than one investor account. SaveDaily will seek to allocate orders and investment opportunities among investors in a manner that it believes is equitable and in the best interests of all investors on its Platform.

Item 13 – Review of Accounts

SaveDaily does not periodically review the accounts of investors who may use our Evaluation Tools, since those tools provide advice only at a particular point in time and do not involve continuous or regular supervision or management. With respect to the asset allocation models, SaveDaily reviews client accounts on quarterly basis to determine whether changes to the client’s

investment allocation are appropriate. Investment Committee is responsible for conducting the quarterly review. Individual clients who have selected an asset allocation model will generally receive standard account statements from SaveDaily on a quarterly and annual basis, in an electronic format.

Item 14 – Client Referrals and Other Compensation

Other Third-Party Relationships

SaveDaily has professional relationships with other third parties and may receive compensation and benefits 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 advisers. 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, 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.

SaveDaily offers a referral bonus program in connection with its retirement plan distribution services. Participating TPAs who transfer to SaveDaily any retirement plan participant with at least a \$500.00 rollover IRA balance receive a \$50.00 referral fee. The plan participant's account must remain with SaveDaily for at least 30 days in order for the TPA to receive the \$50.00 referral.

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 have actual custody of assets invested through its Platform. Assets may be held with third-party qualified custodians such as banks or broker-dealers, or directly by the fund issuer. In connection with providing non-advisory technology and recordkeeping services for the Platform or in those cases where it serves as recordkeeper in connection with its retirement plan

distribution services, SaveDaily issues quarterly and annual account statements to investors via e-mail.

Item 16 – Investment Discretion

In those cases where SaveDaily is providing asset allocation models, clients grant SaveDaily discretionary authority to replace specific funds or change the allocation percentages of the models. This authority is granted in the services or advisory agreement that the client enters into with SaveDaily.

Item 17 – Voting Client Securities

SaveDaily may have the authority to vote proxies on behalf of investors, as set forth in the terms of the applicable services or advisory agreement with the underlying investor.

When SaveDaily has discretion to vote proxies on behalf of clients, it will vote those proxies in what it determines to be the best interests of our clients and in accordance with 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 its contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding during the past ten years. Under no circumstances do we require or solicit payment of fees in excess of \$1,200 per client more than six months in advance of services rendered.