

# **MyFinancialadvice, Inc.**

## **Firm Brochure**

**The date of this Brochure and the information in it is March 31, 2013**

### **MyFinancialadvice, Inc.**

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This Brochure provides information about the qualifications and business practices of MyFinancialadvice, Inc. (in this Brochure, we refer to MyFinancialadvice, Inc. as ***MyFinancialadvice*** or the ***Firm***). If you have any questions about the contents of this Brochure, please contact:

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The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or any state securities authority.

MyFinancialadvice, Inc. is registered as an investment adviser with the U.S. Securities and Exchange Commission. Registration does not imply that the Firm has any certain level of skill or training.

Additional information about MyFinancialadvice, Inc. is available on the Website of the U.S. Securities and Exchange Commission at: [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

## **Item 2 - Material Changes**

The date of this Brochure has been updated to the current date. The Firm has deleted some nonmaterial language in Item 5. The remaining information in this Brochure has not changed since the Firm last updated its Form ADV and Brochure in December 2012.

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## Item 4 - Advisory Business

### A. The Firm

MyFinancialadvice, Inc. was formed as a corporation under the laws of the state of Delaware on September 15, 2003. The Firm has been registered as an investment adviser with the U.S. Securities and Exchange Commission (*SEC*) since November 5, 2003 and has been conducting its current business since that date. The Firm is managed by a board of directors, which appoints officers to conduct the day-to-day operations of the Firm. The following are the current officers and directors of MyFinancialadvice:

Ronald P. Peremel,	Director, Chairman of the Board of Directors, Chief Executive Officer, President
Kevin P. Condon	Director, Executive Vice President – Adviser Services, Chief Compliance Officer and Secretary
Elaine Edith Kops-Bedel	Director
Richard L. Byhre	Director
Richard B. Wagner	Director

The shareholders elect the directors. Mr. Byhre directly owns between 10% and 11% of the outstanding voting, common stock of the Firm. No other shareholder owns or controls, directly or indirectly, more than 10% of the voting common stock of the Firm.

### B. Types of Services

#### 1. Electronic Listing Services

##### a. Standard Advisor Listing

MyFinancialadvice maintains a Website at [www.myfinancialadvice.com](http://www.myfinancialadvice.com) (*MFA Website*) that provides an electronic listing service where members of the public (*Consumers*) can obtain advice about a variety of issues from professionals (*Advisors*) who offer their services through the Website. Most of the advice provided through the MFA Website relates to investments, but there are Advisors listed on the MFA Website who offer advice on a variety of other topics, such as insurance, real estate and tax.

MyFinancialadvice maintains the Website, reviews the qualifications of the Advisors who want to offer advice through the Website and provides access to Consumers who seek advice from the Advisors. MyFinancialadvice does not provide advice itself, it does not manage assets for clients and it does not serve as an Advisor through the Website. The services of MyFinancialadvice related to the Advisor Listings are generally limited to

- (1) obtaining the names of persons with appropriate credentials that appear to have the necessary qualifications to give advice on various topics of interest to Consumers;
- (2) providing a web-based platform where Consumers can obtain a list of Advisors who may be available to assist the Consumer with a specific question;
- (3) collecting the fees from the Consumer for the Services;
- (4) paying the selected Advisor for the Advisor's Services once the Services have been completed; and
- (5) conducting follow ups with Consumers to verify satisfaction with the manner in which the Services have been provided by the Advisor.

MyFinancialadvice does not recommend any specific Advisor to Consumers. Consumers are matched electronically with a list of Advisors who appear to have the qualifications necessary to provide advice on the topics requested by the Consumer. Consumers must evaluate and choose Advisors on their own, after reviewing the information about the Advisors disclosed or described on the MFA Website.

**b. Dedicated Advisor Listings**

MyFinancialadvice also offers Advisors the ability to create an electronic listing advertising the Services of the Advisor separately from the electronic matching system. Those listings describe the individual Advisor and the services the individual offers to Consumers. Consumers have the ability to select the particular Advisor rather than participate in the matching system. MyFinancialadvice offers two levels of dedicated listings – the standard listing and the premium listing. The premium listing allows the Advisor to include materials such as videos in addition to the standard information about the Advisor. In both situations, once a Consumer decides to use the services of a listed Advisor, the Consumer is connected to the MFA Website for the execution of contracts, regulatory disclosures and payment of fees.

**c. Program Services**

MyFinancialadvice offers tailored programs to entities such as employers, organizations or associations (Sponsors) giving them the ability to create a unique program just for their employees or members. Through these tailored programs, the Sponsor usually covers the cost of the advice and makes the advice available to its employees or members as a benefit in connection with employee benefit plans or simply as an added benefit of employment or membership.

## **2. Training and Promotional Activities**

### **a. On-Line Adviser Central**

MyFinancialadvice has established a program for providing informational blogs, training and regulatory information to investment advisers who are listed with MyFinancialadvice as well as unaffiliated advisors who want to learn more about using social media in their profession. The advisor training Website is accessed at [onlineadvisorcentral.com](http://onlineadvisorcentral.com).

### **b. Common Financial Advice**

MyFinancialadvice has also established a program for providing information to Consumers and any other members of the public with an interest in learning about financial issues and investment advisers. The Website located at: [commonfinancialadvice.com](http://commonfinancialadvice.com) provides informational blogs, training and financial information and links to Advisors who are listed with MyFinancialadvice.

## **C. Tailoring Services to Needs of Clients**

As noted above, MyFinancialadvice does not manage assets for clients and does not provide advice directly to clients; therefore, it does not tailor advice to the needs of clients. The services of MyFinancialadvice consist primarily of maintaining the Websites described above and assisting Advisors and Consumers in accessing the services available through the Websites. MyFinancialadvice structures programs for Sponsors, as described above, each of which is tailored to the needs of the specific Sponsor.

## **D. Wrap Fee Programs**

MyFinancialadvice does not offer wrap fee programs.

## **E. Assets under Management**

MyFinancialadvice does not manage assets for clients.

## **Item 5 - Fees and Compensation**

### **A. Fees Charged**

#### **1. Fees Paid by Advisors**

MFA charges the following fees to the Advisors who are included in the electronic listing service on the MFA Website:

- a.** an initial set-up fee of up to \$500 to cover the costs of verifying the Advisor's qualifications and setting up the listing on the Website;

- b. a renewal fee of \$200 for each year after the initial year to cover the costs of reviewing the Advisor's renewal listing application;
- c. an annual Software Platform License fee of \$50.00 due at the time of an Advisor's initial listing and payable annually thereafter; and
- d. a service fee of 20% to 35% of the fees collected for advice provided by the Advisor to Consumers through the Website.

## **2. Fees Charged to Consumers**

Fees for advisory services provided to Consumers through the Website are negotiated independently by the Advisor and the Consumer on a project by project basis. Once the Advisor and Consumer agree on the fee for the project, the Consumer pays the fee to MyFinancialadvice by credit card. MyFinancialadvice keeps the fee in a segregated account until the project is completed. On completion, MyFinancialadvice deducts its share of the fee from the payment and pays the balance of the fee to the Advisor.

## **3. Fees Charged to Employers and Channels**

Fees for integration with employers or channel intranets are charged on a negotiated basis to allow integration on Websites and to provide training materials to advisors selected by employers or channels to meet their advice session needs.

## **4. Negotiability of Fees**

The Listing Fee and the Service Fee may be negotiable based on one or more of the following factors:

- a. whether the Advisor brings clients to the Website or if all clients come to the Advisor through a search of the Website;
- b. the length of time an Advisor has been listed on the Website;
- c. whether the Advisor has multiple listings;
- d. whether the Advisor provides multiple services; or
- e. any other factors that MyFinancialadvice decides are reasonable under the circumstances.

Consumer fees are all negotiated between the Advisor and the Consumer. All other fees are non-negotiable.

## **B. Payment of Fees**

Fees paid by Consumers for advice are not deducted from client accounts, but are billed and collected in advance by MyFinancialadvice.



### **C. Other Fees Paid by Clients**

The fees of MyFinancialadvice are in addition to any costs an Advisor may incur itself in listing on the Website and providing advice through the Website. Consumers getting advice through the Website are responsible for implementing any advice, which may include brokerage costs or other fees, depending on the type of advice being provided.

### **D. Advance Payments and Refunds**

All fees are paid in advance. The Software Platform License fee will be refunded to any Advisor whose listing or renewal application is rejected. Fees paid by Consumers will be refunded if a project is not completed within six months from the date MyFinancialadvice collects the fee. If part of the project has been completed, MyFinancialadvice will prorate the Consumer fee based on the amount of work actually completed and will refund any unearned amounts. No other fees are refundable once they are paid.

In no event will MyFinancialadvice require payment for its services that would be more than \$1,200.00 per client and which would be paid six (6) or more months in advance.

### **E. Compensation for Sales of Securities**

Neither MyFinancialadvice nor any of its supervised persons accepts any compensation for transactions in securities for clients.

## **Item 6 - Performance-Based Fees**

MyFinancialadvice does not manage assets for clients and therefore, neither MyFinancialadvice nor any person supervised by MyFinancialadvice charges fees for management of assets that are based on a share of capital gains on, or capital appreciation of the assets of a client (*performance-based fees*). Advisors do not manage assets through the Website. All fees charged by Advisors are fixed based on the project.

## **Item 7 - Types of Clients**

Advisors listing on the Website include independent advisors, including financial planners, investment advisers, accountants, mortgage brokers and insurance professionals. The Website is open to all members of the Public and therefore Consumers include all persons who request advice.

## **Item 8 - Methods of Analysis, Investment Strategies and Risk of Loss**

### **A. Methods of Analysis and Investment Strategies**

MyFinancialadvice does not manage assets for clients and therefore it does not employ methods of analysis or investment strategies in managing assets.

### **B. Risks of Strategies Used**

MyFinancialadvice does not manage assets and therefore does not use any specific strategies.

## **C. Risks of Securities**

MyFinancialadvice does not recommend securities to Consumers.

## **Item 9 - Disciplinary Information**

Neither MyFinancialadvice nor any person having the power to exercise a controlling influence, directly or indirectly over the management of MyFinancialadvice (***Management Person***) has been involved in any material legal or disciplinary proceedings that should be evaluated by clients or prospective clients. Regulatory authorities consider the following types of matters to be material proceedings:

### **A. Criminal or Civil Actions**

Neither MyFinancialadvice nor any Management Person has been:

1. convicted of, pled guilty to, pled nolo contendere to or no contest to, any criminal action;
2. named in a criminal action that is currently pending;
3. found in any action to have violated any investment-related statute or regulation; or
4. the subject of any order, judgment or decree permanently or temporarily enjoining, or otherwise limiting, MyFinancialadvice or any Management Person from engaging in any investment-related activity, or from violating any investment-related statute, rule or order.

### **B. Administrative Proceedings**

Neither MyFinancialadvice nor any Management Person has been involved in any administrative proceeding before the U.S. Securities and Exchange Commission, any other federal regulatory agency, any state regulatory agency or any foreign financial regulatory authority in which any of such parties was:

1. found to have caused an investment-related business to lose its authorization to do business; or
2. found to have been involved in a violation of an investment-related statute or regulation and was the subject of an order by the agency or authority
  - a. denying, suspending or revoking the authorization of MyFinancialadvice or any Management Person to act in an investment-related business;
  - b. barring or suspending MyFinancialadvice or any Management Person from association with an investment-related business;

- c. otherwise significantly limiting MyFinancialadvice or any Management Person's investment-related activities; or
- d. imposing a civil money penalty of more than \$2,500 on MyFinancialadvice or any Management Person.

### **C. Action by Self Regulatory Organizations**

Neither MyFinancialadvice nor any Management Person has been involved in any proceeding before any self-regulatory organization, such as the Financial Industry Regulatory Authority, in which MyFinancialadvice or any Management Person was:

- 1. found to have caused an investment-related business to lose its authorization to do business; or
- 2. found to have been involved in a violation of the organization's rules and was: (i) barred or suspended from membership or from association with other members, or was expelled from membership; or (ii) otherwise significantly limited from investment-related activities; or (iii) fined more than \$2,500.

## **Item 10 - Other Financial Industry Activities and Affiliations**

### **A. Broker-Dealer Registration**

Neither MyFinancialadvice nor any Management Person is registered with the U.S. Securities and Exchange Commission as a broker dealer or representative of a broker-dealer.

### **B. Futures and Commodities Registration**

Neither MyFinancialadvice nor any Management Person is registered or has applied to be registered as a futures commission merchant commodity pool operator, a commodity trading advisor, or an associated person of any of those entities.

### **C. Arrangements with Related Persons**

Neither MyFinancialadvice nor any Management Person has any relationship or arrangement that is material to the Firm's advisory business or to its clients with any related person. As used in this Brochure, *related person* means any officer, director, employee, controlling person, person controlled by or under common control with the Firm.

### **D. Recommendation of Investment Advisers**

MyFinancialadvice does not recommend any specific Advisor to Consumers. Consumers are given a list of Advisors that is generated electronically based on information provided by the Consumer. The matching of Advisors to Consumers is based on the type of advice requested, the qualifications of the Advisor and the licensing or other qualifications required for the Advisor to give the advice. Consumers must evaluate and choose Advisors on their own, after reviewing the information about the Advisors matched to their requests as described on the Website.

## **Item 11 - Code of Ethics, Participation or Interest in Client Transactions and Personal Trading**

### **A. Code of Ethics**

MyFinancialadvice has adopted a Code of Ethics (*Code*) that contains policies and procedures intended to avoid conflicts of interest with clients. In addition, all Advisors are required to adhere to written Ethical Standards intended to require that Advisors act in the best interests of Consumers.

Copies of the MyFinancialadvice Code of Ethics and Ethical Standards are available upon request to the persons listed on the cover of this Brochure.

### **B. Conflicts in Transactions in Securities**

MyFinancialadvice does not manage assets for clients and therefore, neither the Firm nor any related person recommends securities, buys securities or sells securities for clients, in which either the Firm or any related person has a material financial interest.

### **C. Conflicts in Investments in Securities**

Neither MyFinancialadvice nor any related person invests in securities (or related securities) that the Firm or a related person recommends to clients.

### **D. Conflicts in Contemporaneous Transactions**

Neither MyFinancialadvice nor any related person recommends securities to clients, or buys or sells securities from client accounts at the same time that the person purchases or sells securities for their own account.

## **Item 12 - Brokerage Practices**

MyFinancialadvice does not manage assets for clients and therefore it does not direct any transactions to broker-dealers. None of the issues related to brokerage apply to the Firm or any related person.

## **Item 13 - Review of Accounts**

MyFinancialadvice does not manage assets for clients and therefore it does not review client accounts.

## **Item 14 - Client Referrals and Other Compensation**

### **A. Economic Benefits for Providing Advice**

No third party who is not an Advisor or Consumer provides any economic benefit to MyFinancialadvice for services provided by MyFinancialadvice through the Website.

## **B. Payment for Referrals**

MyFinancialadvice charges fees for the electronic listing services it provides by keeping a portion of the fees earned by the Advisors who provide advice through the Websites. Under some regulatory interpretations, the receipt of those fees in connection with the listing services provided by MyFinancialadvice may be considered soliciting by MyFinancialadvice for the Advisors listed on the Websites.

MyFinancialadvice may charge discounted fees to Advisors who bring their own clients to the MFA Website for Services. This practice can be considered payment for referrals by MyFinancialadvice.

MyFinancialadvice may enter into agreements with third parties, including broker-dealers, custodians and other providers of financial services, which would allow MyFinancialadvice to include a link to its Website from the websites of those third parties. Those agreements may authorize MyFinancialadvice to compensate the sponsors of those sites by paying them fees that are based on the amounts MyFinancialadvice earns from Consumers who access the Program through those links.

MyFinancialadvice may pay a percentage of its fees to third parties who sponsor the Website or who provide advertising space for the MyFinancialadvice Services or who allow links to the Website from their websites.

## **Item 15 - Custody**

MyFinancialadvice does not have custody of any client assets or securities; however, as described in Item 5, above, MyFinancialadvice holds fees paid by Consumers in advance.

## **Item 16 - Investment Discretion**

MyFinancialadvice does not accept discretionary authority over any client assets.

## **Item 17 - Voting Client Securities**

Because MyFinancialadvice does not maintain custody or control of client assets, it does not receive and therefore does not vote Proxies for customer securities.

## **Item 18 - Financial Information**

MyFinancialadvice is not required to provide financial statements.

## **A. Prepayment of Fees**

MyFinancialadvice does not require prepayment of more than \$1,200 in fees per client, more than six months in advance.

**B. Discretionary Authority/Custody**

MyFinancialadvice does not have discretionary authority over, or custody of client funds and does not accept more than \$1,200 in fees per client, more than six (6) months in advance.

**C. Bankruptcy**

MyFinancialadvice has not been subject to a bankruptcy petition at any time during the past ten years.