



**Firm Brochure**  
Form ADV, Part 2A

**Item 1 – Cover Page**

**Smart401k, LLC**

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**Overland Park, KS 66210**  
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**[www.smart401k.com](http://www.smart401k.com)**

This “Brochure” provides information about the qualifications and business practices of Smart401k, LLC [“Smart401k”]. If you have any questions about the contents of this Brochure, please contact us at 877-627-8401. 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.

Additional information about Smart401k, LLC also is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

Note: While Smart401k may refer to itself as a “registered investment adviser” or “RIA”, clients should be aware that registration itself does not imply any level of skill or training.

March 2018

## ***ITEM 2 – MATERIAL CHANGES***

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### **Annual Update**

The Material Changes section of this brochure is updated annually to report any material changes to the previous version of Form ADV, Part 2A (the Firm Brochure). The section below provides a summary of material changes since the last update.

### **Material changes since the last update:**

Investment advisers must update the information in their Form ADV, Part 2A, when a material change has occurred. Smart 401k, LLC is updating its Form ADV, Part 2A, dated March 2018 to report the following:

- I. No material changes.

The revised Form ADV, Part 2A, for Smart401k is dated March 2018.

### **Full Brochure Available**

Whenever you would like to receive a copy of our Form ADV, Part 2, please contact us by telephone at 877-627-8401.

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#### ***ITEM 4 – ADVISORY BUSINESS***

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Smart401k, LLC is an SEC registered investment adviser, offering asset management and investment advisory services. Smart401k, LLC commenced operation and became an SEC registered investment adviser in 2003.

Financial Engines, Inc. (“Financial Engines” or “FEI”), through its subsidiaries, wholly owns Smart401k, LLC. Financial Engines, Inc. is a publicly traded company (symbol “FNGN”).

#### **Independent Participant Investment Advice**

Smart401k, LLC (“Smart401k”) provides investment advice to retirement plan participants (“Advice Clients”) to assist Advice Clients to select an appropriate mix of investments that are made available to them through their employer-sponsored retirement plan (“Plan”). Smart401k offers its Advice Clients the ability to provide information about investment time horizon, individual risk tolerance and investment goals through the Smart401k questionnaire that is made available in hardcopy form or through a website. In certain circumstances, Smart401k may have an arrangement with the Plan to provide independent investment advice to the Plan (“Independent Plan Investment Advice”) and/or Plan participants. Where no such arrangement exists, Advice Clients may be required to supply information regarding the investment options that are available through the Plan, including mutual fund and/or brokerage windows. Smart401k will analyze the information supplied by the Advice Client and will generate customized investment recommendations for the Advice Client to implement to achieve a well-diversified portfolio through the investment options available under the Plan. The investment advice may include recommendations to invest in specific funds or to invest in a preexisting model or managed portfolio made available through the Plan. Advice Clients are provided instructions to implement – if the Advice Client so chooses – the elements of the action plan. Smart401k asks its Advice Clients to review their accounts, through the Smart401k website, to review their asset allocation and/or obtain a new recommendation. It is the sole responsibility of Advice Clients to update their accounts and address any personal circumstances that may have changed, and Smart401k will not render any advice or have any responsibility for investments held outside of the Plan.

Smart401k is an independent Investment Adviser and does not receive any compensation from those who provide or manage investments that are available through the Plan. Smart401k charges clients a flat fee. As such, Smart401k has no incentive to direct an Advice Client to invest in one investment option over another. Advice Clients are free to arrange for investment advice from an advisor that has no affiliation with the Plan.

Any advice delivered by Smart401k to an Advice Client will be non-discretionary, and the Advice Client must affirmatively elect to implement the recommendations through the Plan’s recordkeeper or administrator. Any decision to purchase, sell or hold an investment must be made solely at the direction of the Advice Client. The investment advice provided to an Advice Client is based on the information supplied by the Advice Client (and, if applicable, information supplied by the Plan) and the market and economic conditions prevailing (or reasonably believed to occur) at the specific time that the investment advice is provided to the Advice Client. In rendering Independent Participant Investment Advice to Advice Clients, Smart401k is a fiduciary under the Employee

Retirement Income Security Act of 1974 (“ERISA”) and the Investment Advisers Act of 1940 (the “Act”) and will act solely in the best interest of its Advice Clients.

#### **Independent Plan Investment Advice**

The Plan fiduciary is solely responsible for the selection of the investment platform, recordkeeping and other services for the Plan. Smart401k does not assist the Plan fiduciary in selecting and monitoring investment options to be made available to Plan participants. Instead, once the Plan selects available options for clients, upon request Smart401k will use proprietary and third-party research tools to formulate recommendations for the Advice Clients’ consideration. It is always up to each Advice client whether to proceed with accepting that advice, and Smart 401k will not do so on their behalf. Smart401k will act as a fiduciary under the Act and section 3(21)(A)(ii) of ERISA; the Plan fiduciary will retain sole discretion and responsibility as to investment options available in the plan.

#### **Independent Portfolio Allocation**

Smart401k will use the investment options selected by the Plan fiduciary or a delegate thereof to construct a possible portfolio allocation. The portfolio allocations will seek to achieve varying degrees of long-term appreciation and capital preservation, based on client inputs, through a mix of equity and fixed income exposures offered as investment options under the Plan. Smart401k will not include company stock in its recommendations and will have no responsibility or liability for such investments if the Advice Client chooses to follow such recommendations. Smart401k is a fiduciary under the Act and ERISA and will act solely in the best interest of the Plan’s participants and beneficiaries. As is noted above, Smart401k, has no obligation, fiduciary or otherwise, to select and monitor the individual investment options made available under the Plan.

#### **Sub-Advisory Services**

In addition to providing investment advisory and related services under arrangements with plan sponsors, Smart401k may also have arrangements with financial institutions to provide similar services on a sub-advisory basis. Smart401k may provide portfolio allocation recommendations and services to firms. In these cases, the financial institution is responsible for delivering the advice to its clients through its personnel and technology.

### ***ITEM 5 – FEES AND COMPENSATION***

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Smart401k charges a flat-dollar fee for providing the above-referenced services. Such fees will not vary depending upon the basis of any investment option selected.

#### **Independent Participant Investment Advice**

In certain circumstances, the company that offers or sponsors a retirement plan (“Plan”) may decide to pay Smart401k’s fees on behalf of Advice Clients as a benefit for the employee. If Smart401k

services are funded by the company, flat-dollar fees are typically charged. Fees are negotiable on a provider by provider basis.

If the Smart401k service is paid for by Advice Clients, they must pay when registering for the service on the Smart401k website. Generally, the standard pricing is \$59 per quarter (every 3 months), or \$199.95 per year, payable in advance. This pricing can be reduced through a group discount to companies that allow the marketing of Smart401k to their employees. The typical discount lowers the price per individual to \$45 per quarter, or \$149.95 per year.

### **Sub-Advisory Services**

Smart401k may offer advisory services to clients of certain financial institutions on a sub-advisory basis. In such cases, Smart401k collects the advisory fees directly from the relevant financial institution. The amount of the fee and the ability to obtain refunds or terminate an agreement before its expiration is subject to negotiation between Smart401k and the financial institution. Smart401k charges a fixed fee for these services. The fixed fee is paid on a quarterly basis in arrears.

Smart401k is an independent Investment Adviser registered with the Securities and Exchange Commission. As an independent Investment Adviser, Smart401k does not receive any fees or other compensation, directly or indirectly, from any person or persons (or anyone affiliated with such persons) that market, sell, manage or provide investments in which plan assets of any individual account plan are invested. The only compensation received by Smart401k are the fees set forth above. Smart401k does not participate in any revenue sharing with investment providers to the Plan or receive any “special” compensation above-and-beyond the fees it charges for the above-referenced services.

### **Service Pricing Promotions and Discounts**

Smart401k may offer discounts and/or promotional pricing on any of the services noted above to select clients. Smart401k may also offer free trial periods, at its sole discretion, to select prospective clients.

### **Other Fees and Expenses**

In addition to the fees charged by Smart401k, investment options recommended for a participant and/or plan may also bear a variety of expenses, including, but not limited to, investment management, accounting, legal, administrative and distribution expenses. Please refer to the prospectus or other offering documents for each investment offered in your particular plan for more information regarding fees and expenses. Such fees are not charged by, or shared with, Smart401k.

### **Potential Conflicts of Interest**

As explained in above, fees assessed for the use of Smart401k services might be paid in certain circumstances by the Plan sponsor, the Plan, Plan participants or by a service provider to the Plan. In such situations, the Plan sponsor or service provider paying that fee might seek to reduce its costs by either limiting the services available through Smart401k or otherwise. There might be situations in which a Plan service provider pays, from a portion of the amount they earn for the services provided to the Plan, our service fee. There could be incentives for such providers to seek to increase the number or amount of Plan transactions. To mitigate any potential conflict of interest

that may arise where the fees charged by Smart401k are paid by a third-party, Smart401k will base its recommendations solely on the criteria provided by the Plan fiduciary (either directly or through the IPS) or the Advice Client.

Smart401k may be deemed to be under common control (as defined by the SEC) and have relationships with other firms that provide services to investors and/or retirement plans. Financial Engines may permit us to use their name on our website and in marketing materials. In addition, Financial Engines makes available to us certain – but not all -- of their proprietary research tools. Financial Engines Advisors L.L.C. (FEA), however, is under no obligation to provide any investment advice, guidance, research or other service to us or any of our Clients. Any investment advisory relationship with our clients is strictly between us and such client.

#### **Service Termination Provisions and Refunds of Fees Paid to Smart401k**

Clients may terminate their relationship with Smart401k at any time upon written or email notice. Clients may also cancel their service as-of the end of their respective service periods by contacting a Smart401k advisor by telephone or by logging in to their Smart401k accounts. Any client wishing to cancel a service as-of a date prior to the end of the previously selected service period, and wishing to receive a refund, to the extent applicable, for any unused portion of that service period, must cancel by written or email notice. As is noted above, to the extent fees are being paid by third parties, including but not limited to the Plan, termination provisions and refund availability may differ.

A client terminating the relationship by submitting a written or email notice during the first 30 days of service will be entitled to a full refund, unless the client requests to continue service through the end of the initial service period. After the first 30 days of service, cancellations will be processed as-of the end of the service quarter in which the cancellation request is received. As-of the end of the quarter in which the cancellation request is received, the client will be deactivated from the Smart401k website and will no longer receive advisory or portfolio allocation services. For written and email cancellation requests submitted after the first thirty days of service, a client will be refunded for unused quarters, where applicable, based on their original method of payment.

For a client utilizing a free trial period, the paid subscription service automatically begins once the free trial period has ended. However, a client utilizing a free trial may cancel the service prior to the conclusion of the trial period through the normal cancellation methods noted above. Once the free trial period has ended, the subscription period will begin as-of the first day after the trial period has ended and any cancellations or refunds will be subject to the provisions noted in the preceding two paragraphs above.

#### ***ITEM 6 – PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT***

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Smart401k does not receive performance based fees.

#### ***ITEM 7 – TYPES OF CLIENTS***

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Smart401k's clients generally consist of Plan sponsors, Plan participants and individual customers wishing to obtain advice regarding their employer sponsored retirement plans.

## *ITEM 8 – METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS*

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Smart401k provides non-discretionary investment advice relating to investment allocations to funds offered through company-sponsored retirement plans. Smart401k does not offer advice with respect to company stock (“Company Stock”) or any other individual company security except that Smart401k generally recommends that Clients allocate no more than ten percent (10%) of the investable assets of their portfolios to Company Stock.

Smart401k’s methodology is designed to create asset allocation recommendations that match clients’ Investor Profiles. Asset allocation models are provided by an affiliate of Smart401k, Financial Engines Advisors L.L.C. (FEA), an SEC registered investment adviser. FEA provides templates of various asset allocation models for use by Smart401k Advisors. These templates include a range of asset allocation models from the most conservative to the most aggressive.

Smart401k is responsible for evaluating and determining the proper asset allocation for a particular client and recommending an investment strategy for that client. Client Investor Profiles are based on clients’ answers to a standardized questionnaire, which is designed to measure clients’ investment time horizons, risk tolerances and investment goals. Asset allocation refers to the manner in which funds are allocated among various asset classes, such as International Stock Funds, Small/Mid-cap Stock Funds, Large-cap Stock Funds, Bond Funds and Short-term Fixed Income, and other asset categories. Based upon each client’s answers to the questionnaire, Smart401k chooses an asset allocation model. The actual decision of whether to implement some, all or none of the recommendations is made by each client; to the extent they follow any such recommendations, they do so on their own.

To determine what Smart401k believes is an optimal mix for each client, Smart401k uses the concepts of Modern Portfolio Theory and the Efficient Frontier.

- **Modern Portfolio Theory** – The theory, first published in the 1950s, formalizes and advocates the practice of diversifying across a variety of investment types. The chief benefit of diversification is a reduction in portfolio risk – diversification is the opposite of putting all your eggs in one basket.
- **The Efficient Frontier** – An element of Modern Portfolio Theory, financial analysts use this equation to determine which funds that have the highest expected return for a specific level of investment risk.

Once an asset allocation model is chosen for a client, Smart401k uses a proprietary fund selection methodology to determine what it believes to be the best available fund in each asset category.

Factors that are considered include, but are not necessarily limited to, the following:

- The fund manager's track record;
- Consistency of performance across multiple time periods;
- Performance of the fund against others in the same category;
- Risk factors;
- Expenses;



- The overall ethics and stewardship of the fund family; and
- Potentially other factors.

Smart401k acquires plan-level Fund offerings and certain other information from plan participants, plan sponsors, and potentially other sources. Performance, expense and other data relating to specific funds is generally obtained through third-party databases, including Morningstar and Lipper, and may be obtained through other sources.

### **Risks and Other Limitations**

Investing in mutual funds and other investments involves risk, including the risk of a loss of principal investments. There is no guarantee that Smart401k's investment methodology will result in a positive investment return for any client portfolio if Smart401k's recommendations are implemented.

Similarly, references to Modern Portfolio Theory and Efficient Frontier concepts should not be construed as any guarantee of efficiency in expected returns as compared to portfolio risks. Smart401k applies a variety of criteria in choosing funds for each asset class, including historical returns, fee ratios, management tenure and several other criteria, the application of which may cause a recommended portfolio to be theoretically less efficient than it may have been had other fund recommendations been made. Additionally, Smart401k's ability to match funds to asset classes for any given plan is limited, potentially significantly, due to limitations in the number and/or types of funds offered in any particular plan.

Portfolio recommendations provided by Smart401k to a participant of a particular 401k plan do not take into account investments and other assets held by the participant outside of that plan. If you have significant fund and/or individual securities investment outside of this 401k plan, we strongly urge you to speak to a qualified investment professional prior to implementing any allocation recommendations provided by Smart401k. Additionally, because Smart401k is reliant upon participants and other parties to provide updated plan information, recommendations made by Smart401k may not always capture or include changes to a roster of funds offered in a given plan if those changes were not communicated to Smart401k.

### ***ITEM 9 – DISCIPLINARY INFORMATION***

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Smart401k does not have any disciplinary information to disclose.

### ***ITEM 10 – OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS***

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Smart401k is wholly owned by Financial Engines, Inc. Through its common ownership under Financial Engines, Inc., Smart401k does have material business relationships and arrangements with other investment advisers which are affiliated or related entities, as well as affiliated or related entities which are not investment advisers, which clients should know and broadly understand. Smart401k and its staff do not have any material business relationships or arrangements with unaffiliated or unrelated third parties.

Financial Engines, Inc. also owns FEA. Financial Engines Advisors primarily offers advisory and related services to participants in employer-sponsored defined contribution plans for their plan accounts and for retirement accounts outside the plans. FEA offers services for employees' workplace retirement accounts through an agreement between FEA and the plan and/or the sponsoring employer. FEA also has arrangements with financial institutions to provide similar services on a sub-advisory basis. FEA provides other investment-related services, including guidance and investment education. FEA operates advisor centers throughout the nation which provide their clients with mutual fund and/or exchange-traded fund(s) and asset allocation recommendations.

Financial Engines may permit Smart401k to use their name on our website and in marketing materials. In addition, Financial Engines makes available to us certain – but not all -- of their proprietary research tools. Financial Engines Advisors, however, is under no obligation to provide any investment advice, guidance, research or other service to us or any of our Clients. Any investment advisory relationship with our clients is strictly between us and such client.

An agreement for investment advice exists between Smart401k and FEA. Termination of that agreement could limit the ability of Smart401k to access new asset allocation recommendations provided by Financial Engines. Smart401k does not anticipate any future events occurring which would result in termination of the agreements, as both entities share common ownership. Upon request, Smart401k will provide a listing of occurrences that could result in the termination of either of these agreements.

Through its common ownership under Financial Engines, Inc., Smart401k is also affiliated with TMFS Insurance Agency, LLC. TMFS Insurance Agency, LLC provides clients term life insurance solutions. Insurance is offered in states where the agency is licensed to offer insurance.

## ***ITEM 11 – CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS***

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Individuals associated with Smart401k may buy or sell securities identical to those mutual fund investments or securities which may be offered as investment options in any of Smart401k's advice or portfolio allocation clients' company-sponsored retirement plans. Smart401k has adopted a Code of Conduct pursuant to 204A-1 of the Investment Advisers Act of 1940 (the "Code"). Smart401k's Code specifies that all employees, officers, and directors of Smart401k ("Employees") are expected to conduct business according to high standards of honesty and fairness and to render that service to its customers, which, in the same circumstances, it would apply to or demand for itself. Employees are also expected to provide competent customer focused sales and service; to engage in active and fair competition; to provide advertising and sales materials that are clear as to purpose and honest and fair as to content; to provide for fair and expeditious handling of customer complaints and disputes; and to maintain a system of supervision that is designed to achieve compliance with the rules and regulations of its industry.

## ***ITEM 12 – BROKERAGE PRACTICES***

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Smart401k does not recommend or direct any brokerage services.

## ***ITEM 13 – REVIEW OF ACCOUNTS***

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For the Independent Participant Investment Advice Service, Smart401k offers customized investment recommendations to retirement plan participants. As part of this advice service, Smart401k does not monitor the Advice Client's retirement plan accounts. Smart401k provides a customized investment recommendation to its Advice Clients, which is available for review by the Advice Client via the internet, before the Advice Client determines whether to implement the recommendation. Smart401k asks that participants review their accounts quarterly to address and review their asset allocation through the Smart401k website and obtain a new recommendation as the Advice Client wants or as the Advice Client determines is appropriate. It is the sole responsibility of the Advice Clients to update their accounts and address any personal circumstances that may have changed.

## ***ITEM 14 – CLIENT REFERRALS AND OTHER COMPENSATION***

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Smart401k is wholly owned by Financial Engines, Inc. which also owns Financial Engines Advisors L.L.C. Advisors of Smart401k may, on occasion, refer a prospect or client to an advisor of FEA.

Smart401k may compensate, either directly or indirectly, a number of third-party institutions or any person for referrals. Smart401k may also compensate an affiliated organization for referrals. Compensation for client referrals is generally paid out of client fees paid to Smart401k, but generally will not result in a higher fee charged to clients than would otherwise be the case.

Each client for which Smart401k pays a referral fee should receive, and agree to, disclosures setting forth the nature of activities conducted by the referral agent, the nature of the fees paid by Smart401k, whether Smart401k is affiliated with the referral agent and whether the Client pays a fee higher than that which the Client would have paid otherwise.

## ***ITEM 15 – CUSTODY***

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Smart401k does not maintain custody of any client funds or securities.

## ***ITEM 16 – INVESTMENT DISCRETION***

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Smart401k does not have discretionary authority over client's assets.

## ***ITEM 17 – VOTING CLIENT SECURITIES***

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At this time Smart401k does not vote proxies on behalf of clients.

***ITEM 18 – FINANCIAL INFORMATION***

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Smart401k does not have any financial condition that is likely to impair its ability to their contractual commitments to their clients.

***ITEM 19 – REQUIREMENTS FOR STATE-REGISTERED ADVISERS***

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Not applicable



**Brochure Supplement**  
Form ADV, Part 2B

**Smart401k, LLC**

**Joelle R. Morris, CRPC®**  
**Michael Choate**  
**Michael Tracy, CRPC®**

**10950 Grandview Drive, Suite 500**  
**Overland Park, KS 66210**  
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This Brochure Supplement provides information about the investment advisor representatives at Smart401k, LLC ["Smart 401k"] and supplements its Brochure (Part 2A of Form ADV). You should have received a copy of that Brochure. Please contact Smart401k at the above address, or by telephone, if you did not receive the Brochure or if you have any questions about the contents of this supplement.

Smart401k, LLC is a registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser.

Additional information about Smart401k, LLC also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

March 2018

**This Brochure Supplement includes information on the following items:**

Educational Background and Business Experience

Disciplinary Information

Other Business Activities

Additional Compensation

Supervision

## ***JOELLE R. MORRIS, CRPC®***

### ***EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE***

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#### **Year of Birth:**

1978

#### **Formal Education After High School:**

- University of Kansas. Bachelor of Science in Journalism; 2000

#### **Business Background:**

- 08/2014- Present: Smart401k, LLC. Investment Advisor
- 04/2012-08/2014: TMFS Advisors, LLC. Client Services Manager
- 08/2007-04/2012: JP Morgan Retirement Plan Services, LLC. Participant Services Representative

#### **Professional Designations:**

Chartered Retirement Planning Counselor<sup>SM</sup> (CRPC®)

CRPC® coursework and program is a collaborative effort by the College for Financial Planning® and the Investment Company Institute.

Individuals who hold the CRPC® designation have completed a course of study encompassing pre- and post-retirement needs, asset management, estate planning and the entire retirement planning process using models and techniques from real client situations. The program is designed for approximately 120-150 hours of self-study. The program is self-paced and must be completed within one year from enrollment.

#### **Qualifications and Licenses:**

Joelle R. Morris has successfully completed the Series 65 (Uniform Investment Adviser Law) examination, which permits her to qualify as an investment advisor representative, and register with states where she may provide advisory services and which require registration.

### ***DISCIPLINARY INFORMATION***

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Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. Joelle R. Morris does not have any disclosures.

### ***OTHER BUSINESS ACTIVITIES***

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Registered investment advisers are required to disclose any outside business activities. Joelle R. Morris is not involved in any outside business activity.

#### *ADDITIONAL COMPENSATION*

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Registered investment advisers are required to disclose additional compensation. Joelle R. Morris does not receive any additional compensation or economic benefit for investment advisory services, other than her compensation from Smart401k.

#### *SUPERVISION*

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Joelle R. Morris is supervised by Joshua Castro who can be reached at 602-553-7170.



## *MICHAEL CHOATE*

### *EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE*

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#### **Year of Birth:**

1980

#### **Formal Education After High School:**

- Baker University, B.S. Business; 2009

#### **Business Background:**

- 08/2015- Present: Smart401k, LLC. Investment Advisor
- 05/2008-07/2015: The Mutual Fund Store, LLC. Client Account Services Representative
- 08/2004-04/2008: The Hartford. Contract Specialist

#### **Professional Designations:**

#### **Qualifications and Licenses:**

Michael Choate has successfully completed the Series 65 (Uniform Investment Adviser Law) examination, which permits him to qualify as an investment advisor representative, and register with states where he may provide advisory services and which require registration.

### *DISCIPLINARY INFORMATION*

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Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. Michael Choate does not have any legal or disciplinary disclosures.

### *OTHER BUSINESS ACTIVITIES*

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Registered investment advisers are required to disclose any outside business activities. Michael Choate is not involved in any outside business activity.

### *ADDITIONAL COMPENSATION*

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Registered investment advisers are required to disclose additional compensation. Michael Choate does not receive any additional compensation or economic benefit for investment advisory services, other than his compensation from Smart401k.

### *SUPERVISION*

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Michael Choate is supervised by Joshua Castro who can be reached at 602-553-7170.

## ***MICHAEL TRACY, CRPC®***

### ***EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE***

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#### **Year of Birth:**

1991

#### **Formal Education After High School:**

- Northwest Missouri State University, B.S. Financial Management; 2014

#### **Business Background:**

- 09/2015- Present: Smart401k, LLC. Investment Advisor
- 08/2014-08/2015: State Street Bank. Client Operations Specialist
- 08/2010-05/2014: Northwest Missouri State University. Student

#### **Professional Designations:**

Chartered Retirement Planning Counselor<sup>SM</sup> (CRPC®)

CRPC® coursework and program is a collaborative effort by the College for Financial Planning® and the Investment Company Institute.

Individuals who hold the CRPC® designation have completed a course of study encompassing pre- and post-retirement needs, asset management, estate planning and the entire retirement planning process using models and techniques from real client situations. The program is designed for approximately 120-150 hours of self-study. The program is self-paced and must be completed within one year from enrollment.

#### **Qualifications and Licenses:**

Michael Tracy has successfully completed the Series 65 (Uniform Investment Adviser Law) examination, which permits him to qualify as an investment advisor representative, and register with states where he may provide advisory services and which require registration.

### ***DISCIPLINARY INFORMATION***

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Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. Michael Tracy does not have any legal or disciplinary disclosures.

### ***OTHER BUSINESS ACTIVITIES***

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Registered investment advisers are required to disclose any outside business activities. Michael Tracy is not involved in any outside business activity.

### *ADDITIONAL COMPENSATION*

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Registered investment advisers are required to disclose additional compensation. Michael Tracy does not receive any additional compensation or economic benefit for investment advisory services, other than his compensation from Smart401k.

### *SUPERVISION*

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Michael Tracy is supervised by Joshua Castro who can be reached at 602-553-7170.