



Hundredfold Advisors, LLC

Part 2A for Form ADV: Firm Brochure

Revision 3/24/2011

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This brochure provides information about the qualifications and business practices of Hundredfold Advisors, LLC - (HFA). If you have any questions about the contents of this brochure, please contact us at 757-463-7797 or mcollins@hundredfoldadvisors.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.

Additional information about Hundredfold Advisors, LLC also is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 – Material Changes

This Brochure dated March 24, 2011 is a new document prepared according to the SEC’s new requirements and rules. In the future, this Item will discuss only specific material changes that are made to the Brochure and provide clients with a summary of such changes.

Currently, our Brochure may be requested by contacting us at (757) 463-7797.

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Item 4 – Advisory Business

A-C - The applicant will provide sub-advisory portfolio management services to a specific number of mutual funds diversified into 3 types of funds – High Yield, International & US Equity. The objective of applicant for these funds will be to achieve consistent rates of return that are in excess of a non-active managed strategy. The applicant strives to avoid participating in declining markets and will strive to participate in rising markets. The applicant will consider the overall risk of the holdings of the portfolio and will affect portfolio protection techniques to preserve the purchasing power of the assets. The primary advisor of the funds will handle the trading of securities.

D – N/A

E-Assets under management FYE 12-31-2010

Discretionary Amount	\$ 114,809,565
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Discretionary Accounts	3
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Item 5 – Fees and Compensation

A-E - The fee schedule for sub-advisory services is based on a percentage of assets within the fund being managed and is paid from the primary advisors' management fee obtained from the fund. As stated in the fund prospectus, the primary advisors' fee from portfolio management is 1%. Fees are paid to the applicant monthly in arrears. The sub-advisory agreement between applicant and primary advisor is renewable annually with 60-day notice of non-renewal. Termination can be done with a 90-day notice. The primary advisor will pay the fees received for this service under a sub-advisory agreement. This agreement will not affect the fees charged to investors within the mutual funds.

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

HFA does not charge any performance based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

Item 7 – Types of Clients

HFA is in a sub-advisory role to three mutual funds only.

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

HFA obtains analytical data from many sources including daily monitoring of prices of stocks, bonds, oil, US dollar, gold and many other investments to determine low risk entry and exit points for mutual funds. Information is collected and assimilated from various computer databases, newspapers, magazines, newsletters and research materials by the manager to develop different management strategies. Other factors considered in analysis include continuous monitoring of mutual fund performance and relative strength, technical and fundamental analysis, market sentiment, and access to other leading professional investment advisors. Reviews of investment strategies are done on a daily basis based on the analysis and information gathered as explained above. Monthly fact sheets for each fund are produced with monthly, quarterly, YTD, 12-month, 5-year, and inception data. A brief portfolio update is produced monthly identifying the portfolio allocation. It is recommended investors read the fund prospectus for risk of loss issues.

Item 9 – Disciplinary Information

HFA has no information applicable to disciplinary information events material to a client or prospective client's evaluation of its advisory business. HFA has established policy and procedures to comply with SEC rules and regulations. The Policy and Procedures manual is reviewed on an annual basis by the compliance officer.

Item 10 – Other Financial Industry Activities and Affiliations

The applicant's managers are officers of Spectrum Financial, Inc. (SFI) a federally registered investment advisor. SFI provides an AssetMaxx investment program, which recommends, to its clients, funds sub-advised

by the applicant. The fees received from this service are paid directly from the mutual fund company as servicing fees. The applicant will not participate in these fees.

SFI provides back office services to the applicant. These back office services are donated due to the 100% ownership of HFA by Simple Distribute Charitable Foundation, a public charity.

Ralph Doudera (managing member) donates his services to the applicant. The donation of services arrangement is consistent with the ownership of the applicant being a Charitable Foundation. All profits generated by the applicant are donated directly to charity.

Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading (A-D)

Code of Ethics – The applicant requires all employees/access persons to adhere to the Code of Ethics adopted by the applicant. This document outlines policy and procedures to avoid conflicts of interest and places the interest of clients first. Violations are handled by disciplinary actions.

Privacy Notice - The applicant's policy is to protect personal client information. The applicant does not sell or maintain lists for any outside nonaffiliated marketing firms.

Item 12 – Brokerage Practices

HFA does not recommend or direct to brokerage firms. This is a function of the primary advisor of the fund.

Item 13 – Review of Accounts (A-C)

Strategies are reviewed on a daily basis using charting, fundamental, technical, cyclical analysis. The use of external newsletters, periodicals, and databases are also incorporated. This information triggers the buy/sell signals for all strategies. (Additional information explained in #8 above).

Item 14 – Client Referrals and Other Compensation

N/A

Item 15 – Custody

HFA does not have custody of assets.

Item 16 – Investment Discretion

HFA has complete discretion on the type of securities bought and the percentage allocated within the portfolio, however, all purchases/sales must comply with the investment guidelines in the mutual fund prospectus.

Item 17 – Voting Client Securities

Proxy Voting – HFA does not provide services for proxy voting to its clients. All proxies are sent directly to the primary advisor.

Item 18 – Financial Information

N/A