

Part 2A of Form ADV: Firm Brochure

Item 1 Cover Page



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This brochure provides information about the qualifications and business practices of Fiduciary Experts LLC. If you have any questions about the contents of this brochure, please contact us at 888-544-401k or 619-819-8604. 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 Fiduciary Experts LLC is also available on the SEC's website at www.adviserinfo.sec.gov. Registration does not imply a certain level of skill or training.



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Item 2 Material Changes

There are no material changes.

Item 4 Advisory Business

A. Fiduciary Experts LLC was formed in February 2008 by Maribel Larios. Maribel has over thirteen years of investment advisory experience and has been in the 401k, 403b, 457 retirement plan business for over eleven years. She is the principal of this RIA.

B. As a Registered Investment Advisor we specialize in the retirement industry as consultants, fiduciaries, and investment managers for company and government retirement plans.

As an RIA our service model provides corporate, Non-Profits, and municipal retirement plans an independent fiduciary best practice process. We provide co-fiduciary and discretionary fiduciary services for the investment liability of these retirement plan by implementing a set process, specific criteria, quarterly investment monitoring. Our services include the following but are not limited as we also take on special cases as it pertains to fiduciary services:

- 1- Formalize 401k oversight and process
- 2- Create/update Charter for proper delegation of plan management
- 3- Educate and identify current company fiduciaries and set up Investment Committee.
- 4- Create/Update IPS (Investment Policy Statement) with qualitative and quantitative criteria for proper investment selection.
- 5- Provide cost analysis and benchmarking on 401k vendors
- 6- Renegotiate and recover excesses discovered to confirm such plan costs are reasonable.
- 7- Education and enrollment for plan participants.
- 8- One-on-one advisory service to participants
- 9- RFP and plan transition consulting and execution
- 10- Fiduciary overview and education to plan sponsors.

We work with the plan administrators, TPA firms, and brokers in order to orchestrate a transparent system which ultimately helps lower client liability and execute procedures as ERISA mandates.

We specialize on cost recovery solutions to the 401k, 403b, 457, and Profit Sharing Retirement Plans. As an ERISA co-fiduciary or 3(38) advisor we address and provide solutions to the issues affecting the financial markets such as the liabilities fiduciaries handle, and we provide effective and transparent cost controls.

C. We tailor our service model to 401k, 457, and 403b plans as well as individuals. Individual clients may impose restrictions on investing in certain securities if they wish and such restrictions will be incorporated into their specific IPS. Institutional clients may also impose such restrictions so as long as these do not create a conflict in offering the necessary asset classes to participants to avoid any breaches of fiduciary duties.

Item 4 Advisory Business

C. Fiduciary Experts LLC was formed in February 2008 by Maribel Larios. Maribel has over fifteen years of investment advisory experience and has been in the 401k, 403b, 457 retirement plan business for over thirteen years. She is the principal of this RIA.

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- 15- Provide cost analysis and benchmarking on 401k vendors
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D. We do NOT participate in any wrap programs.

E. As of July 2016, we manage over \$300,000,000 in assets as retirement plan consultants. About 10% of assets are managed under our discretionary model. 90% is managed on a non-discretionary basis as co-fiduciaries of such plans.

In order to avoid conflicts of interest and full transparency, we do not act as custodian for plans for assets under management. These assets are calculated by amounts in our client retirement plans held by plan administrators/record keepers and custodians.

Item 5 Fees and Compensation

All fees are negotiable. Below is a general fee schedule as all services are customized in order to meet our client's needs.

FIDUCIARY EXPERTS LLC Adviser Disclosures

The following important disclosures follow:

- Acceptance of Fiduciary Responsibility
- Adviser Affiliations
- 408 (b)(2) Fee Disclosures

Acceptance of Fiduciary Responsibility

Fiduciary Experts LLC, understands and agree to act as a fiduciary and accept the personal responsibility for the advice we provide our my clients. As a fiduciary, I will act in the best interest of these clients.

The advice I provide as a fiduciary will be based on my best judgment of what a prudent person would do under the same circumstances. As a fiduciary I am not responsible for the financial results that are achieved or not achieved, provided that I can document the prudent process used to arrive at advice I give.

As a fiduciary, our advice will be consistent with the principles of diversification so as to minimize the risk of large losses, unless under the circumstances it is shown to be imprudent to diversify.

The advice we provide as a fiduciary will be in accordance with any documents or other instruments governing the client and consistent with existing laws and regulations.

Fee Schedules

B. Describe whether you deduct fees from clients' assets or bill clients for fees incurred. If clients may select either method, disclose this fact. Explain how often you bill clients or deduct your fees.

Investment Management for Individual Accounts (not institutional clients):

Tier 1	90 bp on first	1,000,000 \$
Tier 2	40 bp on next	9,000,000 \$
Tier 3	30 bp on next	15,000,000 \$
Tier 4	25 bp on next	15,000,000 \$
Tier 5	20 bp on next	75,000,000 \$
Tier 6	15 bp on all additional funds	

Institutional Clients:

Single Annual Flat Fee for Services Selected as a co-fiduciary with *no* discretion over assets: Institutional - Full Service (Service List Identified below fee schedule)

a. Retirement Plan Assets Below \$1MM -	Fee Ranges between \$ 3,000 - \$ 5,000	per year
b. Retirement Plan Assets between \$1MM - \$2MM -	Fee Ranges between \$ 5,000 - \$ 8,000	per year
c. Retirement Plan Assets between \$2MM - \$5MM -	Fee Ranges between \$ 8,000 - \$15,000	per year
d. Retirement Plan Assets between \$5MM - \$8MM -	Fee Ranges between \$12,000 - \$18,000	per year
e. Retirement Plan Assets between \$8MM - \$12MM -	Fee Ranges between \$16,000 - \$20,000	per year
f. Retirement Plan Assets between \$12MM - \$16MM -	Fee Ranges between \$18,000 - \$22,000	per year
g. Retirement Plan Assets between \$16MM - \$20MM	Fee Ranges between \$20,000 - \$25,000	per year
h. Retirement Plan Assets greater than \$20MM -	Fee ranges between \$20,000 - \$30,000	per year

2) Source: Deducted on a pro-rata basis from investor accounts or directly by Plan Sponsor or a combination of the two. Payer can be a combination of participant accounts on a pro-rata basis and Plan Sponsor directly. Such Fees are Received from record keeper, or Plan Sponsor typically on a quarterly basis and billed in arrears.

Fiduciary Status - Retirement Plan 3(21) Fiduciary or 3(38) Fiduciary: Fee increases for discretionary fiduciary services on asset management.

Services Provided and Customized for an Annual Flat Fee

Review plan's success in meeting participant's needs and retirement goals and make recommendations for changes.

- 1.00 Investment Analysis
 - 1.01 Define the client's investment-related goals and objectives
 - 1.02 Prepare and maintain the client's Investment Policy Statement ("IPS")
 - 1.03 Identify asset classes appropriate for client's portfolios
 - 1.04 Search for investment managers for investment options
 - 1.05 Conduct due diligence for investment options
 - 1.06 Choose investments and create portfolios according to the terms of the IPS
 - 1.07 Develop and maintain model portfolios
 - 1.08 Control and account for investment expenses
 - 1.09 Monitor investment options and prepare periodic investment reports
 - 1.10 Design rules for assigning participants to QDIAs
 - 1.11 Construct QDIA investment alternatives
 - 1.12 Place participants in appropriate investments
 - 1.13 Assist participants in selecting investments

Quarterly report investment decisions made to plan sponsor and Named Fiduciary

- 2.00 Plan Support Services
 - 2.01 Conduct a fiduciary assessment
 - 2.02 Oversee plan administration activities
 - 2.03 Support DOL and IRS audits
 - 2.04 Select, hire and monitor certain service providers
- 3.00 Recordkeeper Selection and Monitoring

- 3.01 Collect data about the plan to develop a Request For Proposal that is used in a recordkeeping provider search
- 3.02 Conduct search for recordkeeping provider
- 3.03 Evaluate the capabilities of recordkeeping providers, based on industry norms and *Request For Proposal*
- 3.04 Interview finalists in the provider search and select recordkeeper
- 3.05 Evaluate the recordkeeper on a regular basis to measure compliance with plan documents and standards and assist with necessary corrective action
- 4.00 Trustee/Custodian Selection and Monitoring
- 4.01 Collect data about the plan to develop a Request For Proposal that is used in a trustee/custodian search
- 4.02 Conduct search for trustee/custodian
- 4.03 Evaluate the capabilities of trustee/custodians, based on industry norms and Request For Proposal
- 4.04 Interview finalists in the trustee/custodian search and select trustee/custodian
- 4.05 Evaluate the trustee/custodian on a regular basis to measure compliance with plan documents and standards and assist with necessary corrective action
- 4.06 Evaluate and measure the trustee/custodians' proxy voting procedure
- 5.00 Participant Services
- 5.01 Evaluate and determine the educational needs of the plan sponsors and plan participants, and establish educational objectives
- 5.02 Formulate a plan and system to measure progress in achieving educational objectives
- 5.03 Develop participant educational materials, enrollment materials and enrollment meetings
- 5.04 Conduct investment education and enrollment and other education meetings
- 5.05 Monitor the participant demographics for asset allocation to identify additional needs for specific groups of participants
- 5.06 Evaluate the quality of services provided to participants to ensure that industry norms are achieved
- 5.07 Perform one-on-one educational and individual sessions per participant request.
- 5.08 Perform Webinars and conference calls with participants ad hoc and on demand
- 6.00 Plan Conversion
- 6.01 Assist in the process of converting the plan to the newly selected providers and act as the liaison between former and newly appointed provider
- 6.02 Review, advise and assist with the negotiation of the service and/or trust agreement with the new provider
- 7.00 Other Services-Projects and Special ad hoc requests
- 7.01 Provide Client Portal for safe keeping of documents and fiduciary process

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

We do not charge performance based fees.

Item 7 *Types of Clients*

- 1- Private and public companies
- 2- Government agencies
- 3- Municipalities
- 4- Hospitals and Churches
- 5- Schools and Educational Institutions
- 6- Foundations and Non-profit entities
- 7- Individuals and business owners

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

Fiduciary Experts provides the investment strategy and its implementation for all clients, utilizing a variety of securities such as stocks, bonds, Exchange Traded Funds (ETFs) or pooled investment vehicles (such as mutual funds). Analysis for institutional portfolios differs from that of individual investors due to ERISA compliance and proper asset allocation management of such portfolios.

Our clients receive the benefit of developed investment philosophies and strategies, research and due diligence, account monitoring, and personal financial planning recommendations. Expansive academic research, investment information, and certain proprietary analyses are drawn upon by Main Street Capital Advisors, FI360, and Fiduciary Benchmarks Inc. in order to provide innovative investment advisory services.

Each client receives a written Investment Policy Statement, which sets forth a recommended model allocation based on the clients' risk tolerance, age, and objectives. Specific no-load mutual funds and other investment products and securities are then recommended to clients. Clients' portfolios are periodically monitored, and changes to investment portfolios are suggested when appropriate. A disciplined approach to rebalancing is employed in order to maintain asset class exposures within desired risk tolerances, subject to variances permitted for tax reduction, tax planning or other reasons.

Methods of Analyses and Investment Strategies

Institutional Advise:

Upon the creation of the IPS we are able to apply a consistent model for monitoring and addressing issues associated with such assets. Specific criteria for benchmarking is based on factors selected within the IPS in order to apply a consistent method for evaluating such assets and taking the proper steps to advise on changes or updates.

Individual Advise:

We rely on specific information pertaining to the clients' financial situation, estate planning, tax planning, risk management planning, short-term and long-term lifetime financial goals and objectives, investment time horizon, and perceived current tolerance for risk. This information becomes the basis for the model Investment Policy Statement which we best meet the clients' stated long term personal financial goals. The model Investment Policy Statement provides for investments in those asset classes which is designed to allocate combinations of return, risk, and correlation over the long term. A tremendous amount of academic research reveals that strategic asset allocation is determinative of the majority of the expected long-term gross returns of investor's portfolios.

Part of our selection of asset classes is driven by research into global asset classes by such academics as Professor Eugene Fama, Sr. of the University of Chicago Booth Graduate School of Business and the Center for Research in Security Prices, Professor Kenneth French of Dartmouth College, and many other academics and researchers. The investment advice which we Provide is based upon long-term investment strategies which incorporate the principles of Modern Portfolio Theory. The utilization of several different asset classes as part of an investor's portfolio is emphasized: Equity, Fixed Income, and Cash equivalents.

Our investment approach is firmly rooted in the belief that markets are fairly efficient and that investors' gross returns are determined principally by asset allocation decisions. A focus is provided on developing and implementing globally diversified portfolios, principally through the use of low-cost and tax-efficient passively managed stock mutual funds, many of which are available only to institutional investors and clients of advisors granted access to such funds. Investment policy and overall portfolio weightings as between equities and fixed income investments are based upon each client's needs and desires, perceived risk tolerance, the need to assume various risks, and investment time horizon. We may use tactical asset allocation strategies in connection with the management of client portfolios by overweighting or underweighting a particular asset class.

Methods of Analysis; Sources of Information

Our security analysis is based upon a number of factors including those derived from commercially available software technology, securities rating services, general economic and market and financial information, due diligence reviews, and specific investment analyses that clients may request. The main sources of information include commercially available investment information and evaluation services, financial newspapers and journals, academic white papers and periodicals. Prospectuses, statements of additional information, other issuer-prepared information, and data aggregation services (Morningstar Advisor) are also utilized. Our advisors also attend various investment and financial planning conferences. Research is also received from consultants, including Main Street Capital Advisors.

Types of Investments

- Mutual Funds
- ETFs
- Variable Annuities
- Fixed Annuities
- Bonds
- CD's
- Money Markets and Stable Value

Recommendations may be undertaken to advise clients to invest in low-cost, no-load (no commission), variable, or fixed deferred or immediate annuities when appropriate to the circumstances and tax situation of the client.

Risk of Loss

Investing in securities involves a risk of loss that clients should be prepared to bear. The investment recommendations seek to limit risk through broad global diversification in equities (through broadly diversified stock mutual funds), and investment in fixed income securities or diversified bond funds.

However, the investment methodology will still subject the client to declines in the value of their portfolios, which can at times be dramatic. Fiduciary Experts believes a high probability exists in most market environments of a long-term (15-year or greater) outperformance of small cap and value stocks, relative to large cap and growth stocks, and hence the stock (equities) portion of an investor's portfolio may be "tilted" toward small cap and value stocks. Accordingly, the normally greater expected returns of the equity portion of the portfolio will in turn often permit the overall allocation to equities (stocks, stock mutual funds) to be reduced, and the allocation to fixed income investments increased. Fiduciary Experts believes this is the best manner to temper the shorter-term volatility of the stock market, especially for clients who derive cash flow from their portfolios, such as clients who are in retirement years.

While we seek to reduce non-compensated risks to which a client may be exposed, other risks (including but not limited to the risk of a general stock market decline) may be assumed in order to seek to attain the clients' longer-term financial goals and objectives. However, we cannot provide any guarantee that the clients' goals and objectives will be achieved.

Types of Risk

Fiduciary Experts seeks to educate clients of various risks and select only those risks that they can tolerate in exchange for potential return. Investors face the following investment risks:

☐ **Interest-Rate Risk:**

Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.

☐ **Market Risk:**

The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.

☐ **Inflation Risk:**

When inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.

☐ **Currency Risk:**

Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.

☐ **Reinvestment Risk:**

This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.

☐ **Business Risk:**

These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.

☐ **Liquidity Risk:**

Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.

☐ **Financial Risk:**

Excessive borrowing to finance a business' operations increases the risk of profitability,

because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

☐ Small Capitalization Stock Risk:

Small companies often have narrower markets and limited financial resources, so investments in these stocks present more risk than investments in those of larger, more established companies.

☐ Value Style Investing Risk:

Companies that are thought to be “under-valued” may never reach their full estimated market value and value style investing may fall out of favor and underperform growth or other style investing during given periods.

Item 9 Disciplinary Information

There is no disciplinary action in the past or pending for our firm and its employees

Item 10 Other Financial Industry Activities and Affiliations

There are no affiliations or activities outside of our RIA service model.

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

Code of Ethics

Fiduciary Experts has adopted a Code of Ethics, to which all employees are bound to adhere.

The key component of our Code of Ethics states:

Fiduciary Experts LLC and its investment advisor representatives and employees shall always:

- ☐ Act in the best interests of each and every client; and put our fiduciary duty and role in writing.
- ☐ Act with integrity and dignity when dealing with clients, prospects, team members, and others;
- ☐ Strive to maintain and continually enhance our high degree of professional education regarding Fiduciary, ERISA, investments, tax, estate, and risk management planning;
- ☐ Seek at all times to preserve our firm's independence and to maintain our complete objectivity with respect to our advisory services and each recommendation made to our clients.

Fiduciary Experts further adopted a detailed Code of Ethics expressing the firm's commitment to ethical conduct, which is adopted by reference and which is utilized to guide the personal conduct of our various team members. This detailed Code of Ethics describes the firm's fiduciary duties and responsibilities to clients and sets forth our practices of supervising the personal securities transactions of employees with prior or concurrent access to client trade information. Fiduciary Experts will provide a complete copy of the Code of Ethics to any client or prospective client upon request.

Item 12: Brokerage Practices

We are not affiliated with a broker/dealer other than a custodial relationship to enhance transparency and avoid any conflicts of interest.

Selected Brokerage Firms (Custodians)

Fiduciary Experts utilizes the services of TD Ameritrade Institutional, and TD Ameritrade Trust to provide our team members with access to institutional trading and custody services, which are not typically available to retail investors.

These services generally are available to independent investment advisors on an unsolicited basis and at no charge to them. However, not all independent investment advisors recommend their clients to utilize particular custodians.

Item 13: Review of Accounts

For Institutional Clients:

Fiduciary Experts conducts quarterly portfolio reviews for each client and provides a face to face presentation of such reports to its institutional 401k, 403b and 457 Plans. When addressing participant accounts individually we provide ad hoc reports and analysis as needed or as requested by the employee him/her self. We provide a website and helpdesk exclusively to address such concerns as well as common service plan requests by setting up meetings face to face with the employees or via web or phone conference call.

For individual portfolios:

Periodic Portfolio Reviews are undertaken by advisors of Fiduciary Experts to ascertain if the values in any asset class have strayed beyond their target minimums or maximums, and for purposes of meeting clients' cash flow needs.

Even if one or more asset classes fall outside their target minimums or maximums, the advisor may determine not to rebalance the asset class for various reasons, such as avoidance of short term capital gains, deferring long-term capital gains realization, minimization of transaction costs, or our view on whether the asset class is undervalued or overvalued relative to historic norms and our view of the level of the macroeconomic risks to which the asset class may be exposed. Such in-house portfolio reviews are subject to additional restrictions set forth below.

Additional Portfolio Reviews are undertaken upon request by the client, such as when special cash needs arise or when additional cash or securities are added to the investment portfolio. We will respond to such requests within a reasonable period of time.

Other conditions that may trigger a review are changes in the tax laws, new investment information, and changes in a client's own situation. Portland Financial Advisors may also undertake sales and purchases during this time to effect tax loss harvesting, in addition to rebalancing actions.

Account reviewer is Maribel Larios, MBA, CFA Level I Candidate, and AIF® who considers the clients' current security positions and the likelihood that the performance of each security will contribute to the investment objectives of the client.

In undertaking rebalancing actions, Fiduciary Experts will seek to rebalance one or more asset classes closer to the targets. We may decline to rebalance a specific asset class, due to tax concerns, high transaction costs relative to the trade amount, or other reasons.

Fiduciary Experts may estimate the market close at any point during the day during which trades are being made, and undertake trades on that basis. Since the stock market is very volatile, especially in the last hour of trading, this may cause us to underestimate or overestimate the amount needed to effect a rebalancing action.

Item 14: Client Referrals and Other Compensation

Fiduciary Experts LLC does not provide or accept compensation from any person for client referrals.

Referrals to other professionals may be undertaken where appropriate to meet the clients' needs. These situations include:

☐ Referral to other professionals such as CPAs, ERISA attorneys, Estate Planning Attorneys, Tax professionals, and other professions as it relates to helping our clients meet their needs.

Item 15: Custody

It is our policy to not accept custody of clients' securities. In other words, Fiduciary Experts LLC is not granted access to our clients' accounts, which would enable us to withdraw or transfer or otherwise move funds or cash from any client account to our accounts or the account of any third party (other than for purposes of fee deductions, as explained below). This is for the safety of our clients' assets.

However, with client consent, we may be provided with the authority to seek deduction of advisors' fees from clients' accounts; this process generally is more efficient for both the client and the investment advisor, and there may be tax benefits for the client to this method when fees can be paid from certain tax-deferred accounts of clients.

All of our clients receive account statements directly from qualified custodians or record-keepers, that maintain those assets. Clients should carefully review these account statements, and compare them to the quarterly or other reports. We urge all of our clients to review statements from the custodians in order to ensure that all account transactions, including deductions to pay advisory fees remain proper, and to contact us with any questions.

Item 16: Investment Discretion

Fiduciary Experts accepts limited forms of discretion over clients' accounts, as follows, with the consent of the client. Each client's grant of discretion is evidenced in the client services agreement (or addendums thereto) signed by the client, and is further evidenced to the custodians through a limited power of attorney contained in the account establishment form signed by the client or a separate limited power of attorney document signed by the client.

Some clients appoint Fiduciary Experts as the clients' agent and attorney-in-fact with respect to undertaking trades in client accounts; ability to enter trades electronically for clients often provides reduced transaction fees and other benefits to our client.

Please note that Fiduciary Experts prefers to contact clients in advance of trades or transactions outside of discretionary accounts prior to such activity, but the limited. Moreover, Fiduciary Experts LLC seeks to undertake a minimal amount of trading in client accounts, in order to keep transaction fees, other expenses, and tax consequences associated with trading to minimal levels.

Limited discretion to rebalance in accordance with investment policy – for some client accounts. With client consent, we will accept from clients' discretion to deploy cash additions (or cash arising from the redemption of maturity of securities) in clients' portfolio in accordance with the clients' investment policy statement.

In addition, Fiduciary Experts will accept from such clients the discretion to rebalance the clients' portfolio back closer to its desired targets. Clients typically grant such authority to us for rebalancing purposes when the clients' business affairs or travels are such that the client is likely to be unavailable to us to confer, prior to entering any recommended trade(s).

Fiduciary Experts has the ability to be a 3(38) fiduciary on retirement plans and as such creates and executes model portfolios for client plans as well as monitor and replace investment options as appropriate per the Investment Policy Statement.

Item 17 Voting *Client* Securities

As a matter of firm policy and practice, Fiduciary Experts LLC does not accept authority to vote proxies on behalf of clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. Generally, clients will receive their proxies or other solicitations directly from the custodian or transfer agent. However, clients may call or e-mail their advisor with questions regarding a particular proxy or other solicitation, and we may provide advice to clients regarding their voting of proxies or such solicitations, upon request of a client or clients or in unusual circumstances.

Item 18 Financial Information

N/A

Fiduciary Experts LLC is not subject to any financial reporting requirements and has never filed for bankruptcy.

Item 19 Requirements for State-Registered Advisers

Employee Information

Please refer to the Brochure Supplement on pages 34 -37.

Business Continuity Plan Fiduciary Experts has a Business Continuity Plan in place (outlined in the firm's compliance manual) that provides steps to mitigate and recover from the loss of office space, communications, services or key people.

Disasters

The Business Continuity Plan covers natural disasters such as snow storms, hurricanes, tornados, and flooding. The Plan covers man-made disasters such as loss of electrical power, loss of water pressure, fire, bomb threat, nuclear emergency, chemical event, biological event, telephone line outage, Internet outage, railway accident and aircraft accident. Electronic files are backed up daily and archived offsite.

Alternate Offices

Alternate offices are identified to support ongoing operations in the event the main office is unavailable. It is our intention to contact all clients within five days of a disaster that dictates moving our office to an alternate location.

Information Security

Fiduciary Experts LLC maintains an information security program to reduce the risk that personal and confidential information may be breached. Fiduciary Experts LLC employs a firewall barrier and authentication procedures in our computer environment.

Privacy Notice

Portland Financial Advisors is committed to maintaining the confidentiality, integrity and security of the personal information that is entrusted to us. Fiduciary Experts will provide a complete copy of our Code of Ethics to any client or prospective client upon request.

Document Retention

Fiduciary Experts LLC will maintain all client documentation for the required period that records are required to be maintained by federal and state authorities. After that time, information may be destroyed.