

**ITEM 1: COVER PAGE**

**FutureAdvisor**

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**FORM ADV PART 2A  
FIRM BROCHURE  
May 2011**

This brochure provides information about the qualifications and business practices of FutureAdvisor. If you have any questions about the contents of this brochure, please contact us at 206.973.7407 or by email at [advisors@futureadvisor.com](mailto:advisors@futureadvisor.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.

## ITEM 2: INITIAL FIRM BROCHURE

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#### ITEM 4: ADVISORY BUSINESS

Xulu Inc. is an investment advisor registered with U.S. Securities and Exchange Commission, which operates an Internet-based investment advisory business under the name FutureAdvisor. Xulu Inc. has been in business since 2010. Its principal owners are Jon Chang Zheng Xu and Bo Lu.

FutureAdvisor (“Advisor”) offers investment advice and portfolio optimization services to individuals through a secured Web site: <https://www.futureadvisor.com>. FutureAdvisor’s goal is to provide you an Internet-based investment management service through which where you can receive investment advice for all of your portfolio holdings in one user-friendly Web site.

FutureAdvisor offers you an opportunity to consider ways to optimize your holdings to help you meet your overall investment goals. FutureAdvisor nor anyone else can guarantee a specific level of return on your investments, since investing in the markets always involves a risk of loss particularly in volatile market conditions.

FutureAdvisor offers an Analysis Service that we believe will give you an excellent opportunity to assess your investments and to receive ongoing investment advice to manage those assets. This automated service will provide analyses and recommendations based on the financial and other information provided by the client.

**PLEASE NOTE:** The Analysis Service requires clients to provide accurate and complete information in order to generate recommendations based on their personal circumstances. The advice is useful only to the extent that clients provide adequate information.

Investment advice may include recommendations to buy, sell, or exchange specific securities, to consider a different broker, to move assets from one account to another, and related information.

##### Other Services

Infrequently, FutureAdvisor may furnish advice to clients on matters not involving securities. This is usually advice about current assets with respect to the client’s long-term goals and saving rate with respect to these goals. There is no separate fee for these services; they are provided as part of either or both of the services described above.

#### ITEM 5: FEES AND COMPENSATION

##### Analysis Service:

FutureAdvisor’s Subscription Analysis Services are available through subscription fees, as detailed on the sign up page at <https://www.futureadvisor.com/signup>. Fees are payable either on a monthly basis or as part of an annual plan, with fees paid on a quarterly basis in advance.

If paid quarterly, the first quarterly payment of \$40, \$62.50, or \$107.50 (depending on your asset level and plan) is due at the start of the subscription; the remaining payments are due on the first day of the three remaining quarters. In the event that a client would like to terminate an annual

subscription, it will be terminated at the end of the month in which FutureAdvisor receives the notice of termination.

If paid monthly, monthly payments are \$18, \$28, or \$48 depending on your asset level and plan. Fees are payable at the beginning of each month. Monthly subscriptions may be terminated at the end of the month in which FutureAdvisor receives a notice of termination.

Individuals who subscribe to FutureAdvisor.com during its early period may pay a lower fee or receive other discounts compared to later subscribers, since fees are subject to change. FutureAdvisor.com will notify prospective subscribers of current subscription rate via its website.

#### Negotiable Fees

Fees may be negotiable in some instances, for example, for companies who offer their employees access to FutureAdvisor's services.

#### Account Termination

If a client wishes to terminate an existing Analysis or Wealth Management relationship with FutureAdvisor, he or she can do so at any time via the FutureAdvisor.com website.

- For subscribers billed monthly, billings will stop immediately.
- For clients charged an annual fee that is payable quarterly in advance, billings will also stop immediately. Pro-rated refunds will be issued for time remaining in the current quarter.

### ITEM 6: PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

FutureAdvisor does not charge performance-based advisory fees. In addition, FutureAdvisor has no arrangements in which separate types of accounts are management separately on a side-by-side management basis.

### ITEM 7: TYPES OF CLIENTS

FutureAdvisor offers its advisory services to individuals.

### ITEM 8: METHOD OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

Types of Investments: FutureAdvisor offers investment advice on the following types of investments: equity securities that are exchanged traded or that are offered by foreign issuers; commercial paper; mutual fund shares; ETFs; and U.S. government securities.

Strategy: FutureAdvisor's primary investment strategy involves using long-term purchases (that is securities held for at least one year).

Method of Analysis: When analyzing investments for client accounts, FutureAdvisor uses a number of sources of information including charting, fundamental analysis, and technical data.

Sources of Information: FutureAdvisor's main sources of information for client account recommendations and transactions include financial newspapers and magazines; inspections of corporate activities; search materials prepared by independent third parties; corporate rating services; SEC filings (including annual reports and prospectuses); company press releases; and other sources of information.

These other sources of information include fundamental data about mutual funds and ETFs provided by Lipper Inc, a subsidiary of Thomson Reuters. FutureAdvisor pays a monthly subscription cost for this data from Lipper Inc.

#### Risks Disclosures:

Investing in any type of securities involves a risk of loss especially during volatile markets. FutureAdvisor cannot predict how markets will move, and how the securities recommended by FutureAdvisor will respond.

#### ITEM 9: DISCIPLINARY INFORMATION

There are no adverse events affecting FutureAdvisor that would be material to a client's decision to use FutureAdvisor's investment advisory services.

- A. There have been no criminal or civil actions in a domestic, foreign or military court of competent jurisdiction involving either FutureAdvisor or a management person.
- B. There have been no administrative proceedings before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority involving either FutureAdvisor or a management person.
- C. There have been no self-regulatory organization (SRO) proceedings involving either FutureAdvisor or a management person.

#### ITEM 10: OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

- A. Neither FutureAdvisor nor its management persons are registered or have pending registrations as a broker-dealer or a registered representative of a broker-dealer.
- B. Neither FutureAdvisor nor its management persons are registered or have pending registrations as a futures commission merchant, commodity pool operator, a commodity-trading adviser, or as an associated person of the foregoing list.
- C. Neither FutureAdvisor nor its management persons have relationships with other entities in the financial services industry that materially affect FutureAdvisor's advisory business or its clients.

D. FutureAdvisor does not recommend or select other investment advisers.

#### ITEM 11: CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

Neither FutureAdvisor nor any person related to FutureAdvisor recommends securities in which FutureAdvisor or its employees have material financial interests.

FutureAdvisor's employees may invest in the same mutual funds, ETFs, or other securities that FutureAdvisor recommends to the firm's clients. Employees of FutureAdvisor and the firm will comply with the FutureAdvisor's Code of Ethics to avoid or minimize conflicts of interest pertaining to its securities recommendations.

#### ITEM 12: BROKERAGE PRACTICES

FutureAdvisor does not select broker-dealers for its Analysis client accounts. FutureAdvisor may suggest broker-dealers to clients in situations when FutureAdvisor's automated computer algorithms find that another broker may be able to provide services better suited to a particular client.

#### ITEM 13: REVIEW OF ACCOUNTS

Accounts of clients using FutureAdvisor's Analysis Service are reviewed through automated computer algorithms when clients choose to have a review conducted. The review is self-service. FutureAdvisor does not otherwise conduct reviews of these accounts.

#### ITEM 14: CLIENT REFERRALS AND OTHER COMPENSATION

FutureAdvisor may conduct campaigns through advertising networks (such as Google AdWords/AdSense, Microsoft AdCenter). When visitors to FutureAdvisor.com or potential clients are "referred" through the advertising networks, FutureAdvisor may compensate the referring network.

In addition, at certain times FutureAdvisor may offer a refer-a-friend bonus that compensates existing clients for referring new clients to the service. This compensation may take the form of discounted or free membership to FutureAdvisor.

FutureAdvisor may enter agreements with companies who offer their employees access to the advisory services offered by FutureAdvisor. In these cases, the employers would pay the fees charged by FutureAdvisor on behalf of their employees.

ITEM 15: CUSTODY

FutureAdvisor does not have custody of client assets.

ITEM 16: INVESTMENT DISCRETION

FutureAdvisor does not accept discretionary authority with respect to its client accounts.

ITEM 17: VOTING CLIENT SECURITIES

FutureAdvisor does not vote proxies for its client accounts.

ITEM 18: FINANCIAL INFORMATION

- A. FutureAdvisor does not require or solicit payment of more than \$1200 in fees per client, six months or more in advance.
- B. FutureAdvisor has no financial condition that is reasonably likely to impair FutureAdvisor's ability to meet contractual commitments to its clients.
- C. FutureAdvisor has not been subject to a bankruptcy petition.