



## **FINGAGE ADVISORS LLC**

1122 Clay Street  
San Francisco, CA 94308  
[www.Fingage.com](http://www.Fingage.com)

### **Form ADV Part 2A**

### **Client Brochure**

March 15, 2016

This brochure ("Brochure") provides information about the qualifications and business practices of Fingage Advisors LLC ("Fingage"), a registered investment adviser registered with the United States Securities and Exchange Commission ("SEC"). Registration does not imply a certain level of skill or training. 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.

If you have any questions about the contents of this Brochure, please contact us at (262) 346-4243 or [info@Fingage.com](mailto:info@Fingage.com). Additional information about Fingage is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

Fingage® is a registered trademark of Fingage Holdings Inc. Fingage Advisors LLC is a wholly owned subsidiary of FINGAGE HOLDINGS INC.

## Form ADV Part 2 Client Brochure

### **Item 2 Material Changes**

This is Fingage's initial ADV Part 2A filing.

## Item 3 Table of Contents

Client Brochure .....	1
Item 2 Material Changes .....	2
Item 3 Table of Contents.....	3
Item 4 Advisory Business.....	4
Item 5 Fees and Compensation.....	6
Item 6 Performance-Based Fees and Side-by-Side Management.....	7
Item 7 Types of Clients.....	8
Item 8 Methods of Analysis, Investment Strategies and Risk of Loss .....	9
Item 9 Disciplinary Information.....	13
Item 10 Other Financial Industry Activities and Affiliations.....	14
Item 11 Code of Ethics, Participation or Interest in Client Transactions and Personal Trading ..	15
Item 12 Brokerage Practices .....	16
Item 13 Review of Accounts .....	17
Item 14 Client Referrals and Other Compensation .....	18
Item 15 Custody .....	19
Item 16 Investment Discretion.....	20
Item 17 Voting Client Securities.....	21
Item 18 Financial Information .....	22
Form ADV Part 2B Client Brochure Supplement .....	23

## Form ADV Part 2 Client Brochure

### Item 4 Advisory Business

#### A. Firm Information

Fingage Advisors LLC (Fingage), established in 2016, is a wholly owned subsidiary of FINGAGE HOLDINGS INC. (FHI), a privately held company. Additional information about Fingage is provided on Part 1 of Fingage's Form ADV, which is available online at <http://www.adviserinfo.sec.gov>.

#### B. Overview of Services

Fingage offers a unique investment service, which builds on modern portfolio theory and incorporates the latest advances in retirement planning, asset allocation and risk management techniques to provide investors with optimal goal-based investment strategies. Fingage offers both individuals and institutions access to its investment management services, which are customized and designed to help clients achieve their investment objectives with the least risk possible.

Fingage Advisors LLC ("Fingage") provides investment advice to retirement plan participants ("Advice Clients") to assist Advice Clients to select an appropriate life cycle investment strategy and an appropriate mix of investments that are made available to them through their employer-sponsored or public retirement plan ("Plan"). Fingage offers its Advice Clients the ability to provide information about their age, financial situation, and investment goals, through the Fingage interactive website portal.

Fingage is an Independent Investment Adviser and does not receive any compensation from those who provide or manage investments that are available through the Plan. Fingage charges a fee that is based upon a percentage of Plan assets, the number of Plan participants and/or a flat dollar amount. As such, Fingage has no incentive to direct an Advice Client to invest in one investment option over another. 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, Fingage 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. Unless Fingage is also providing Independent Plan Investment Advice to the Plan, Fingage, has no obligation, fiduciary or otherwise, to select and monitor the investment options made available under the Plan.

#### C. Sub-Advisory Services

In addition to providing investment advisory and related services directly to clients under arrangements with employer-sponsored or public plans and plan sponsors, Fingage may also have arrangements with financial institutions to provide similar services on a sub-advisory basis. Fingage or FHI may license certain technology and software, and provide other services to financial services firms to enable those firms to provide investment advisory and related services. For example, Fingage and FHI may develop and host customized or private-labeled websites to enable a financial institution to make investment advisory and related services available to that institution's clients. Depending on the particular

arrangement with the financial institution, Fingage may act as sub-advisor to the financial institution, or Fingage or FHI may act as a technology vendor and the financial institution will be responsible for making investment recommendations to its clients.

## **E. Related Services**

Fingage may also provide its Investment Advisory service for institutions or collective accounts in the defined benefit space, we may consult with clients directly to assess their investment goals and risk tolerance in order to provide a bespoke digital platform solution. Similar to individual accounts, we provide a customized asset allocation strategy and we implement it using the most efficient vehicle such as low cost ETFs, mutual funds, or other investments to represent each of the asset classes in the client's portfolio as described under the sections above.

Fingage also provides other investment-related services, including investment guidance and education. Such education and/or guidance may include projections related to income planning, and Social Security guidance intended to help participants and others nearing retirement better understand their Social Security claiming options. Fingage and FHI may also provide investment or financial guidance and education services to retirement plan participants. These services are typically separate from the investment advisory services that Fingage may also provide to the same plan participants.

## **F. Assets Under Management**

As disclosed in Fingage Advisors LLC's Form ADV Part 1, Fingage is a new manager and currently manages no client assets through our software based financial advisor service on a discretionary basis. Fingage does not manage assets on a nondiscretionary basis.

## Form ADV Part 2 Client Brochure

### Item 5 Fees and Compensation

#### A. Advisory Fees

Fingage is compensated for its advisory services by charging a fee based on the net market value of a Client's Account. Fingage may also provide its services in exchange for a flat fee. Fingage reserves the right, in its sole discretion, to negotiate, reduce or waive the advisory fee for certain Client Accounts for any period of time determined by Fingage Advisors LLC. In addition, Fingage may reduce or waive its fees for the Accounts of some Clients without notice to, or fee adjustment for, other Clients.

Fingage utilizes the proprietary software from Fingage Holdings Inc. to provide personalized financial advisory services and charges an annualized fee of 0.25% on a Client's assets under management. In some cases Clients have the opportunity to have a portion of their assets managed for free. Annual fees are charged on a monthly basis as explained below.

Fingage Advisors LLC's fees are not charged in advance, and are calculated on a continuous basis and deducted from Client Accounts each month as follows: Fingage calculates a daily advisory fee, which is equal to the fee rate multiplied by the net market value of the Client's Account as of the close of trading on the New York Stock Exchange ("NYSE") (herein, "close of markets") on such day, or as of the close of markets on the immediately preceding trading day for any day when the NYSE is closed, and then divided by 365 (or 366 in any leap year). The advisory fee for a calendar month is equal to the total of the daily fees calculated during that month (less any deductions or fee waivers) and is deducted from Client Accounts no later than the tenth business day of the following month.

#### B. Other Account Fees

Fingage is a "fee only" investment advisor, and other than its advisory fee described above, neither the firm nor its employees receive or accept any direct or indirect compensation related to investments that are purchased or sold for Client Accounts. This means that Clients will not be sold products or services that create additional fees or compensation to benefit Fingage or its employees or its affiliates other than those described in this Brochure and on the Site. However, in addition to advisory fees, Clients may also pay other fees or expenses to third-parties.

The issuer of some of the securities or products we purchase for Clients, such as ETFs or other similar financial products, may charge product fees that affect Clients. Fingage does not charge these fees to Clients, and does not benefit directly or indirectly from any such fees. An ETF typically includes embedded expenses that may reduce the fund's net asset value, and therefore directly affect the fund's performance and indirectly affect a Client's portfolio performance or an index benchmark comparison. Expenses of an ETF may include management fees, custodian fees, brokerage commissions, and legal and accounting fees. ETF expenses may change from time to time at the sole discretion of the ETF issuer. Fingage discloses each ETF's current information, including expenses, on the Site.

## **Form ADV Part 2 Client Brochure**

### **Item 6 Performance-Based Fees and Side-by-Side Management**

Fingage does not charge performance-based fees. Our advisory fees are only charged as disclosed above in Item 5.

## Form ADV Part 2 Client Brochure

### Item 7 Types of Clients

There is no minimum amount required to open an account. To maintain an account after a period of 12 months the account must have a balance of \$500. As a result of the automation associated with offering its services online, Fingage makes it possible for retail investors, as well as retirement accounts and trusts, to access its service with much lower account minimums than normally available in the industry. Clients have real-time access to their Accounts through the Site. Additional requirements for opening an Account with Fingage are described in Item 3, above.

At any time, a Client may terminate an Account.

Investors evaluating Fingage Advisors LLC's software based financial advisor service should be aware that Fingage Advisors LLC's relationship with Clients is likely to be different from the "traditional" investment advisor relationship in several aspects:

1. Fingage is a software based financial advisor which means each Client must acknowledge her ability and willingness to conduct his or her relationship with Fingage on an electronic basis. Under the terms of the Account Agreement, each Client agrees to receive all Account information and Account documents (including this Brochure), and any updates or changes to same, through her access to the Site and Fingage Advisors LLC's electronic communications. Unless noted otherwise on the Site or within this Brochure, Fingage Advisors LLC's advisory service, the signature for the Account Agreement, and all documentation related to the advisory services are managed electronically.
2. To provide its advisory services and tailor its investment decisions to each Client's specific needs, Fingage collects information from each Client, including specific information about his or her investing profile such as financial situation, investment experience, and investment objectives. Fingage maintains this information in strict confidence subject to its Privacy Policy, which is provided on the Site. When customizing its investment solutions, Fingage relies upon the information received from a Client. Although Fingage contacts its Clients periodically as described further in Item 13 below, a Client must promptly notify Fingage of any change in his or her financial situation or investment objectives that might require a review or revision of her portfolio.
3. The software based financial advisor service includes preselected ETFs and funds for each asset class within the plan recommended to a Client. Fingage does not allow individual participants to select their own ETFs or funds because each ETF and fund is considered to be part of the overall investment plan. Individual investors with specific restrictions may not be able to become Clients.



## Form ADV Part 2 Client Brochure

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

For its software based financial advisor service, Fingage provides Clients with financial advice that is based on the latest advances in wealth planning and portfolio construction. We don't rely only on Modern Portfolio Theory (MPT) like most digital advisors because MPT is over 60 years old and does not address important wealth and retirement planning considerations. The MPT is about constructing the most diversified portfolio for a given level of risk to obtain the highest expected return over the next period. Investors are faced however with the task of choosing an asset allocation strategy over their lifetime that will maximize their retirement income while minimizing the risk of income shortfall post retirement. We employ the latest advances in financial modeling over long-period of times to design a personalized glide path for each investor that spans the period between when he uses the services of Fingage and his planned retirement date. To do that we employ Monte Carlo simulations based on our capital market expectations and our state-of-the-art dynamic risk management to model future behavior of markets including extreme and rare events such as recessions and financial crises like the 2008-2009 crises. And based on the Monte Carlo simulations we come up with the optimal personalized glide path. We then use a modern version of MPT at every point in time to find the most efficient implementation of the asset allocation of the portfolio of the client. MPT attempts to maximize a portfolio's expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, by selecting the proportions of various asset classes rather than selecting individual securities. Our modern version of MPT includes a much more important measure of risk than just standard deviation. Instead of doing a trade-off between a portfolio's expected return and expected standard deviation which ignores the probability of extreme market moves we employ a Mean-Conditional Value at Risk optimization which better captures the risk that investors are exposed to in their portfolios. Historically, Monte-Carlo based wealth planning with consideration for the risk of recessions and financial crises was only available to pension plans, sovereign wealth funds, and other institutional clients with large assets in the tens of millions. These strategies also came with large fees to justify the intensive research needed to create a bespoke asset allocation study. Fingage Advisors LLC's goal is to enable anyone saving for retirement to access the benefits of its institutional quality asset allocation and risk management expertise.

Fingage periodically reviews the entire population of more than 1,000 ETFs and mutual funds to identify the most appropriate ETFs or fund to represent each asset class. We look for ETFs and funds that minimize cost and tracking error and offer market liquidity. Many investors do not realize that some ETFs do not exactly track the indexes they were created to mimic. Choosing an ETF with a low expense ratio that does not track the asset class recommended by our service runs the risk of sub-optimizing a Client's portfolio's performance. We choose ETFs and funds that are expected to have sufficient liquidity to allow Client withdrawals at any time. Finally, we select ETFs and funds that have conservative and shareholder-friendly securities lending policies.

In addition to choosing what we believe to be the best ETFs at the time, we explain why we chose each one. We provide a detailed analysis of how the selected ETF stacked up against the second and third best choice for each asset class on the dimensions described in the paragraph above.

Additionally, Fingage works with existing approved plan investments, including mutual funds, CIT (commingled investment trusts), and ETFs when providing optimal retirement investment advice and investment portfolios.

Fingage continuously monitors our Clients' portfolios and periodically recommends rebalances to the Clients' target mix in an effort to optimize returns for the intended level of risk. We consider the volatility and correlations associated with each of our chosen asset classes when deciding when and how to rebalance.

## **RISK CONSIDERATIONS**

Fingage cannot guarantee any level of performance or that any Client will avoid a loss of Account assets. **Any investment in securities involves the possibility of financial loss that Clients should be prepared to bear.**

When evaluating risk, financial loss may be viewed differently by each Client and may depend on many different risk items, each of which may affect the probability of adverse consequences and the magnitude of any potential losses. The following risks may not be all-inclusive, but should be considered carefully by a prospective Client before retaining Fingage Advisors LLC's services. These risks should be considered as possibilities, with additional regard to their actual probability of occurring and the effect on a Client if there is in fact an occurrence.

**Market Risk**—The price of any security or the value of an entire asset class can decline for a variety of reasons outside of Fingage Advisors LLC's control, including, but not limited to, changes in the macroeconomic environment, unpredictable market sentiment, forecasted or unforeseen economic developments, interest rates, regulatory changes, and domestic or foreign political, demographic, or social events. If a Client has a high allocation in a particular asset class it may negatively affect overall performance to the extent that the asset class underperforms relative to other market assets. Conversely, a low allocation to a particular asset class that outperforms other asset classes in a particular period will cause that Client Account to underperform relative to the overall market.

**Advisory Risk**—There is no guarantee that Fingage Advisors LLC's judgment or investment decisions about particular securities or asset classes will necessarily produce the intended results. Fingage Advisors LLC's judgment may prove to be incorrect, and a Client might not achieve her investment objectives. Fingage may also make future changes to the investing algorithms and advisory services that it provides. In addition, it is possible that Clients or Fingage itself may experience computer equipment failure, loss of internet access, viruses, or other events that may impair access to Fingage Advisors LLC's software based financial advisory service. Fingage and its representatives are not responsible to any Client for losses unless caused by Fingage breaching its fiduciary duty.

**Volatility and Correlation Risk**—Clients should be aware that Fingage Advisors LLC's asset selection process is based in part on a careful evaluation of past price performance and volatility in order to evaluate future probabilities. However, it is possible that different or unrelated asset classes may exhibit similar price changes in similar directions which may adversely affect a Client, and may become more acute in times of market upheaval or high volatility. **Past performance is no guarantee of future results, and any historical returns, expected returns, or probability projections may not reflect actual future performance.**

**Liquidity and Valuation Risk**— High volatility and/or the lack of deep and active liquid markets for a security may prevent a Client from selling her securities at all, or at an advantageous time or price because Fingage and the Client's Broker may have difficulty finding a buyer and may be forced to sell at a significant discount to market value. Some securities (including ETFs) that hold or trade financial instruments may be adversely affected by liquidity issues as they manage their portfolios. While Fingage values the securities held in Client Accounts based on reasonably available exchange-traded security

data, Fingage may from time to time receive or use inaccurate data, which could adversely affect security valuations, transaction size for purchases or sales, and/or the resulting advisory fees paid by a Client to Fingage Advisors LLC.

**Credit Risk**—Fingage cannot control and Clients are exposed to the risk that financial intermediaries or security issuers may experience adverse economic consequences that may include impaired credit ratings, default, bankruptcy or insolvency, any of which may affect portfolio values or management. This risk applies to assets on deposit with any Broker utilized by Client, notwithstanding asset segregation and insurance requirements that are beneficial to Broker clients generally. In addition, exchange trading venues or trade settlement and clearing intermediaries could experience adverse events that may temporarily or permanently limit trading or adversely affect the value of Client securities. Finally, any issuer of securities may experience a credit event that could impair or erase the value of the issuer's securities held by a Client. Fingage seeks to limit credit risk by generally adhering to the recommendation of the purchase of ETFs, which are subject to regulatory limits on asset segregation and leverage such that fund shareholders are given liquidation priority versus the fund issuer; however, certain funds and products may involve higher issuer credit risk because they are not structured as a registered fund.

**Legislative and Tax Risk**—Performance may directly or indirectly be affected by government legislation or regulation, which may include, but is not limited to: changes in investment advisor or securities trading regulation; change in the U.S. government's guarantee of ultimate payment of principal and interest on certain government securities; and changes in the tax code that could affect interest income, income characterization and/or tax reporting obligations (particularly for ETF securities dealing in natural resources). Fingage does not engage in financial or tax planning, and in certain circumstances a Client may incur taxable income on her investments without a cash distribution to pay the tax due.

**Foreign Investing and Emerging Markets Risk**—Foreign investing involves risks not typically associated with U.S. investments, and the risks may be exacerbated further in emerging market countries. These risks may include, among others, adverse fluctuations in foreign currency values, as well as adverse political, social and economic developments affecting one or more foreign countries. In addition, foreign investing may involve less publicly available information and more volatile or less liquid securities markets, particularly in markets that trade a small number of securities, have unstable governments, or involve limited industry. Investments in foreign countries could be affected by factors not present in the U.S., such as restrictions on receiving the investment proceeds from a foreign country, foreign tax laws or tax withholding requirements, unique trade clearance or settlement procedures, and potential difficulties in enforcing contractual obligations or other legal rules that jeopardize shareholder protection. Foreign accounting may be less transparent than U.S. accounting practices and foreign regulation may be inadequate or irregular.

**ETF Risks, including Net Asset Valuations and Tracking Error**—ETF performance may not exactly match the performance of the index or market benchmark that the ETF is designed to track because 1) the ETF will incur expenses and transaction costs not incurred by any applicable index or market benchmark; 2) certain securities comprising the index or market benchmark tracked by the ETF may, from time to time, temporarily be unavailable; and 3) supply and demand in the market for either the ETF and/or for the securities held by the ETF may cause the ETF shares to trade at a premium or discount to the actual net asset value of the securities owned by the ETF. Certain ETF strategies may from time to time include the purchase of fixed income, commodities, foreign securities, American Depositary Receipts, or other securities for which expenses and commission rates could be higher than normally charged for exchange-traded equity securities, and for which market quotations or valuation may be limited or inaccurate.

Clients should be aware that to the extent they invest in ETF securities they will pay two levels of advisory compensation—advisory fees charged by Fingage plus any management fees charged by the issuer of the ETF. This scenario may cause a higher advisory cost (and potentially lower investment returns) than if a Client purchased the ETF directly.

An ETF typically includes embedded expenses that may reduce the fund's net asset value, and therefore directly affect the fund's performance and indirectly affect a Client's portfolio performance or an index benchmark comparison. Expenses of the fund may include investment advisor management fees, custodian fees, brokerage commissions, and legal and accounting fees. ETF expenses may change from time to time at the sole discretion of the ETF issuer. Fingage discloses each ETF's current information, including expenses, on the Site. ETF tracking error and expenses may vary.

**Inflation, Currency, and Interest Rate Risks** - Security prices and portfolio returns will likely vary in response to changes in inflation and interest rates. Inflation causes the value of future dollars to be worth less and may reduce the purchasing power of an investor's future interest payments and principal. Inflation also generally leads to higher interest rates, which in turn may cause the value of many types of fixed income investments to decline. In addition, the relative value of the U.S. dollar-denominated assets primarily managed by Fingage may be affected by the risk that currency devaluations affect Client purchasing power.

## Form ADV Part 2 Client Brochure

### Item 9 Disciplinary Information

Like all registered investment advisors, Fingage is obligated to disclose any disciplinary event that might be material to any Client when evaluating our services.

We do not have any legal, financial, regulatory, or other “disciplinary” item to report to any Client. This statement applies to our firm and to every employee of our firm.

## **Form ADV Part 2 Client Brochure**

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

Fingage Advisors LLC licenses its investment models from its parent company Fingage Holdings Inc.

## Form ADV Part 2 Client Brochure

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

Fingage Advisors LLC's paramount ethical, professional, and legal duty is to act at all times as a fiduciary to its Clients. This means that Fingage puts the interests of its Clients ahead of its own, and carefully manages for any perceived or actual conflict of interest that may arise in relation to its advisory services. Fingage has adopted a Code of Ethics, which is designed to ensure that we meet our fiduciary obligation to Clients, enhance our culture of compliance within the firm, and detect and prevent any violations of securities laws. Fingage Advisors LLC's Code of Ethics is detailed in a Statement of Policies and Procedures ("Statement"), which establishes standards of conduct for Fingage Advisors LLC's officers and employees ("Supervised Persons" as defined in the Statement) and is consistent with the Code of Ethics requirements of Rule 204A-1 under the Investment Advisers Act of 1940, as amended. The Statement includes general requirements that all Supervised Persons comply with their fiduciary obligations to Clients and applicable securities laws, and specific requirements relating to, among other things, personal trading, insider trading, conflicts of interest, and confidentiality of client information.

Each new Fingage employee receives a copy of the Statement when hired by Fingage Advisors LLC. Fingage sends copies of any amendments to the Statement to all Supervised Persons, who must acknowledge in writing having received the Statement and the amendments. Annually or as otherwise required, each Supervised Person must confirm to Fingage that he or she has complied with the Statement during such preceding period.

Under the Statement, Fingage Advisors LLC's directors and Supervised Persons may personally invest in securities recommended on the Site, specifically the ETFs recommended for each asset class. Transactions in ETFs have been pre-approved for trading by Fingage Advisors LLC's Chief Compliance Officer based on the security's liquidity profile and structural characteristics. Supervised Persons may also buy or sell specific securities for their own accounts that are not purchased or sold for Clients. Fingage monitors the securities transactions of all Supervised Persons and investigates any unusual patterns that it detects. It also requires all Supervised Persons to report any violations of the Statement promptly to Fingage Advisors LLC's Chief Compliance Officer.

## Form ADV Part 2 Client Brochure

### Item 12 Brokerage Practices

Fingage does not recommend or direct any brokerage services.



## Form ADV Part 2 Client Brochure

### Item 13 Review of Accounts

Fingage provides all Clients with continuous access via the Site to reporting information about Account status and optimal recommended portfolios. Clients may also receive periodic e-mail communications describing market performance, Account information, and product features.

Fingage Advisors LLC's software reviews each Client's Account when it is opened, and continuously monitors and periodically rebalances each Client's portfolio to seek to maintain a Client's personalized glide path and optimal return for his/her retirement objective. Fingage also conducts reviews when material changes may have occurred to a Client's portfolio or investment objectives. We consider tax implications and the volatility associated with each of our chosen asset classes when deciding when and how to rebalance.

On a periodic basis, Fingage may contact each Client to remind them to review and update the profile information they previously provided. These notifications and confirmations include a link to the Client's current information and contact information for the Fingage support team. Currently the Fingage team members whose tasks include supervising, arranging and responding to these notifications, confirmations and reviews are: the Chief Compliance Officer with help from Client Services.

Fingage conducts separate reviews related to the ETFs and funds recommended for Client portfolios. These reviews are approved by Fingage Advisors LLC's Investment Committee, which has the authority, if necessary, to take action up to and including the removal, addition or replacement of an ETF or fund from the recommended list.

## Form ADV Part 2 Client Brochure

### Item 14 Client Referrals and Other Compensation

Fingage expects from time to time to run promotional campaigns to attract Clients to open Accounts on the Site. These promotions may include additional Account services or products offered on a limited basis to select Clients, more favorable fee arrangements, and/or reduced or waived advisory fees for Clients.

These arrangements may create an incentive for a third-party or other existing Client to refer prospective Clients to Fingage Advisors LLC, even if the third-party would otherwise not make the referral. These arrangements may also create a conflict of interest for a Client to maintain a certain level of assets managed through Fingage if doing so would result in eligibility to receive an incentive, bonus or additional compensation.

Fingage may also pay pre-determined fees to third-parties for their marketing services to Fingage Advisors LLC, which may be in the form of profit sharing agreements.

Fingage engages solicitors whom it pays for Client referrals. Fingage discloses this practice in writing to the affected Clients and complies with the requirements of Rule 206(4)-3 under the Investment Advisers Act of 1940, as amended, to the extent required by applicable law.

## Form ADV Part 2 Client Brochure

### Item 15 Custody

Fingage does not maintain custody of any Client funds or securities.

## Form ADV Part 2 Client Brochure

### Item 16 Investment Discretion

Discretion over client assets is generally limited to establishing investment allocation percentages in the asset allocation models maintained by Fingage for certain clients.

## Form ADV Part 2 Client Brochure

### Item 17 Voting Client Securities

Due to the nature of the business, Fingage does not vote proxies on behalf of the Clients.

## Form ADV Part 2 Client Brochure

### Item 18 Financial Information

Fingage does not require or solicit the prepayment of any advisory fees, and does not have any adverse financial condition that is reasonably likely to impair our ability to continuously meet our contractual commitments to our Clients.

## FINGAGE ADVISORS LLC

1122 Clay Street  
San Francisco, CA  
[www.Fingage.com](http://www.Fingage.com)

### Form ADV Part 2B Client Brochure Supplement

March 15, 2016

This Brochure Supplement provides information about certain Fingage Advisors LLC employees listed below that supplements the Fingage Brochure you should have received above. Please contact Fingage at (262) 346-4243 or [support@fingage.com](mailto:support@fingage.com) if you did not receive Fingage Advisors LLC's Brochure or if you have any questions about the contents of this Brochure Supplement. Additional information about Samer Habi is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**Samer Habl, born 1975**

Education

American University of Beirut  
B.E. Mechanical Engineering, 1997

Stanford University  
M.Sc. Engineering Economic Systems and Operations Research, 1999

Business Background

1999 –2009 Managing Director, Mellon Capital Management

2010 – 2015 Senior Vice President and Portfolio Manager, Franklin Templeton Investments

2015 – Present Chief Executive Officer and Chief Compliance Officer Fingage Advisors LLC and President Fingage Holdings Inc.

Disciplinary Information

None

Other Business Activity

None

Additional Compensation

None

Supervision

Mr. Habl serves as the president and Chief Investment Officer of Fingage Advisors LLC, and as such is not subject to direct supervision.