



## **FINGAGE ADVISORS LLC**

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

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

### **Client Brochure**

March 6, 2017

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 Advisors LLC is a wholly owned subsidiary of Fingage Holdings Inc.

## Form ADV Part 2 Client Brochure

### Item 2 Material Changes

The following sections have been revised materially:

1. Items 4B and 4E were revised to provide a more detailed description of services.
2. Items 5A and 5B were revised and the fee in section 5A was revised to be up to a maximum of 0.35% of AUM.
3. Item 19 was added to provide detailed disclosures

## 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 .....	7
Item 6 Performance-Based Fees and Side-by-Side Management .....	<b>Error! Bookmark not defined.</b>
Item 6 Performance-Based Fees and Side-by-Side Management .....	9
Item 7 Types of Clients.....	10
Item 8 Methods of Analysis, Investment Strategies and Risk of Loss.....	11
Item 9 Disciplinary Information .....	15
Item 10 Other Financial Industry Activities and Affiliations .....	16
Item 11 Code of Ethics, Participation or Interest in Client Transactions and Personal Trading .....	17
Item 12 Brokerage Practices .....	18
Item 13 Review of Accounts .....	19
Item 14 Client Referrals and Other Compensation.....	20
Item 15 Custody .....	21
Item 16 Investment Discretion .....	22
Item 17 Voting Client Securities.....	23
Item 18 Financial Information.....	24
Item 19 Disclosures.....	25
Form ADV Part 2B Client Brochure Supplement.....	27

## Form ADV Part 2 Client Brochure

### Item 4 Advisory Business

#### A. Firm Information

Fingage Advisors LLC ("Fingage"), established in 2016, is a registered investment adviser registered with the United States Securities and Exchange Commission ("SEC") under the Investment Advisers Act of 1940, as amended. It is a wholly owned subsidiary of Fingage Holdings Inc. ("Fingage Holdings"), a privately held company. Fingage operates the following websites [www.fingage.com](http://www.fingage.com), [www.fingage.net](http://www.fingage.net), [www.fingagecapital.com](http://www.fingagecapital.com), [www.fingage401k.com](http://www.fingage401k.com), [www.fingageadvisors.com](http://www.fingageadvisors.com), [www.fingageadvisers.com](http://www.fingageadvisers.com), [www.fingageadvisors.net](http://www.fingageadvisors.net), and [www.fingageadvisers.net](http://www.fingageadvisers.net) ("Site"). Additional information about Fingage is provided in Fingage's Form ADV part 1, which is available online at <http://www.adviserinfo.sec.gov>.

#### B. Overview of Services

Nothing on Fingage's Site should be construed as a solicitation or offer, or recommendation, to buy or sell any security. Financial advisory services are only provided to investors who become Fingage clients ("Clients") pursuant to a written Client Agreement, which investors are urged to read and carefully consider in determining whether such agreement is suitable for their individual facts and circumstances.

Fingage offers Clients investment advice related to their retirement accounts. The investment advice consists of a diversified portfolio of mutual funds, exchange traded funds (ETFs), or units in separately managed accounts ("Funds"), chosen from the retirement plan's investment options. In addition, Fingage provides Clients with a personalized glide path, and simulated forecasts of wealth and retirement readiness. Fingage will monitor Clients' accounts and either automatically rebalance their portfolio to the most recent recommendation from their respective personal glide path or notify the Clients that they need to manually rebalance their portfolio and provide them with instructions. The services of Fingage taken all together represent a personalized alternative to target date funds.

Fingage's approach builds on modern portfolio theory and incorporates recent advances in asset allocation, risk management, portfolio optimization and retirement planning to provide Clients with optimized goal-based investment strategies. Fingage offers personalized investment management services, which are designed to help Clients achieve their investment objectives with the least risk possible.

Fingage provides investment advice to Clients who are participants in employer-sponsored or public retirement plans through its Online Advisor only. Fingage offers Clients a personalized investment strategy and glide path where exposure to the different asset classes is obtained through the investments options which are made available to them through their retirement plan ("Plan"). The personalized glide path consists of a mix of Funds such as equity, fixed income, or other asset classes. As the investor approaches retirement age, the allocation to growth asset classes such as equity will decline gradually and the allocation to defensive asset classes such as fixed income will increase. The following factors are taken into account when determining the personalized glide path and investment strategy:

age, desired retirement age, wealth, income, and saving rate. Changes to any of these factors may lead to a change in the optimal investment strategy for the investor. A large number of Monte-Carlo simulations (a technique used to model future behavior of stocks and bonds) are used to evaluate the range of outcomes of the different possible investment strategies and the strategy which maximizes the expected wealth of the investor at retirement and minimizes the expected risk of income shortfall is considered to be optimal and is chosen for the investor. These Monte Carlo simulations are based on the investor's financial situation as provided to Fingage by the investor or by his retirement plan on his behalf. In addition, these simulations and the resulting investment advice depend on Fingage's chosen approach and on estimates of expected returns and expected risk of the major asset classes as well as publicly available forecasts of inflation and wage growth over time.

Fingage determines for each client the optimal level of risk tolerance which will maximize the wealth at retirement and minimize the risk of income shortfall based on a large number of Monte-Carlo simulations. Fingage offers Clients the ability to increase or decrease the risk level of their portfolio as well as to revise the information about their financial situation, through the Fingage interactive website portal. Clients may be offered depending on availability an optional service of automatic portfolio rebalancing "Portfolio Rebalance Program". Otherwise, Fingage notifies the Clients that they need to manually rebalance their portfolio and provides them with detailed instructions.

Fingage researches each investment option on the Plan to determine which one is the best representative of each asset class and Fingage creates as diversified a portfolio as possible given the set of Funds (mutual funds, ETFs, separate accounts, or other investment vehicles) available on the plan. The set Funds is not selected by Fingage but by the plan sponsor or plan fiduciary.

Fingage is an Independent Investment Adviser and does not receive any compensation from those who provide or manage the Funds available through the Plan. Fingage charges a fee that is based upon a percentage of plan assets, and/or a flat dollar amount, and/or a percentage of a plan participant's account balance. As such, Fingage has no incentive to direct a Client to invest in one investment option over another. The investment advice provided to a Client is based on the information supplied by the 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 Client, and Fingage's best efforts to evaluate the different investment strategies under Fingage's approach. In rendering Independent Participant Investment Advice to a Client, 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 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 Fingage Holdings 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 Fingage Holdings 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 Fingage Holdings 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 in the near future provide its Investment Advisory service to IRA or taxable individual account holders, where the customized asset allocation strategy is implemented using investment vehicle such as low cost ETFs or mutual funds 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 wealth growth over time.

#### **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 advisory 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 or a Plan's assets. 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. Fees may vary for each Client.

Fingage utilizes the proprietary software from Fingage Holdings Inc. to provide personalized financial advisory services and charges an annualized fee which can be as high as 0.35% on a Client's assets under management. The fee may be significantly lower especially in employer-sponsored or public retirement plans based a number of factor such as the size of the plan and the number of plan participants. Annual fees are charged on a monthly or quarterly basis as explained below.

Fingage Advisors LLC's fees which are not charged as a flat fee are calculated on a continuous basis and deducted from Client Accounts each month or quarter 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 (or quarter) is equal to the total of the daily fees calculated during that month (or quarter) (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 such management fees of the funds used in a Clients' accounts.

The issuer of some of the securities or products we advise Clients to purchase or purchase on their behalf, such as ETFs, mutual funds, units of separate accounts, or other similar financial products ("Funds"), 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. Funds typically includes embedded expenses that may reduce their net asset value, and therefore directly affect their performance and indirectly affect a Client's portfolio performance or an index benchmark comparison. Expenses of Funds may include management fees, custodian fees, brokerage commissions, and legal and accounting fees.

The expenses of Funds may change from time to time at the sole discretion of the Funds' issuers. Fingage discloses each Fund'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. 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 below.

At any time, a Client may terminate an Account.

Investors evaluating Fingage's software based financial advisory service should be aware that Fingage'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 Client 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's electronic communications. Unless noted otherwise on the Site or within this Brochure, Fingage's advisory service, the signature for the Client 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 financial profile such as wealth, salary, overall financial situation, 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 update his or her financial profile on Fingage's site with any changes in his or her financial situation or investment objectives that might trigger a change to her personalized portfolio and glide path.
3. The software based financial advisory service includes preselected Funds for each asset class within the personalized portfolio of a Client. Fingage does not allow Clients to select their own Funds. 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 advisory service, Fingage provides Clients with financial advice that is based on recent advances in asset management which are most appropriate for long-term investing for retirement. We don't rely only on Modern Portfolio Theory (MPT) 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 a single investment period. Investors are faced however with the task of choosing a dynamic asset allocation strategy over their lifetime that will maximize their retirement income while minimizing the risk of income shortfall post retirement given a steady rate of savings. Fingage employs a number of tools for 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. We perform a large number of Monte Carlo simulations based on our capital market expectations and our dynamic risk management to model future behavior of markets including extreme and rare events such as recessions and financial crises. Then based on the Monte Carlo simulations and range of outcomes for each investment strategy, we come up with the optimal personalized glide path. We then use our proprietary research at every point in time to find the most efficient implementation of the asset allocation of the portfolio of the client. Our asset allocation pays special attention to the probability of extreme market moves by utilizing a proprietary Generalized Auto-Regressive Conditional Heteroscedasticity (GARCH) risk model.

Fingage works with existing approved plan investment options such mutual funds, ETFs, separate accounts, or CIT (commingled investment trusts), when providing retirement investment advice and investment portfolios for retirement plan participants.

Fingage reviews on a regular basis the universe of approved Funds on a retirement plan to identify the most appropriate ETFs or fund to represent each asset class. We look for investment options that minimize cost and tracking error and offer market liquidity. Choosing a Fund with a low expense ratio but 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 Funds which are expected to have sufficient liquidity to allow Client withdrawals at any time. Finally, we select Funds that have conservative and shareholder-friendly securities lending policies.

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 or approach 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 the Client's Broker may have difficulty finding a buyer and may be forced to sell at a significant discount to market value. This liquidity risk may be caused by numerous factors, including but not limited to: 1) extreme market volatility, 2) a decision by exchange participants to withhold some or all of their quoted market bids, 3) exchange technical issues or exchange closure, 4) delisted or halted securities, and/or 5) a position across Client accounts that is large relative to the average daily trading volume of the security. Some securities (including mutual funds and 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 mutual funds, 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 mutual funds and ETF securities dealing in natural resources).

**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.

**Fund Risks, including Net Asset Valuations and Tracking Error** – A Fund performance may not exactly match the performance of the index or market benchmark that the ETF, mutual fund, or separately managed account ("Fund") is designed to track because 1) the Fund incurs 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 Fund may, from time to time, temporarily be unavailable; 3) supply and demand in the market for either the Fund and/or for the securities held by the Fund may cause the Fund shares or units to trade at a premium or discount to the actual net asset

value of the securities owned by the Fund; and 4) some Funds will deliberately hold different securities from the ones in the index to express the investment view of the management team.

Certain investment 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 mutual fund or 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 funds. This scenario may cause a higher advisory cost (and potentially lower investment returns) than if a Client purchased the funds directly.

A Fund 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. Fund expenses may change from time to time at the sole discretion of the Fund issuer. Fingage discloses each Fund's current information, including expenses, on the Site. Mutual fund and 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 Code of Ethics and Trading Policy ("Policy"), which establishes standards of conduct for Fingage Advisors LLC's officers and employees ("Supervised Persons" as defined in the Policy) and is consistent with the Code of Ethics requirements of Rule 204A-1 under the Investment Advisers Act of 1940, as amended. The Policy 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 Policy when hired by Fingage Advisors LLC. Fingage sends copies of any amendments to the Policy to all Supervised Persons, who must acknowledge in writing having received the Policy and the amendments. Annually or as otherwise required, each Supervised Person must confirm to Fingage that he or she has complied with the Policy during such preceding period.

Under the Policy, Fingage Advisors LLC's directors and Supervised Persons may personally invest in securities recommended on the Site such as mutual funds or ETFs except when prohibited by the Policy. Employees of Fingage Advisors LLC may not purchase or sell any security, mutual fund, or ETF on a new employer's defined contribution plan line-up for the period starting 2 days prior to the Fingage advisory service going live for plan participants and ending 2 days after the last asset transfer from securities not recommended by Fingage to securities recommended by Fingage. 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 Policy 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. Fingage does not make any representations regarding the execution quality of orders placed with the brokerage partner of the retirement plan.

## 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 or notifies the Client to manually rebalance the portfolio to seek to maintain a Client's personalized glide path and optimal return for his/her retirement objective.

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 may 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 regular reviews related to the Funds recommended for Client portfolios. These reviews are approved by Fingage Advisors LLC's Investment Committee (currently consisting of Samer Habi), which has the authority, if necessary, to take action up to and including the removal, addition or replacement of a 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.

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 may engage 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 exercised by establishing an optimal asset allocation and directing the investment of the assets accordingly with automated rebalancing. Some Clients receive the investment advice of Fingage but manage the assets themselves and for such Clients Fingage doesn't have investment discretion.

## 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.



**Form ADV Part 2 Client Brochure****Item 19 Disclosures****A. General Disclosures**

Nothing on the Fingage's Site or should be construed as a solicitation or offer, or recommendation, to buy or sell any security. Financial advisory services are only provided to investors who become Fingage Clients ("Clients") pursuant to a written Client Agreement, which investors are urged to read and carefully consider in determining whether such agreement is suitable for their individual facts and circumstances.

**B. Performance Disclosures**

PAST PERFORMANCE IS NO GUARANTEE OF FUTURE RESULTS, AND ANY EXPECTED RETURNS OR HYPOTHETICAL PROJECTIONS MAY NOT REFLECT ACTUAL FUTURE PERFORMANCE. FURTHERMORE, PAST RETURNS MAY REFLECT THE PERFORMANCE OF ASSETS FOR A FINITE TIME, OR DURING A PERIOD OF EXTREME MARKET ACTIVITY. ALL INVESTMENTS INVOLVE RISK AND MAY LOSE MONEY. There can be no assurance that an investment mix or any projected or actual performance shown on the Site will lead to the expected results shown or perform in any predictable manner. It should not be assumed that investors will experience returns in the future, if any, comparable to those shown or that any or all of Fingage's Clients experienced such returns.

Performance information is presented net of all management fees and expenses unless marked otherwise. Commissions are not considered since Clients on the Fingage platform are not charged trading commissions. For all periods the performance information includes the reinvestment of dividends and interest unless otherwise noted.

Any comparison to traditional financial advisors is based on an evaluation of average fees and returns. Actual results may be different for each investor and there can be no guarantee of enhanced returns due to additional diversification, mutual fund or ETF selection, or the use of Fingage's investment management service.

Projected and/or hypothetical performance is intended to show only an expected range of possible investment outcomes based on historical average returns and standard deviation of each investment type contained in the investment mix recommended by Fingage, but does not take into consideration the effect of taxes, changing risk profiles, changing savings rate or future investment decisions beyond the glide path which is taken into account. Projected and/or hypothetical performance does not represent actual Client accounts or actual trades and may not reflect the effect of material economic and market factors. The actual transaction costs in Client accounts may be different.

Actual investors on Fingage's site may experience different results from any hypothetical results shown. There is a potential for loss, as well as gain, which is not reflected in the hypothetical information portrayed. The hypothetical performance results shown do not represent the results of actual trading using client assets but were achieved by means of the retroactive application of a model designed with the benefit of hindsight. Investors should carefully review the additional information presented by Fingage as part of any hypothetical comparison.

ANY COMPARISONS TO INDICES ARE PROVIDED FOR ILLUSTRATIVE PURPOSES ONLY. AN INDEX IS A BROADLY DIVERSIFIED, UNMANAGED GROUP OF SECURITIES, WHICH MAY INCLUDE ONLY LARGE

CAPITALIZATION COMPANIES OR COMPANIES OF A CERTAIN SIZE. BROADLY BASED INDICES MAY BE SHOWN ONLY AS AN INDICATION OF THE GENERAL PERFORMANCE OF THE FINANCIAL MARKETS DURING THE PERIODS INDICATED. BECAUSE OF THE DIFFERENCES BETWEEN THE CLIENT ALLOCATIONS AND ANY INDICES SHOWN, WEALTHFRONT CAUTIONS INVESTORS THAT NO INDEX IS DIRECTLY COMPARABLE TO THE PERFORMANCE SHOWN SINCE EACH INDEX HAS ITS OWN UNIQUE RESULTS AND VOLATILITY, AND SUCH INDICES, IF SHOWN, SHOULD NOT BE RELIED UPON AS AN ACCURATE COMPARISON.

The return, composite and performance information shown on the Site uses or includes information compiled from third-party sources, including independent market quotations and index information. Fingage believes the third-party information comes from reliable sources, but Fingage does not guarantee the accuracy of the Site information and may receive incorrect information from third-party providers. Unless otherwise indicated, the information on the Site has been prepared by Fingage and has not been reviewed, compiled or audited by any independent third-party or public accountant.

### **C. ETF Selection Disclosures**

The securities employed in Fingage's Clients 401(k) accounts are chosen from a limited set of mutual funds, ETFs, or other investment vehicles which are available on the plan and which have been selected by the plan sponsor or plan fiduciary.

Although Fingage believes its selection process identifies ETFs and mutual funds with high liquidity, low expenses, and low tracking error, Fingage's selection process does not guarantee the quality of a particular mutual fund or ETF or that it will 1) be profitable, 2) properly track any comparable index, 3) trade in a liquid fashion, or 4) trade at or above its publicly-posted net asset value.

Fingage reserves the right to change at any time the selection of mutual funds, ETFs, or securities that it recommends if, in Fingage's sole discretion, any ETF, security, or mutual fund does not meet requirements for continued listing on the platform. Clients should be aware that changes in the selection of funds or securities employed by Fingage's advisory services may result in the sale of their existing holdings. If such a strategy was applied by the Client in a taxable account, it may subject him or her to additional tax liability.

**FINGAGE ADVISORS LLC**

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

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 [info@fingage.com](mailto:info@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 Hahl, 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 of Asset Allocation Research, Mellon Capital Management

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

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

Certificates

Series 3, 30, 65

Disciplinary Information

None

Other Business Activity

None

Additional Compensation

None

Supervision

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