



Hundredfold Advisors, LLC

Part 2A & 2B for Form ADV: Firm Brochure

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This brochure provides information about the qualifications and business practices of Hundredfold Advisors, LLC - (HFA). If you have any questions about the contents of this brochure, please contact us at 757-463-7797 or mcollins@hundredfoldadvisors.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

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

Item 2 – Material Changes

No material changes.

Currently, our Brochure may be requested by contacting us at (757) 463-7600.

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Item 4 – Advisory Business

A-C - The applicant provides sub-advisory portfolio management services to the Hundredfold Select Alternative Fund which has two share classes. The objective of applicant for these funds will be to achieve consistent rates of return that are in excess of a non-active managed strategy. The applicant strives to avoid participating in declining markets and will strive to participate in rising markets. The applicant will consider the overall risk of the holdings of the portfolio and will affect portfolio protection techniques to preserve the purchasing power of the assets. The primary advisor of the funds will handle the trading of securities.

D – N/A

E-Assets under management FYE 12-31-2020

Discretionary Amount	\$166,800,000
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Discretionary Accounts	1
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Item 5 – Fees and Compensation

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

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

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

Item 7 – Types of Clients

HFA is in a sub-advisory role to one mutual fund only. (fund may have several share classes)

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

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

Item 9 – Disciplinary Information

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

Item 10 – Other Financial Industry Activities and Affiliations

- A. The applicant's managing members are officers of Spectrum Financial, Inc. (SFI) a federally registered investment advisor. SFI provides an AssetMaxx investment program, which recommends, to its clients, funds sub-advised by the applicant. The fees received from this service are paid

directly from the mutual fund company as servicing fees. The applicant will not participate in these fees.

- B. Donated Services – The ownership of the applicant is a public charity (Simple Distribute Charitable Foundation). Because of the charity nature, all services provided by Spectrum Financial, Inc. (an SEC affiliated adviser) are donated to the applicant.

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

- C. The applicant has entered into an incentive agreement with Ceros Financial Services (distributor for the Hundredfold Select Alternative Fund) for specific individual's efforts in the sale of fund mentioned. This arrangement is a sharing arrangement with Advisors Preferred (adviser to Hundredfold Select Alternative Fund) and does not affect fees paid by shareholders.

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

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

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

Item 12 – Brokerage Practices

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

Item 13 – Review of Accounts (A-C)

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

Item 14 – Client Referrals and Other Compensation

N/A

Item 15 – Custody

HFA does not have custody of assets.

Item 16 – Investment Discretion

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

Item 17 – Voting Client Securities

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

Item 18 – Financial Information

N/A

ADV Part 2B

Portfolio Manager (Bio)/ Managing Member

Ralph J. Doudera (YOB: 1946), CEO of Spectrum Financial, is a graduate of New Jersey Institute of Technology where he received an undergraduate degree in Mechanical Engineering (1969) and a Master's of Science in Management and Finance (1972). He was employed as an Account Executive with CIGNA Corporation for 10 years beginning in 1973, where he specialized in investment and estate planning. During this period, Mr. Doudera received his certification as Chartered Life Underwriter (1976) and Chartered Financial Consultant (1979) from the American College. He also has held a Series 7, 24, 63 and 65 securities licenses which he terminated in October 2000. Mr. Doudera manages his personal assets through various brokerage firms and mutual fund companies, which may be invested in similar funds as clients and could be considered a conflict of interest. Mr. Doudera has been investing in many investment vehicles since 1979, but has offered services to the public since 1988 when Spectrum Financial, Inc. was registered as an Investment Advisor under the Investment Advisors Act of 1940. Mr. Doudera's role at Spectrum is Head Portfolio Manager. He oversees all strategy development, trading orders, review of SMAs and The Spectrum Funds.

Mary K. Collins (YOB: 1960), President/Compliance Officer of Spectrum Financial is a graduate of Old Dominion University where she received an undergraduate degree in Business Administration (1982) with a concentration in corporate finance. She was employed with FTA, Inc. (1983) as a financial planner where she earned the Chartered Financial Consultants designation (1988). Ms. Collins began working with Spectrum in 1986. She does not meet directly with clients and is compensated on a salary basis.

Spectrum Financial, Inc. (affiliated advisor):

Christopher Hendrix (YOB: 1969)—Investment Services Team Leader/Assistant Portfolio Manager for Spectrum Advisors Preferred Fund (SAPEX). After graduating from Florida State University in 1991 with a B.A. in Social Science/Economics, Mr. Hendrix became a stockbroker with a large regional brokerage firm in Florida. In 1993, he shifted to a national brokerage firm and later became the founder and Senior Technical Analyst of the technical analysis department. During the eleven year stay, he worked closely with representatives and traders, teaching basic and advanced methods designed to enhance investment returns using charts and statistics. In 1998, Mr. Hendrix earned the Chartered Market Technician designation from the Market Technicians Association. In 2005 he established his own firm publishing daily market commentaries as well being a regular contributor to a national magazine. During this time, he also worked with individuals and institutions, advising matters related to technical analysis trading methods. Mr. Hendrix has developed numerous proprietary indicators and analysis techniques that attempt to enhance portfolio returns in various investments and market cycles. His role at Spectrum Financial is to review market data, trends, sentiment and evaluate investment strategies for effectiveness in meeting the objects of Spectrum's investment philosophy. He does not meet directly with our clients and is compensated on a salary basis. He does hold a securities license through Ceros Financial Services; however, this is not associated with Spectrum Financial's clients who may have assets held by this brokerage firm.

Emily Frazier (YOB: 1991)—Business Development Team. Ms. Frazier graduated from Virginia Tech May 2012 with a degree in Communication: Public Relations/Marketing. Her role at Spectrum primarily is developing and managing Spectrum Financial's marketing activities and services to financial institutions and intermediaries. She does hold a securities license through Ceros Financial Services; however, this is not associated with Spectrum Financial's clients who may have assets held by this brokerage firm. She assists Ceros Financial Services in the sale/promotions of The Spectrum Funds.

CMT – Chartered Market Technician – This program is a certification process in which candidates are required to demonstrate proficiency in a broad range of technical analysis subjects. It is administered by the Accreditation Committee of the Market Technicians Association (MTA), Inc. There are three levels that must be mastered and at least 3 years of employment experience as a professional analyst or investment manager.

CLU – Chartered Life Underwriter – This program is a certification which provides an in-depth knowledge on the insurance needs of individuals, business owners, and professional clients. It is administered by the American College and consist of 8 areas of course study. Recipients must have at least 3 years of employment experience in the areas of insurance/health care or financial services/employee benefits. Recipients must earn 30 hours of continuing education credits every two years unless the designation was earned prior to 6/89.

ChFC – Chartered Financial Consultant – This program prepares the recipients in the area of advanced planning needs for individuals, professionals, and small business owners in the key financial areas of insurance, income taxation, retirement planning, investments, and estate planning. It is administered by the America College and consist of 9 areas of course study. Recipients must earn 30 hours of continuing education credits every two years unless the designation was earned prior to 6/89.