

# ForUsAll Advisors, LLC

This brochure provides information about the qualifications and business practices of ForUsAll Advisors, LLC (herein after “ForUsAll”). If you have any questions about the contents of this brochure, please contact us at 832-524-0085 or by email at [cindy@forusall.com](mailto:cindy@forusall.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or by any State Securities Authority.

You may find information about ForUsAll on the company’s website, [www.forusall.com](http://www.forusall.com). Additional information about ForUsAll is also available at the SEC’s website [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) (select “investment adviser firm” and type in our firm name). The results will provide you with Parts 1, 2 and 3 (Form CRS) of our Form ADV.

We are a registered investment advisor firm. Our registration does not imply any level of skill or training. The oral and written communications we provide to you, including this brochure, are for you to evaluate us. Please use this information as factors in your decision to hire us or to continue our business relationship.

October 19, 2022  
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## ITEM 2 – MATERIAL CHANGES

This brochure, dated March 29, 2022, has been prepared by ForUsAll to meet SEC requirements. This section of the brochure addresses only those “material changes” that have been incorporated since our last delivery or posting of this document on the SEC’s public disclosure website (IAPD) [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

Material Changes –

Since filing our last annual update to this Part 2 of Form ADV on March 29, 2022, changes were made to the brochure as follows:

- Updates in Item 4 to refine the description of ForUsAll’s advisory services;
- Update in Item 4 to reflect the provision of screening services to ForUsAll, Inc. regarding cryptocurrencies made available to plan participants through ForUsAll, Inc.’s Alt401(k) Plan offering;
- Update to Item 5 to reflect fees paid to ForUsAll;
- Update to Item 7 to reflect services provided to ForUsAll Inc. in connection with the Alt401(k) offering; and
- Update to Item 8 to reflect additional risks related to cryptocurrencies and digital assets in connection with the Alt401(k) advice.

From time to time, we will update this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a summary of Material Changes shall be provided to each client annually and if a material change occurs in the business practices of ForUsAll. At minimum, a new brochure will be offered within 120 days of the close of each fiscal year.

At any time, you can view the current Disclosure Brochure on-line at the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can also request a copy of this Disclosure Brochure at any time, by contacting us at (844) 401-2253 or by email at [compliance@forusall.com](mailto:compliance@forusall.com). This Disclosure Brochure is also available through links on the ForUsAll website, links within the Terms of Use, in each institutional client’s client website and above the disclosure frame of the ForUsAll modules.

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## **ITEM 4 – ADVISORY BUSINESS**

### **4a: Firm Description**

ForUsAll was established in November 2012 and is a wholly owned subsidiary of ForUsAll, Inc. (“FUA Inc.”), a privately held company backed by venture capital funding. Additional information about ForUsAll’s structure, officers and investors is provided on Part 1 of ForUsAll’s Form ADV which is available online at <http://www.advisorinfo.sec.gov> or at <http://www.forusall.com>.

ForUsAll’s main office is located in San Francisco, California. Cindy Bloch is the Chief Compliance Officer; Cindy Bloch may be contacted by email at [cindy@forusall.com](mailto:cindy@forusall.com) or by telephone at (832) 524-0085. Justin David Ramirez (David Ramirez) is the Chief Investment Officer.

### **4b: Types of Advisory Services**

#### **Overview of Advisory Services**

ForUsAll provides investment advisory and retirement plan consulting services to employer-sponsored qualified retirement savings plans (“Retirement Plans”), their sponsors (“Plan Sponsors”) and participants (“Participants”). ForUsAll’s services are provided to Retirement Plans, Plan Sponsors and Participants as a component of a bundled service offering provided by FUA Inc.

#### **Retirement Plan Services**

As a component of the bundled service offering provided by FUA Inc. to Retirement Plans and Plan Sponsors, ForUsAll offers consulting and advisory services for Retirement Plans that are designed to assist Plan Sponsors in meeting their obligations (“Retirement Plan Services”), including with respect to selecting investment options available to Participants.

ForUsAll may also provide investment education to Participants either as a group or by providing investment advice directly to Participants.

As part of the Retirement Plan Services, ForUsAll may also assist FUA Inc. in

providing non-advisory, administrative services, including by assisting Plan Sponsors with the enrollment of Participants into the Retirement Plan

ForUsAll's Retirement Plan Services may include the provision of services that constitute fiduciary services under the Employee Retirement Income Security Act of 1974, as amended ("ERISA"), and services that are not fiduciary in nature. When providing ERISA fiduciary services, ForUsAll will perform those services to the Retirement Plan as a fiduciary under ERISA Sections 3(16), 3(21)(A) or 3(38)(B) and will act in good faith and with the degree of diligence, care and skill that a prudent person rendering similar service would exercise under similar circumstances.

ForUsAll offers the following Retirement Plan Services:

- Plan Sponsor –ERISA (3)(38) Fiduciary Services
  - ForUsAll provides discretionary investment advice to Plan Sponsors about investment alternatives available for the Retirement Plan in accordance with the Retirement Plan's investment policies and objectives, under which ForUsAll selects and monitors the Retirement Plan's investment alternatives. For some Retirement Plans, ForUsAll may have the final decision-making authority regarding the selection, retention, and removal of investment options.
  - ForUsAll selects for certain Retirement Plans a qualified default investment alternative ("QDIA") (as defined in U.S. Department of Labor ("DOL") regulations under ERISA Section 404(c)(5)) in which assets of Participants who fail to make an investment election will be invested.
  - ForUsAll creates, in consultation with the Plan Sponsor, an Investment Policy Statement ("IPS") for each Retirement Plan that establishes the investment policies and objectives for the Retirement Plan, and that sets forth the asset classes and investment categories to be offered under the Retirement Plan, as well as the criteria and standards for selecting and monitoring the investments.
- Plan Sponsor – ERISA 3(21) Fiduciary Services
  - ForUsAll provides non-discretionary investment advice to certain Plan Sponsors about investment alternatives available for the Retirement Plan in accordance with the Retirement Plan's investment policies and objectives. In such capacity, ForUsAll will provide advice and monitoring

services regarding the investment alternatives available; however, the Plan Sponsor will make the final decision regarding the initial selection, retention, and removal of investment options for Participants.

- ForUsAll will assist in the development of an IPS for the Retirement Plan. The Plan Sponsor has the ultimate responsibility and authority to establish and to adopt the IPS.
  
- Plan Sponsor – Service as ERISA Section 3(16) and Internal Revenue Code Section 414(g) Plan Administrator
  - When a Retirement Plan elects to receive these services, FUA Inc. or its designee will serve as the Retirement Plan’s plan administrator under ERISA 3(16) and Code Section 414(g). ForUsAll generally will not serve in this capacity.
  - A Retirement Plan also may elect to engage FUA Inc. or ForUsAll to provide other Retirement Plan Services. A full listing of the Plan Administrator and other services to be covered will be included in Schedule A of each Retirement Plan client’s Plan Services Agreement.”
  
- Plan Participant – ERISA Fiduciary Services
  - Participants that use the retirement communication modules (“users”) made available through the bundled service offering who have indicated acceptance of the Terms of Use, which includes links to this Form ADV Part 2, our Form ADV Part 3 (Form CRS), our Privacy Practices, and our Methodology and Sources will become clients of ForUsAll. ForUsAll will provide these Participant clients with non-discretionary investment advice concerning the appropriateness of target date funds. In each case, the Plan Participant makes all final investment decisions.
  - ForUsAll may also provide investment advice to individual Participants through one-on-one consultations or group education.
  
- Plan Sponsor – ERISA Non-Fiduciary Services

As a part of the bundled Retirement Plan Services, ForUsAll may assist FUA Inc. in providing the following non-fiduciary services. ForUsAll will generally not be acting as an ERISA fiduciary in assisting in the provision of such services.

- Assisting Retirement Plan with governance and committee education by reviewing Retirement Plan documents, procedures, participant education and communications (including ERISA 404(c) requirements), and notices to assist in compliance with ERISA regulations and industry best practices.
  - Assisting Plan Sponsors in the performance of their duties by creating an online repository to store and organize key Retirement Plan and fiduciary documents.
  - Assisting in the education of the Participants about general investing principles and the investment alternatives available under the Retirement Plan in accordance with DOL rules.
  - Assisting Plan Sponsors with Retirement Plan enrollment through communication campaigns that explain the benefits of the Retirement Plan. Assisting Plan Sponsors in selecting and monitoring providers of recordkeeping, trust and custodial services to the Retirement Plan.
  - Assisting Plan Sponsors in designing key provisions of their Retirement Plan, including but not limited to, default enrollment strategies, company match formulas, vesting schedules and eligibility criteria.
- Plan Participant – ERISA Non-Fiduciary Services

As a part of the bundled Retirement Plan Services, ForUsAll may assist FUA Inc. in providing the following non-fiduciary services to Participants. ForUsAll will generally not be acting as an ERISA fiduciary in assisting in the provision of such services.

- Educating Participants and other eligible employees about various features of the Retirement Plan.
- Assisting eligible employees with enrollment in their Retirement Plan.
- Assisting Participants with adjustments in their Retirement Plan deferral rates.

In addition to providing investment advisory services to Retirement Plans, Plan Sponsors and Participants, ForUsAll may also provide general educational content about Retirement Plan features and Retirement Plan investments. ForUsAll delivers its general educational and advice content through a series of interactive web-based conversations or modules (“Modules”). Links to the Terms of Use, Privacy Practices and ForUsAll’s Form ADV Part 2 and ADV Part 3 (Form CRS) are included above the disclosure frame of all ForUsAll advice Modules.

## **ForUs 401(k) – Retirement Plan Services**

ForUsAll provides ERISA (3)(38) Fiduciary Services as described above to the ForUs 401(k), a Multiple Employer Plan that was formed by FUA Inc., the ForUs 401(k)'s Principal Sponsor. As the Principal Sponsor to the ForUs 401(k), FUA Inc. is responsible for administrative decisions related to the ForUs 401(k).

Each employer who adopts the ForUs 401(k) (“Adopting Sponsor”) will execute a Joinder Agreement with FUA Inc. (“Joinder Agreement”), which details the ERISA services that will be performed by FUA Inc. or ForUsAll with respect to the Adopting Sponsor and their employees who participate in the ForUs 401(k) “Participants”.

Pursuant to the Joinder Agreement, Adopting Sponsors retain ForUsAll to provide fiduciary and investment advisory services with respect to the ForUs 401(k). ForUsAll, in its discretion, will select investment alternatives to be made available to Participants in accordance with the ForUs 401(k)'s investment policies and objectives, including a QDIA (as defined DOL) regulations under ERISA Section 404(c)(5)), for Participants who fail to make an investment election. ForUsAll will monitor the ForUs 401(k)'s investment alternatives and exercise discretion regarding the retention or removal and replacement of investment options in the ForUs 401(k).

### **Alt401(k) Plan**

ForUsAll provides limited non-discretionary screening services to FUA Inc. in connection with FUA Inc.'s offering of a Digital Asset Window service to the participants in the retirement plans participating in FUA Inc.'s Alt401(k) offering. Specifically, in connection with the Alt401(k) offering, utilizing its Digital Asset Methodology Screen, as requested by FUA Inc., the product manufacturer, ForUsAll evaluates cryptocurrencies to exclude assets that have a higher than usual risk of becoming illiquid because they exhibit high risks of fraud, have no known use-cases and that have a high likelihood of being deemed unregistered securities as generally understood today. ForUsAll provides the screen results to FUA Inc. Plan Sponsors then determine whether to make the Digital Asset available to their Plan participants. In addition to these services, ForUsAll provides certain non-advisory services to FUA Inc. in connection with the Digital



Asset Window, including selecting and monitoring certain Digital Asset Window service providers.

Neither ForUsAll nor FUA, Inc. is responsible for, or provides any investment advice regarding (i) whether the Client should offer, or continue to offer, a Digital Asset Window, (ii) whether there should be a limit on the portion of a Plan participant's account balance that may be invested in crypto currency through the Digital Asset Window or the size of any such limits, (iii) whether a Plan participant should invest through the Digital Asset Window, or (iv) a Plan participant's investments through the Digital Asset Window

#### **4c: Client-Tailored Relationships and Restrictions**

As a fiduciary, ForUsAll always acts in our clients' best interests. When ForUsAll provides non-discretionary advisory services, the client is under no obligation to act upon recommendations made by ForUsAll or its associated persons.

#### **4d: Wrap Fee Program**

ForUsAll does not sponsor a wrap fee program.

#### **4e: Assets under Management (AUM)**

As of September 30, 2022 ForUsAll managed \$1,400,000,000 in assets through its ERISA fiduciary services.

## **ITEM 5 – FEES AND COMPENSATION**

### **5a: Fee Schedules**

In general, fees for ForUsAll's investment advisory services are based upon a percentage of assets under management and are typically a component of the fee paid by Retirement Plans or their Plan Sponsors for the FUA Inc. bundled service offering. The fees paid by a Retirement Plan or its Plan Sponsor are negotiable and set forth in the agreement between the Retirement Plan or the Plan Sponsor and FUA Inc. or ForUsAll. The specific manner in which fees are charged is established in the client's written agreement. Expenses such as travel and notice delivery fees may be billed separately to clients at cost, unless otherwise agreed to in the advisory agreement.

Plan Sponsor Clients can be billed for Notice Delivery Services in cases where ForUsAll mails required disclosures to Retirement Plan Participants.

## **Fees for Retirement Plan Services**

The fees for FUA Inc.'s bundled Retirement Plan Services offering are paid from plan assets or via direct invoice quarterly in arrears. Each quarterly period is referred to as the "Billing Period." Plan assets are valued on the last day of each quarter and, for the purpose of calculating the fees, do not include any Excluded Assets (as defined in the applicable agreement) or, if applicable, assets held in the Digital Asset Window (see below for fees associated with the Digital Asset Window). Fees are expressed in terms of either dollars or "basis points" or "bps." One basis point is equal to 1/100th of 1%.

Fees FUA Inc. for the bundled Retirement Plan Services generally are as follows:

- A monthly base fee of up to \$120 per Retirement Plan;
- A per Participant fee of up to \$6 per month; and
- An asset based fee of up to 0.50% annually.

Of the amounts described above, ForUsAll is allocated a portion for its investment advisory services as follows:

- A monthly base fee of up to \$20 per Retirement Plan;
- A per Participant fee of up to \$4.25 per month; and
- An asset based fee of up to 0.40% annually (0.50% for the ForUs 401(k)).

Fees will be billed directly to the Plan Sponsor at the end of Billing Period. The asset based fee may be paid to FUA Inc. by the Retirement Plan recordkeeper directly from Retirement Plan assets, accounts or investments. Alternatively, the asset based fee may be billed directly to the Plan Sponsor.

Certain Plan Sponsor clients are charged a minimum revenue fee of \$2,500 per year as part of the Retirement Plan Services. ForUsAll will not receive any additional compensation from such fee.

Plan Sponsor Clients may be charged an onsite fee of \$1,000.

## **Digital Asset Window Fees:**

ForUsAll does not receive any additional fee for the services provided to FUA Inc. with respect to the Digital Asset Window. However, FUA Inc. and the crypto currency service providers do. When a Client chooses to include the Digital Asset Window in the Plan, in addition to the fees described above, FUA, Inc. and the digital asset vendors will charge Plan participants who use the Digital Asset Window an asset-based fee and a transaction fee. The asset-based fee is 1% annually, charged as .25% quarterly on the assets held in the Plan participants' Digital Asset Window, including USD Coin, on the last day of the prior quarter. The transaction fee will range from .04 -.50% of the cost of the crypto currency being purchased or sold for each trade. A Plan participant's transaction fees will be dependent on the total volume of trades placed by the FUA Inc's clients the previous month. The fees are earned by FUA, Inc. and the crypto currency vendors. FUA Inc's portion of the asset-based fee is determined as follows: 1% annually less .20% or .30% annually depending on the average daily value of all digital assets held by FUA Inc.'s clients for the prior month. Neither ForUsAll nor FUA, Inc. earns any portion of the transaction fees.

### **Asset Based Fees:**

Asset-based fees will generally be calculated as follows:

- The initial fee will be prorated based upon the number of days remaining in the initial quarterly period from the date of execution of the Agreement.
- The initial fee will be based upon the market value of the Retirement Plan assets at the close of business on the last business day of the initial quarterly period.
- Thereafter, the quarterly portion of any annual asset-based fees will be based upon the market value of the Retirement Plan assets at the close of business on the last business day of the previous calendar quarter (without adjustment for anticipated withdrawals by Plan Participants or beneficiaries or other anticipated or scheduled transfers or distributions of assets.)
- When the Agreement is terminated prior to the end of a quarter, ForUsAll will be entitled to a quarterly fee, prorated for the number of days in the quarter prior to the effective date of the termination, and for asset-based fees, based on the market value of the Retirement Plan assets at the close of business on the effective date of termination.

### **5b: Fee Payments Options**

The fees for Retirement Plan Services may be paid by the Retirement Plan recordkeeper directly from Retirement Plan assets, accounts or investments. Alternatively, fees for Retirement Plan services may be billed to the Plan Sponsor.

### **5c: Third Party Fees**

Clients are responsible for the payment of all third party fees (i.e. custodian fees, mutual fund fees and expenses, transaction fees, etc.). Those fees are separate and distinct from the fees we charge.

Mutual fund fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, and a 12b-1 fee, in some cases.

All brokerage commissions, stock transfer fees, and other similar charges incurred in connection with our recommendations will be paid out of the assets in the account.

### **5d: Termination**

Either ForUsAll or Plan Sponsors can terminate their Advisory Agreement, Plan Services Agreement or Joinder Agreement upon receipt of written notice to the other party.

When an agreement is terminated, ForUsAll will refund any pre-paid, unearned fees. Refunds will be made within 30 calendar days of the effective date of termination.

### **5e: Other Investment Compensation**

ForUsAll does not accept commission for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds.

## **ITEM 6 – PERFORMANCE BASED FEES AND SIDE-BY-SIDE MANAGEMENT**

ForUsAll does not charge advisory fees on the performance of funds or securities in your account.

## **ITEM 7 – TYPES OF CLIENTS**

ForUsAll provides investment and non-investment consulting services to Retirement Plans sponsored by corporations, not for profit organizations, governmental entities and participants of these Retirement Plans.

ForUsAll provides investment advisory and investment education services to retirement plan Participants and employees of the Sponsors of its retirement plan clients. ForUsAll provides non-discretionary investment advisory services to FUA Inc, in connection with the selection of crypto currencies to be made available in the Digital Asset Window. ForUsAll also provides non-advisory services to FUA Inc. in connection with the selection and monitoring of service providers in connection with the Digital Asset Window as part of the Alt401(k) offering.

## **ITEM 8 – METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS**

### **8a: Analysis**

ForUsAll uses multiple sources of information to formulate analysis and strategies. They include sources such as financial newspapers, financial magazines, research prepared by others, financial data, prospectuses, annual reports, financial statements and filings with the SEC. ForUsAll cannot guarantee that these sources of information are free from error.

### **8b: Investment Strategies**

When our client is a Retirement Plan or Plan Sponsor, we will construct a prudent investment lineup for the sponsored Retirement Plan based on information derived from conversations with the client and the Retirement Plan's documents, which typically includes an investment policy statement. In determining the investment alternatives for the Retirement Plan, ForUsAll considers the universe of investments available to 401(k) plans on open architecture recordkeeping platforms. Factors considered include: expense ratios, historical investment performance, asset class exposures, expected returns and volatility. Once the investment lineup is created, we will monitor the investments in the Retirement Plan and primarily advise with respect to assets allocated to mutual funds, bank collective trust funds, and exchange traded funds.

In connection with services provided to FUA Inc. regarding the crypto currencies to be made available through the Digital Assets Window, ForUsAll, acting through its FUA Cryptocurrency committee evaluates cryptocurrencies to exclude those that exhibit high risks of fraud, have no known use-cases and that have a high

likelihood of being deemed unregistered securities as generally understood today. ForUsAll provides the result of its screen to FUA Inc. Plan Sponsors determine whether to make the Digital Asset Window available to their Plan participants. In providing this service, the Committee seeks to identify available digital assets that meet minimum investability standards. The Committee does not seek to identify digital assets that it believes will outperform, rather the goal is to exclude purely speculative assets that have no or limited use cases; and assets that carry obvious potential for fraud or other significant related risks.

### **8c: Risk of Loss**

All investments include a risk of loss. In addition, as recent global and domestic economic, health, and pandemic events have indicated, performance of any investment is not guaranteed. As a result, there is a risk that the target date fund, and any other investments we recommend for a Retirement Plan may lose value.

We use our best efforts and expertise to make our recommendations. However, we cannot guarantee any level of performance or that you will not experience financial loss.

ForUsAll will use our best judgment and good faith efforts in rendering services to you. We cannot warrant or guarantee any particular level of account performance, or that the account will be profitable over time. Not every investment decision or recommendation made by us will be profitable. You assume all market risk involved in the investment of your Retirement Plan account's assets under the Investment Advisory Agreement and understand that investment recommendations made for this account are subject to various market, currency, economic, political and business risks. Except as may otherwise be provided by law, we will not be liable to you for (a) any loss that you may suffer by reason of any investment recommendation made or other action taken or omitted in good faith by ForUsAll with that degree of care, skill, prudence and diligence under the circumstances that a prudent person acting in a fiduciary capacity would use. Nothing in this document shall relieve us from any responsibility or liability we may have under state or federal statutes.

### **Mutual Funds/Collective Investment Trusts**

An investment in any pooled investment vehicle including Mutual Funds and Collective Investment Trusts involves risk, including the loss of principal. Mutual

Fund shareholders and investors within Collective Investment Trusts are necessarily subject to the risks stemming from the individual issuers of the fund or trust's underlying portfolio securities.

**Digital assets, often have uncertain regulatory positions now and in the future.**

As digital currencies have grown in popularity, certain U.S. regulatory agencies, such as the Financial Crimes Enforcement Network (“FinCEN”) and the Commodity Futures Trading Commission (“CFTC”), have begun to examine digital currencies and the operations of the related networks. Regulators can consider some as securities and other digital asset constructions as not securities; and regulation and enforcement efforts can depend on the scope of the definition of securities.

Therefore, digital currencies currently face an uncertain regulatory landscape in not only the United States but also in many foreign jurisdictions such as the European Union. Various foreign jurisdictions can adopt laws, regulations or directives that affect digital currency networks and their users. Such could conflict with those of the United States and could negatively impact the acceptance of digital currencies by users, merchants, and service providers outside of the United States and may therefore impede the growth of the digital currency economy. The effect of any future regulatory change on client investments is difficult to predict, but such change could be substantial and adverse.

Unlike bank deposits or securities accounts respectively, digital currencies are not subject to Federal Deposit Insurance Corporation (“FDIC”) or Securities Investor Protection Corporation (“SIPC”) protections; therefore, deposits held with or assets held by clients are not subject to the protections enjoyed by depositors with FDIC or SIPC member institutions. While private insurance may be available at times, the undivided interest in client digital currencies are not insured.

**Digital currencies present additional specific risks.**

There is no central marketplace for digital currency exchange. Supply is determined by a computer code, not by a central bank, and prices/valuations can be extremely volatile. Digital currency exchanges have been closed due to fraud, regulatory changes, failure, and/or or security breaches, for example. Digital

currency exchanges can suspend or limit trading, and governmental authorities can shut down or enact regulations that make such operations untenable. A suspension or limitation of trading could render it impossible for the client to liquidate a position or positions in a timely manner. A delay in exiting a position or positions could expose the client to losses, which could increase as the delay continues. In instances of closure or suspension, the customers of such digital currency exchanges are likely not compensated or made whole for the partial or complete losses of their account balances.

Digital currencies require possession of unique private keys relating to the addresses in which the digital currencies are held. Private keys control movement of the currencies. The theft, loss, and/or destructions of a private key required to access a digital currency is generally irreversible. Any loss of private keys relating to digital wallets used to store a client's digital currencies could result in the loss of the digital currencies controlled by such private key.

**Several factors affect the price of digital currencies.**

There can be no assurance that digital currencies will develop or maintain long-term value. Also, values are highly volatile and can increase or decrease significantly over very short periods of time. Digital currencies are created, issued, transmitted, and stored according to protocols run by computers in the digital currency network. The protocols and the networks have vulnerabilities including that there can be hidden flaws or attacks against them which could result in the loss of some or all of plan participant assets.

Countries could take regulatory actions in the future that severely restricts the right to acquire, own, hold, sell, or use digital currencies or to exchange digital currencies for fiat currency. Such an action may restrict client ability to hold or trade digital currencies and could result in termination and liquidation of the client account at a time that is disadvantageous to its investors or could otherwise adversely affect the client's investment.

**Digital currencies trading is volatile, speculative, and involves a high degree of risk.**

A significant portion of the demand for digital currencies is generated by speculators and investors seeking to profit from the short or long-term holding of digital currencies. The relative lack of acceptance of digital currencies in the retail and commercial marketplace limits the ability of end-users to pay for goods and



services with digital currencies. A lack of expansion by digital currencies into retail and commercial markets, or a contraction of such use, also results in increased volatility. These investments are relatively new and untested and as such are prone to risks.

Global financial markets have experienced and may continue to experience significant volatility resulting from a novel strain of coronavirus known as COVID-19 (COVID-19). The outbreak of COVID-19 has resulted in travel restrictions, quarantines, supply chain disruptions, lower consumer demand and general market uncertainty. The effects of COVID-19 have and may continue to adversely affect the global economy, which may materially and adversely impact the value and performance of the mutual funds held in client accounts.

### Cybersecurity

The computer systems, networks and devices used by ForUsAll and service providers to us and our clients to carry out routine business operations employ a variety of protections designed to prevent damage or interruption from computer viruses, network failures, computer and telecommunication failures, infiltration by unauthorized persons and security breaches. Despite the various protections utilized, systems, networks, or devices potentially can be breached. A client could be negatively impacted as a result of a cybersecurity breach. Cybersecurity breaches can include unauthorized access to systems, networks, or devices; infection from computer viruses or other malicious software code; and attacks that shut down, disable, slow, or otherwise disrupt operations, business processes, or website access or functionality. Cybersecurity breaches may cause disruptions and impact business operations, potentially resulting in financial losses to a client; impediments to trading; the inability by us and other service providers to transact business; violations of applicable privacy and other laws; regulatory fines, penalties, reputational damage, reimbursement or other compensation costs, or additional compliance costs; as well as the inadvertent release of confidential information.

Similar adverse consequences could result from cybersecurity breaches affecting issuers of securities in which a client invests; governmental and other regulatory authorities; exchange and other financial market operators, banks, brokers, dealers, and other financial institutions; and other parties. In addition, substantial costs may be incurred by these entities to prevent any cybersecurity breaches in the future

## **ITEM 9 – DISCIPLINARY INFORMATION**

### **9a: Civil or Criminal Actions**

ForUsAll has no Civil or Criminal Actions to disclose. ForUsAll and its managers have never been found guilty, convicted or plead no contest to a criminal or civil action in a domestic, foreign or military court.

### **9b: Administrative Enforcement Proceedings**

ForUsAll has no Administrative Enforcement Proceedings to disclose. ForUsAll and its managers have never been found by the SEC, any other state or federal agency or any foreign regulatory agency to have caused loss of the ability of an investment-related business to do business or been sanctioned, barred or limited in investment-related activities.

### **9c: Self-Regulatory Organization Enforcement Proceedings**

ForUsAll has no Self-Regulatory Organization Enforcement Proceedings to disclose. ForUsAll and its managers have never been found by a self-regulatory agency to have caused loss of the ability of an investment-related business to do business. Additionally, ForUsAll and its managers have never been found in violation of self-regulatory agencies rules such that they were barred, suspended, limited in advisory functions or fined.

## **ITEM 10 – OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS**

### **10a: Broker Dealers and Registered Representatives**

ForUsAll is not registered as a broker-dealer and our employees are not registered representatives of any broker-dealer.

### **10b: Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor**

Neither ForUsAll nor our employees hold any of the above registrations.

### **10c: Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests**

Neither ForUsAll nor our employees have any business or other relationships that are material to ForUsAll or that raise material conflicts of interest.

ForUsAll will disclose any material conflict of interest relating to ForUsAll, our representatives, or any of our employees that could reasonably be expected to impair the rendering of unbiased and objective advice.

#### **10d: Selection of Other Advisors and How this Advisor is Compensated for those Selections**

ForUsAll does not select other advisors.

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

#### **11a: Code of Ethics Description**

ForUsAll has adopted a Code of Ethics and Insider Trading Policy that governs a number of potential conflicts of interest that can arise when we provide our advisory services to you. This Code of Ethics and Insider Trading Policy sets forth high ethical standards of business conduct required of our employees, including compliance with applicable federal securities laws and is designed to ensure we meet our fiduciary obligation to you. A complete copy of our Code of Ethics and Insider Trading Policy will be supplied to you, free of charge, if you request it by email sent to [info@forusall.com](mailto:info@forusall.com).

The ForUsAll Code of Ethics and Insider Trading Policy is distributed to each employee at the time of hire, annually thereafter and when revisions are made. We also supplement the Code of Ethics and Insider Trading Policy with annual training and on-going monitoring of employee activity. A complete copy of our Code of Ethics and Insider Trading Policy will be supplied to you, free of charge, if you request it.

The ForUsAll Code of Ethics and Insider Trading Policy is designed to assure that the personal securities transactions, activities and interests of ForUsAll employees and investment adviser representatives (“IARs”) will not interfere with (i) making decisions in the best interest of investment advisory clients, and (ii) implementing such decisions, while at the same time allowing employees and IARs to invest or their own accounts. ForUsAll’s Code of Ethics requires the review of quarterly securities transactions reports of its IARs, and initial and annual securities holdings reports. These reports must be submitted to ForUsAll by IARs quarterly and annually. IARs may buy or sell for their personal account securities identical to or different from those recommended to clients.

ForUsAll’s Code of Ethics includes the firm’s policy prohibiting the use of material non-public information. All employees and IARs are reminded that such non-public information may not be used in a personal or professional capacity.

Among other matters, ForUsAll’s Code of Ethics requires the prior approval of any acquisition of securities in a limited offering (e.g., private placement) or an initial public offering (“IPO”). The Code of Ethics also provides for oversight, enforcement and record keeping provisions.

On an annual basis, we require all employees to re-certify to our Code of Ethics, identify members of their household and any account to which they have a beneficial ownership (they “own” the account or have “authority” over the account), securities held in certificate form and all securities they own at that time

## **ITEM 12 – BROKERAGE PRACTICES**

ForUsAll does not select or recommend broker-dealers for clients’ transactions. We do not have any formal or informal soft-dollar arrangement and do not receive any soft-dollar benefits.

## **ITEM 13 – REVIEW OF ACCOUNTS**

ForUsAll conducts account reviews on an ongoing basis, with the frequency determined by agreement with the client. ForUsAll’s Investment Committee reviews 3(38) Client portfolios on a quarterly basis to ensure investment performance adheres to the goals outlined in each Client’s Investment Policy Statement.

## **ITEM 14 – CLIENT REFERRALS AND OTHER COMPENSATION**

### **14a: Economic Benefits Provided by Third Parties for Advice Rendered to Clients**

ForUsAll does not receive economic benefit from Third Parties for Advice Rendered to Clients.

### **14b: Compensation to Non-Advisory Personnel for Client Referrals**

ForUsAll compensates other persons or firms, including, but not limited to third-party writers or bloggers, who generate leads for demonstrations of our services as well as client referrals (“Referral Agents”) for client referrals. When ForUsAll compensates Referral Agents, ForUsAll enters into an agreement with such Referral Agents and pays them a portion of the ForUsAll advisory fee. When

applicable, the Referral Agent will disclose to Client at the time of the solicitation the arrangement and compensation to be received by the Referral Agent and will provide Client with a copy of the solicitor disclosure statement containing the details of the compensation received by the Referral Agent for the referral.

## **ITEM 15 – CUSTODY**

ForUsAll does not maintain custody of any client funds or securities.

## **ITEM 16 – INVESTMENT DISCRETION**

ForUsAll does not have discretionary authority in regard to any client assets unless we are engaged as an ERISA 3(38) fiduciary as described above.

In this latter capacity, ForUsAll selects the funds to be included in a Retirement Plan's investment lineup; however, ForUsAll does not exercise any discretion with respect to allocation by Participants in the investment lineup.

## **ITEM 17 – VOTING CLIENT SECURITIES**

ForUsAll does not vote the proxies for our client's securities. Clients will receive proxies or other solicitations directly from their custodian. We do not provide advice with respect to proxies or other particular securities solicitations.

## **ITEM 18 – FINANCIAL INFORMATION**

### **18a: Balance Sheet**

ForUsAll is not required to include a balance sheet for its most recent financial fiscal year.

### **18b: Financial Conditions**

ForUsAll has no financial issues that could impair our ability to carry out our fiduciary duty to our clients.

### **18c: Bankruptcy Petition**

ForUsAll has never been the subject of a bankruptcy petition.