

Introduction

Values First Advisors, Inc. is registered with the US Securities and Exchange Commission as an Investment Adviser. You have a choice among different types of financial services professionals to assist you with your financial needs. Brokerage and investment advisory services and fees differ, and it is important for you to understand these differences. Free and simple tools are available to research firms and financial professionals at www.investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisers, and investing.

What investment advisory services and advice can you provide me?

We provide investment advisory services to retail investors. As a registered investment adviser, we are held to what is known as a fiduciary standard, which covers our entire investment advisory relationship with you. The standard requires our constant commitment to our duty of loyalty and care to you, our client.

Financial Planning: Our financial planning services may address one or more areas of your financial situation including, but not limited to, cash management, risk management, insurance, education funding, goal setting, retirement planning, estate and charitable gift planning, tax planning, and capital needs planning.

Financial Consulting: We offer financial consulting services for clients who need a professional resource for investment-related questions and periodic reviews of their investment portfolio. We do not monitor or supervise your portfolio in this arrangement. As an additional service, we will place trades in your account(s), but only with your prior authorization.

Core Asset Allocation: At the outset of our relationship, we spend time with you to gain an understanding of your investment goals, risk tolerance and financial situation. We then develop an asset allocation plan designed to meet your investment objectives, using appropriate asset classes and sectors of the market, including a suitable level of diversification. Once the asset allocation plan has been determined, it needs to be effectively implemented. This means selecting the specific securities in which to invest your money. We typically choose from a wide variety of investment types to complete your portfolio.

We also manage a select group of proprietary model asset allocation portfolios that are used in client accounts, when appropriate. In addition, we may select from among a variety of money managers (“sub-advisers”) to advise or manage all or a portion of your portfolio. These particular services are made available through Folio Institutional, an automated investment program offered by Folio Investments, Inc., a licensed broker-dealer and custodian.

As part of our standard services, we regularly monitor your portfolio and continuously review the investments used in our clients' accounts. We intend to communicate with you at least annually, or based on your preference, to discuss your portfolio and our general market views.

We will manage your investment portfolio on a discretionary or a non-discretionary basis. When you choose a discretionary arrangement, we will have the authority to buy and sell securities in your account(s) without asking you in advance. Under a non-discretionary arrangement, we will provide you investment recommendations, but you ultimately decide what investments to buy and sell. You will sign an advisory agreement giving us the type of authority you prefer, which will last until either you or we terminate that agreement. In either arrangement, you must approve the overall allocation to be employed in your account(s) and the percentage of assets (if any) to be placed in our proprietary models prior to implementation and whenever changes are made.

More detailed information on our services is available in our Form ADV Part 2A (our “Brochure”) in Items 4, 7, 13, and 16. We are here to help you and encourage you to ask us questions. For example, you might want to ask us:

- *Given my financial situation, should I choose an investment advisory service? Why or why not?*
- *How will you choose investments to recommend to me?*
- *What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?*

What fees will I pay?

Financial Planning fees are either fixed fee or assessed on an hourly basis, based on the scope of services requested.

Financial Consulting fees include a fixed annual retainer fee and hourly fees are assessed when services are provided.

Our Core Asset Allocation fees are calculated as a percentage of the assets we manage for you, and are billed monthly in arrears. The minimum allocation fee is \$100 per month for your portfolio.

Folio Institutional: If we implement one or more of our model portfolios or utilize the services of a sub-adviser to manage your account, you will pay a separate fee to us or the sub-adviser, which is in addition to our Core Asset Allocation fees. These fees are calculated as a percentage of your assets under management and are billed monthly in arrears.

In addition to the fees that we charge, your portfolio will incur other expenses. The most common examples are brokerage transaction fees (e.g., the fee that the broker charges to buy or sell a security) custodian fees for wire transfers and other administrative services, and the internal fees and expenses assessed by mutual funds and exchange traded funds. If your account is held at Folio Institutional, you will pay an asset-based percentage fee for its custodial and transaction services. In limited instances, Folio Institutional may also impose a transaction fee for certain trades.

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.

More information is available in our Form ADV Part 2A (our “Brochure”) in Items 5 and 12. Please ask us:

- *Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?*

What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?

When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide to you. Here are some examples to help you understand what this means.

- If all or a portion of your assets is allocated to our model portfolios available through the Folio Institutional program, you will pay an additional asset-based fee to us. The receipt of additional compensation creates an incentive for us to recommend our model portfolios rather than our other management services or those of a sub-adviser.
- Our asset management fees are calculated as a percentage of the assets we manage for you. This type of fee arrangement could influence us to recommend that you deposit more assets in your account.
- Our firm’s financial professionals include licensed insurance agents who sell insurance products for a commission. They have an incentive to recommend insurance products to you in order to increase their compensation.

More information is available in our Form ADV Part 2A (our “Brochure”) in Items 10, 11 and 12. Please ask us:

- *How might your conflicts of interest affect me, and how will you address them?*

How do your financial professionals make money?

Certain of our financial professionals are paid a salary and receive a share of client revenue. Financial professionals who are owners of the firm receive their share of revenues and firm profits. The receipt of compensation based on revenue or profits could influence us to recommend that you increase the assets that we manage.

Certain individuals associated with the firm are also licensed insurance agents and as such, they are entitled to receive commissions or other payments on the sale of insurance products. This is a conflict as described above.

Do you or your financial professionals have a legal or disciplinary history?

No. We encourage you to visit www.Investor.gov/CRS for a free and simple search tool to research us and our financial professionals. You might want to ask us:

- *As a financial professional, do you have any disciplinary history? For what type of conduct?*

Additional information

Please refer to our Brochure for more details on our investment advisory services and other topics. Please call us at (877) 832-3847 or email info@valuesfirst.com to request up-to-date information and a copy of the Client Relationship Summary and/or Brochure. We encourage you to ask:

- *Who is my primary contact person? Is he or she a representative of an investment adviser or broker dealer? Who can I talk to if I have concerns about how this person is treating me?*