Firm Brochure
(Part 2A of Form ADV)

401 Advisor, LLC
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This brochure provides information about the qualifications and business practices of 401 Advisor, LLC. If you have any questions about the contents of this brochure, please contact us at: 937-434-1790 , or by email at: wdeshurko@401advisor.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 401 Advisor, LLC is available on the SEC's website at www.adviserinfo.sec.gov

March 31, 2011

Material Changes

Annual Update

The Material Changes section of this brochure will be updated annually when material changes occur since the previous release of the Firm Brochure.

Material Changes since the Last Update

The U.S. Securities and Exchange Commission issued a final rule in July 2010 requiring advisers to provide a Firm Brochure in narrative “plain English” format. The new final rule specifies mandatory sections and organization.

Full Brochure Available

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at: 937-434-1790 or by email at: support@401advisor.com.

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Advisory Business

Firm Description

401 Advisor, LLC, (“FIRM NAME”) was founded in 1994.

401 Advisor, LLC provides personalized confidential financial planning and investment management to individuals, pension and profit sharing plans, trusts, estates, charitable organizations and small businesses. Advice is provided through consultation with the client and may include: determination of financial objectives, identification of financial problems, cash flow management, tax planning, insurance review, investment management, education funding, retirement planning, and estate planning.

401 Advisor, LLC is strictly a fee-only financial planning and investment management firm. The firm does not sell annuities, insurance, stocks, bonds, mutual funds, limited partnerships, or other commissioned products. The firm is affiliated with WRP Investments, Inc that does sell financial products and securities. No commissions in any form are accepted by 401 Advisor, LLC. However, if a commission is paid for the sale of a security or financial product through WRP Investments, Inc. that commission may be used to partially or fully offset the normal fee(s) charged by 401 Advisor, LLC. William DeShurko is also licensed to sell insurance as an independent insurance agent.

A conflict of interest may arise between the Advisor’s role as a fee based Investment Advisor and as a commissioned Registered Representative of WRP Investments, Inc. or as an insurance agent. It is the opinion of our firm that in most instances clients are better serves in a fee based relationship. When a commission is paid up front by an investment company there is, in general, a lower incentive to provide ongoing service. There is also a potential conflict as some commission products pay higher commissions than others. However, some products and features of certain products are not available to the consumer without a commission structure. In addition, some accounts, particularly smaller accounts with very little turnover are more cost effective in a commissioned structure. Clients should be clear as to whether they are entering into a fee agreement or are paying a commission for service.

No finder’s fees are accepted.

Investment advice is an integral part of financial planning. In addition, 401 Advisor, LLC advises clients regarding cash flow, college planning, retirement planning, tax planning and estate planning.

Investment advice is provided on a discretionary basis by the advisor. 401 Advisor, LLC does not act as a custodian of client assets. The client always maintains asset control. 401 Advisor, LLC places trades for clients under a limited power of attorney.

For clients who elect to receive financial planning advice, a written evaluation of each client's initial situation is provided to the client, often in the form of a net worth statement. Periodic reviews are also communicated to provide reminders of the specific courses of action that need to be taken. More frequent reviews occur but are not necessarily communicated to the client unless immediate changes are recommended.

For clients electing investment management services, reviews are at the discretion of the client. All portfolios are continually monitored by the advisor.

Other professionals (e.g., lawyers, accountants, insurance agents, etc.) are engaged directly by the client on an as-needed basis. Conflicts of interest will be disclosed to the client in the unlikely event they should occur.

The initial meeting, which may be by telephone, is free of charge and is considered an exploratory interview to determine the extent to which financial planning and/or investment management may be beneficial to the client.

Principal Owners

William E, DeShurko is a 100% partner and managing member of 401 Advisor, LLC.

Types of Advisory Services

401 Advisor, LLC provides investment management services, also known as asset management services; manages investment advisory accounts not involving investment supervisory services; furnishes investment advice through consultations. Portfolio information and general market oriented information is provided quarterly along with quarterly billing statements. Periodic newsletters are also provided via email delivery.

On more than an occasional basis, 401 Advisor, LLC furnishes advice to clients on matters not involving securities, such as financial planning matters, taxation issues, and trust services that often include estate planning.

As of 12/31/2010, 401 Advisor, LLC manages approximately $29,899,569 in assets for approximately 248 client accounts. Approximately $29,681,305 is managed on a discretionary basis, and $218,264 is managed on a non-discretionary basis.

Tailored Relationships

The goals and objectives for each investment portfolio are documented in our client relationship agreement. Investment policy statements are created that reflect the stated goals and objective. Clients may not impose restrictions on investing in certain securities or types of securities.

Agreements may not be assigned without client consent.

Types of Agreements

The following agreements define the typical client relationships.

Financial Planning Agreement

A financial plan is designed to help the client with all aspects of financial planning without ongoing investment management after the financial plan is completed.

The financial plan may include, but is not limited to: a net worth statement; a cash flow statement; a review of investment accounts, including reviewing asset allocation and providing repositioning recommendations; strategic tax planning; a review of retirement accounts and plans including recommendations; a review of insurance policies and recommendations for changes, if necessary; one or more retirement scenarios; estate planning review and recommendations; and education planning with funding recommendations.

Detailed investment advice and specific recommendations are provided as part of a financial plan. Implementation of the recommendations is at the discretion of the client.

The fee for a financial plan is predicated upon the facts known at the start of the engagement. The minimum fee is the greater of $500 or 1% of gross annual income and is negotiable based on individual financial circumstances. Since financial planning is a discovery process, situations occur wherein the client is unaware of certain financial exposures or predicaments.

In the event that the client's situation is substantially different than disclosed at the initial meeting, a revised fee will be provided for mutual agreement. The client must approve the change of scope in advance of the additional work being performed when a fee increase is necessary.

After delivery of a financial plan, future face-to-face meetings may be scheduled as necessary for up to one month. Follow-on implementation work is billed separately and is negotiated based on client circumstances.

In cases where an individual may need financial advice, but does not require an entire financial analysis work is done at the rate of $200/hr.

Advisory Service Agreement

Clients may choose to have 401 Advisor, LLC manage their assets in order to obtain ongoing in-depth investment management. Realistic and measurable goals are set and objectives to reach those goals are defined. As goals and objectives change over time, suggestions are made and implemented on an ongoing basis. In such instances a fee may be incurred separately for the financial planning services.

The scope of work and fee for an Investment Management Services Agreement is provided to the client in writing prior to the start of the relationship. An investment management Service Agreement includes investment management for the client in one or more of the advisor's investment management strategies.

The annual Investment Management Service Agreement fee is based on a percentage of the investable assets based on the strategy used according to the following schedule:

_1.25% Utility Income Strategies

_1.50% Dividend income Plus Strategy, ETF Seasonal Opportunity Strategy.

_1.75% Sector Rotation Strategy

--***The lesser of*** 1% or $795/yr for individual 401(k) accounts, variable annuity and variable life accounts where an employee or investment advisor representative of the firm is not the selling rep of record for the plan or annuity product.

There is not a minimum annual fee, other than as stated above, although some strategies may not be appropriate accounts due to the negative impact of trading costs in strategies with a higher turnover rate. Fees are negotiable. Current client relationships may exist where the fees are higher or lower than the fee schedule above.

Although the Advisory Service Agreement is an ongoing agreement and constant adjustments are required, the length of service to the client is at the client's discretion. The client or the investment manager may terminate an Agreement by written notice to the other party. At termination, fees will be billed on a pro rata basis for the portion of the quarter completed. The portfolio value at the completion of the prior full billing quarter is used as the basis for the fee computation, adjusted for the number of days during the billing quarter prior to termination.

Tax preparation work is not performed by the Advisor. However, tax services can be arranged through an on-site, but not affiliated, CPA. There are no referral fees paid to the advisor for tax services.

Retainer Agreement

In some circumstances, a *Retainer Agreement* is executed in lieu of an *Advisory Service Agreement* when it is more appropriate to work on a fixed-fee basis. The annual fee for a *Retainer Agreement* is negotiable.

Hourly Planning Engagements

401 Advisor, LLC provides hourly planning services for clients who need advice on a limited scope of work. The hourly rate for limited scope engagements is $200/hr.

Asset Management

401 Advisor, LLC uses Ceros Financial Services, Inc.(CFS) as our broker/dealer and assets are held at National Financial Services, a division of Fidelity Investments. Ceros Financial Services, Inc. charges a transaction fee

for the purchase of stocks, bonds, ETFs and some mutual funds. A description of all fees and expenses charged by CFS is attached.

401 Advisor, LLC uses Ceros Financial Services to transact security trades because of their ability to place trades at the lowest cost to the client through multiple clearing arrangements. They also provide 401 Advisor, LLC with block trading technology. Through block trading all clients that hold a sold or newly purchased security receive the same average price, even if the trade was actually done over time at multiple prices.

401 Advisor, LLC can use other broker/dealers or custodians of our choosing. The advisor reviews other clearing arrangements on a regular basis for cost, efficiency and overall benefit to our clients.

Clients may request our trading services for accounts held at other custodians. While we may accept these arrangements, it may incur an additional cost, as we lose efficiencies that we gain through the use of Ceros financial services, Inc.

Assets are invested primarily in stocks, bonds and exchange-traded funds (ETFs), Mutual Fund and ETF companies charge each fund shareholder an investment management fee that is disclosed in the fund prospectus. Ceros Financial Services, Inc. charges a transaction fee for the purchase of stocks, bonds, ETFs and some mutual funds. A description of all fees and expenses charged by CFS is attached.

The brokerage firm charges a fee for stock and bond trades. 401 Advisor, LLC does not receive any compensation, in any form, from fund or brokerage companies.

Investments may include: equities (stocks), warrants, corporate debt securities, certificates of deposit, municipal securities, investment company securities (variable life insurance, variable annuities, and mutual funds shares), U. S. government securities, options contracts, futures contracts, and interests in partnerships. We may also purchase “short” ETFs, that is ETFs whose investment strategy is to profit from a downward movement in a specific index or sector that they track. Such “short” exposure is used as a hedging tool, to offset losses in a portion of a portfolio if the market does in fact go down. We do not use short or inverse ETFs to “naked short” an index. That is we will not only hold a short ETF, or combination of short ETFs as the only position(s) in a portfolio.

Initial public offerings (IPOs) are not available through 401 Advisor, LLC.

Termination of Agreement

A Client may terminate any of the aforementioned agreements at any time by notifying 401 Advisor, LLC in writing and paying the rate for the time spent on the investment advisory engagement prior to notification of termination. If the client made an advance payment, 401 Advisor, LLC will refund any unearned portion of the advance payment.

401 Advisor, LLC may terminate any of the aforementioned agreements at any time by notifying the client in writing. If the client made an advance payment, 401 Advisor, LLC will refund any unearned portion of the advance payment.

Fees and Compensation

Description

401 Advisor, LLC bases its fees on a percentage of assets under management, hourly charges, and fixed fees. We also consider any commissions earned through our services as a registered representative of WRP Investments Inc., or commissions earned for life and annuity sales as individual insurance agents.

Some *Retainer Agreements* may be priced based on the complexity of work, especially when asset management is not the most significant part of the relationship.

Financial plans are priced according to the degree of complexity associated with the client's situation.

Fees are *negotiable*.

Fee Billing

Investment management fees are billed quarterly, in advance, meaning that we invoice you before the three-month billing period has begun. Fees are deducted from a designated client account to facilitate billing. The client may choose to pay the advisory fee directly. In such instances, the client's designated investment account will be credited upon receipt of payment. The client must consent in advance to direct debiting of their investment account.

Fees for financial plans are billed 50% in advance, with the balance due upon delivery of the financial plan.

Other Fees

Custodians may charge transaction fees on purchases or sales of certain stocks, bonds, mutual funds and exchange-traded funds. These transaction charges are usually small and incidental to the purchase or sale of a security. The selection of the security is more important than the nominal fee that the custodian charges to buy or sell the security.

401 Advisor, LLC, in its sole discretion, may waive its minimum fee and/or charge a lesser investment advisory fee based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with clients, etc.).

New Advisory Service Agreement fees are calculated on a formula basis and adjusted for complexity of individual situations. *The formula is based on gross income, gross assets and other financial considerations.*

Expense Ratios

Mutual funds and Exchange Traded Funds generally charge a management fee for their services as investment managers. The management fee is called an expense ratio. For example, an expense ratio of 0.50 means that the mutual fund company charges 0.5% for their services. These fees are in addition to the fees paid by you to 401 Advisor, LLC.

Performance figures quoted by mutual fund companies in various publications are after their fees have been deducted.

Past Due Accounts and Termination of Agreement

401 Advisor, LLC reserves the right to stop work on any account that is more than 30 days overdue. In addition, 401 Advisor, LLC reserves the right to terminate any financial planning engagement where a client has willfully concealed or has refused to provide pertinent information about financial situations when necessary and appropriate, in 401 Advisor, LLC judgment, to providing proper financial advice. Any unused portion of fees collected in advance will be refunded within 10 days.

Performance-Based Fees

Sharing of Capital Gains

Fees are not based on a share of the capital gains or capital appreciation of managed securities.

401 Advisor, LLC does not use a performance-based fee structure because of the potential conflict of interest. Performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client.

Performance based fees are only allowed per SEC regulations for individual investors with a net worth in excess of $1,000,000 and/or an individual income in excess of $200,000 per year, or joint income in excess of $300,000 per year in each of the two most recent years.

Types of Clients

Description

401 Advisor, LLC can provide investment advice to individuals, banks or thrift institutions, investment companies, pension and profit sharing plans, trusts, estates, charitable organizations, corporations or business entities.

Client relationships vary in scope and length of service.

Account Minimums

There is no stated account minimum size. Technology in the investment management field allows us to make identical trades in all accounts with the same strategy at the same time. 401 Advisor, LLC has created specific investment strategies that are designed for smaller accounts. While no strategy has a stated minimum, some strategies may be inappropriate for certain accounts as trading costs, such as transaction fees, have a larger proportionate affect on smaller accounts. Since 401 Advisor, LLC is compensated based on assets under management for investment management services, it is in our best interest to match clients appropriately with our investment strategies.

Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis

Security analysis methods may include charting, fundamental analysis, technical analysis, and cyclical analysis. We also use a proprietary investment strategy based on our own research. The research has been published at the Market Technician's Association website at MTA.org, **Using Style Index Momentum to Generate Alpha**. Our paper received the prestigious Charles H. Dow Award in 2009. The paper was co-authored by Samuel Tibbs PhD and Stanley Eakins PhD.

The main sources of information include financial websites, newsletters, and subscription services. Other information may be found in newspapers and magazines, inspections of corporate activities, research materials prepared by others, corporate rating services, timing services, annual reports, prospectuses, filings with the Securities and Exchange Commission, and company press releases.

Mutual fund and exchange traded fund data used for our 401(k) advisory service is from Steele Mutual Fund Expert, data provided by Morningstar, Inc.

Investment Strategies

401 Advisor, LLC manages several investment "portfolios" using specific investment strategies unique to each portfolio. Clients' accounts are grouped with other client accounts utilizing the same strategies. Although each client maintains a separate account with our custodian, the investments within the account are "block" traded simultaneously with other clients that hold the same security. If partial blocks are executed at different prices, all clients will receive the same average cost per share. Client accounts within the same strategy may, or may not all hold identical securities in the same proportion. But all securities will be consistent with that strategies overall investment objective. The investment strategy for a specific client is based upon the stated financial objectives stated by the client during consultations. A client is invested in the same or similar portfolios as other clients. The client may change these objectives at any time. Each client executes an Investment

Policy Statement that documents their objectives and their desired investment strategy.

The attached Investment policy statement describes the investment strategy for each investment objective.

Risk of Loss

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks:

- Interest-rate Risk: Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- Market Risk: The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security’s particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- Inflation Risk: When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- Currency Risk: Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment’s originating country. This is also referred to as exchange rate risk.
- Reinvestment Risk: This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- Business Risk: These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- Liquidity Risk: Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.

- Financial Risk: Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

Disciplinary Information

Legal and Disciplinary

The firm and its employees have not been involved in legal or disciplinary events related to past or present investment clients.

Other Financial Industry Activities and Affiliations

Financial Industry Activities

401 Advisor, LLC has no other financial industry affiliations.

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

Code of Ethics

The employees of 401 Advisor, LLC have committed to a Code of Ethics that is available for review by clients and prospective clients upon request. The firm will provide a copy of the Code of Ethics to any client or prospective client upon request.

Participation or Interest in Client Transactions

401 Advisor, LLC and its employees may buy or sell securities that are also held by clients. Employees may not trade their own securities ahead of client trades. Employees comply with the provisions of the 401 Advisor, LLC *Compliance Manual*.

Personal Trading

The Chief Compliance Officer of 401 Advisor, LLC is William DeShurko. He reviews all employee trades each quarter. His trades are reviewed by WRP Investments, Inc. The personal trading reviews ensure that the personal trading of employees does not affect the markets, and that clients of the firm receive preferential treatment. Since most employee trades are small mutual fund trades or exchange-traded fund trades, the trades do not affect the securities markets.

Brokerage Practices

Selecting Brokerage Firms

401 Advisor, LLC does not have any affiliation with product sales firms. Specific custodian recommendations are made to Clients based on their need for such services. 401 Advisor, LLC recommends custodians based on the proven integrity and financial responsibility of the firm and the best execution of orders at reasonable commission rates.

401 Advisor, LLC recommends Ceros Financial Services, Inc. as our brokerage firm and National Financial Services, a division of Fidelity Investments, as the custodian firm. Use of these firms allows 401 Advisor, LLC to affect block trades for all client accounts managed with the same investment strategy. If a client chooses to use a different broker and/or custodian firm, then 401 Advisor, LLC may choose to either decline to manage the client assets or charge a higher fee to compensate for the additional time and effort required to administer the account.

401 Advisor, LLC does not receive fees or commissions from any of these arrangements.

Best Execution

401 Advisor, LLC reviews the execution of trades at Ceros Financial Services, Inc. when block trades are executed. The review is documented in the 401 Advisor, LLC *Compliance Manual*. Trading fees charged by the custodians are also reviewed on a quarterly basis. 401 Advisor, LLC does not receive any portion of the trading fees.

Soft Dollars

401 Advisor, LLC DOES NOT receive any soft dollar compensation from any firm that could affect the firm's objectivity in providing our services.

Order Aggregation

Most trades are individual stocks and exchange-traded funds where trade aggregation does garner a client benefit by keeping trading fees low. The efficiency of order aggregation also allows the advisor to not impose investment minimums and allows for better ongoing review of client holdings by limiting the number of securities held by the advisors clients.

Review of Accounts

Periodic Reviews

Account reviews are performed as requested by the client.

Since the advisor manages specific portfolio strategies, each strategy is reviewed on a near daily basis. Individual holding review is an ongoing, daily process unless dictated otherwise by the specific trading system in place.

Some strategies require that holdings be reviewed on a time basis, such as every 30 days, 60 days or 90 days. Other strategies require regular review to monitor security prices relative to historic prices (moving averages), or based on the release of company financial statements, or published broker recommendations.

Review Triggers

Market conditions may trigger an immediate review of specific holdings. The advisor also monitors changes in the tax laws, new investment information, and changes in a client's own situation.

Financial Planning and retainer arrangements will have set review periods as defined in the individual agreement.

Regular Reports

Clients receive periodic communications. Investment clients receive monthly statements from the custodian, National Financial Services, quarterly statements from 401 Advisor, LLC and online account access 24/7. Financial Planning clients, and retainer agreement clients receive written quarterly updates, or as indicated in their individual fee agreement. The written updates may include a net worth statement, portfolio statement, and a summary of objectives and progress towards meeting those objectives.

Client Referrals and Other Compensation

Incoming Referrals

401 Advisor, LLC has been fortunate to receive many client referrals over the years. The referrals came from current clients, estate planning attorneys, accountants, employees, personal friends of employees and other similar sources. The firm does not compensate referring parties for these referrals.

Referrals Out

401 Advisor, LLC does not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

Other Compensation

Investment Advisor Representatives or other employees of 401 Advisor, LLC may also be registered representatives of WRP Investments, Inc., a FINRA registered Broker/Dealer, independent insurance agents, or engaged in other related businesses. Any compensation from other activities may be used to offset partially or in whole, the fees charged by 401 Advisor, LLC.

Custody

Custody

401 Advisor LLC has custody of client funds, only to the extent that we can withdraw fees directly from client accounts. This is provided as a service to clients and requires client authorization by signing our Client Agreement form. Clients should check their statements from their custodian to ensure withdraws are accurate when compared to their quarterly fee billing notice provided by 401 Advisor, LLC.

Account Statements

All assets are held at qualified custodians, which means the custodians provide account statements directly to clients at their address of record at least quarterly.

Performance Reports

Clients are urged to compare the account statements received directly from their custodians to the performance report statements provided by 401 Advisor, LLC. Performance reports are generated by Albridge Solutions, Inc. a third party provider contracted through WRP Investments, Inc.

Net Worth Statements

Clients are not provided net worth statements unless they have entered into a financial planning agreement and have fully disclosed all outside assets.

Investment Discretion

Discretionary Authority for Trading

401 Advisor, LLC accepts discretionary authority to manage securities accounts on behalf of clients. 401 Advisor, LLC has the authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold.

The client approves the custodian to be used and the transaction fee rates paid to the custodian. 401 Advisor, LLC does not receive any portion of the transaction fees paid by the client to the custodian on certain trades.

Discretionary trading authority facilitates placing trades in your accounts on your behalf so that we may promptly implement the investment policy that you have approved in writing.

Limited Power of Attorney

A limited power of attorney is a trading authorization for this purpose. You sign a limited power of attorney so that we may execute the trades that you have approved.

Voting Client Securities

Proxy Votes

401 Advisor, LLC does not vote proxies on securities. Clients are expected to vote their own proxies. Timely voting of proxies lowers the expense to the company soliciting the proxy. Lower costs are in the best interest of the investor.

When assistance on voting proxies is requested, 401 Advisor, LLC will provide recommendations to the Client. If a conflict of interest exists, it will be disclosed to the Client.

Financial Information

Financial Condition

401 Advisor, LLC does not have any financial impairment that will preclude the firm from meeting contractual commitments to clients.

A balance sheet is not required to be provided because 401 Advisor, LLC does not serve as a custodian for client funds or securities, and does not require prepayment of fees of more than $600 per client and six months or more in advance.

Business Continuity Plan

General

401 Advisor, LLC has a Business Continuity Plan in place that provides detailed steps to mitigate and recover from the loss of office space, communications, services or key people.

Disasters

The Business Continuity Plan covers natural disasters such as snow storms, hurricanes, tornados, and flooding. The Plan covers man-made disasters such as loss of electrical power, loss of water pressure, fire, bomb threat, nuclear emergency, chemical event, biological event, Internet outage, railway accident and aircraft accident. Electronic files are backed up monthly and archived offsite. All client account data is available at the custodian’s website.

Alternate Offices

Alternate offices are identified to support ongoing operations in the event the main office is unavailable. It is our intention to contact all clients within five days of a disaster that dictates moving our office to an alternate location.

401 Advisor, LLC can perform all services and functions from virtually any location with internet access, a laptop computer, and a printer. Software

programs used to facilitate investment management decisions is loaded on an off sight computer. We will have calls forwarded to a cell phone for client communications as soon as is reasonably possible.

Loss of Key Personnel

401 Advisor, LLC has signed a Business Continuation Agreement with another financial advisory firm to support 401 Advisor, LLC in the event of William DeShurko's serious disability or death.

Information Security Program

Information Security

401 Advisor, LLC maintains an information security program to reduce the risk that your personal and confidential information may be breached.

Privacy Notice

401 Advisor, LLC is committed to maintaining the confidentiality, integrity and security of the personal information that is entrusted to us.

The categories of nonpublic information that we collect from you may include information about your personal finances, information about your health to the extent that it is needed for the financial planning process, information about transactions between you and third parties, and information from consumer reporting agencies, e.g., credit reports. We use this information to help you meet your personal financial goals.

With your permission, we disclose limited information to attorneys, accountants, and mortgage lenders with whom you have established a relationship. You may opt out from our sharing information with these nonaffiliated third parties by notifying us at any time by telephone, mail, fax, email, or in person. With your permission, we share a limited amount of information about you with your brokerage firm in order to execute securities transactions on your behalf.

We maintain a secure office to ensure that your information is not placed at unreasonable risk. We employ a firewall barrier, secure data encryption techniques and authentication procedures in our computer environment.

We do not provide your personal information to mailing list vendors or solicitors. We require strict confidentiality in our agreements with unaffiliated third parties that require access to your personal information, including financial service companies, consultants, and auditors. Federal and state securities regulators may review our Company records and your personal records as permitted by law.

Personally identifiable information about you will be maintained while you are a client, and for the required period thereafter that records are required to be maintained by federal and state securities laws. After that time, information may be destroyed.

We will notify you in advance if our privacy policy is expected to change. We are required by law to deliver this *Privacy Notice* to you annually, in writing.

Brochure Supplement
Part 2B of Form ADV
12/28/2011

Brochure Supplement (Part 2B of Form ADV)

Education and Business Standards

401 Advisor, LLC requires that Investment Advisor Representatives in its employ have a bachelor's degree and/or coursework or practical experience demonstrating knowledge of financial planning or investment management.

William DeShurko

Educational Background: BA in Economics University of Rochester, Rochester NY - 1981

- Date of birth: 12/06/1957

Business Experience:

- 1987 – 1988 Westminster Financial Services. Registered Representative
- 1987 – Obtained Series 7 general securities license
- 1988 – 1993 Plan America. Registered Representative.
- 1993 – Present DeShurko Investment Services, Inc. Independent registered representative, Investment Advisor Representative, and independent insurance representative for life insurance and annuities
- 1993 – Obtained the Series 24 Branch Managers securities License
- 1993-2004 Branch Manager LPL Financial Services
- 1998 – 2004 Partner DeShurko and Harrison Financial Services
- 1998 – 2004 Partner D&H Mortgage Company. Owner and licensed mortgage broker
- 1998 – 2004 Partner DeShurko and Harrison Properties
- 2004 – 2006 Branch Manager Primary Residential Mortgage, Inc.
- 2004 – Present. Managing Member/President 401 Advisor, LLC
- 2004 – Present. Owner DeShurko Properties, Inc.
- 2004 - Present. Registered Representative for WRP Investments, Inc. and Investment Advisor Representative of WRP Advisory Services, Inc. DBA DeShurko Investment Services, Inc.
- 2007 Penguin Publishing Group. Authored The Naked Truth About Your Money
- 2007 – Present. Independent contractor, contributor to www.HorsesMouth.com an educational web site for financial services professionals

Disciplinary Information: None

Other Business Activities: Real Estate rental through DeShurko Properties, LLC. Writer for HorsesMouth.com. Write an investment blog for www.citizen-USA.com.

Additional Compensation: Rental Income from DeShurko Properties, LLC, writing fees for submissions to www.HorsesMouth.com, and residual income from Penguin Publishing Group.

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None

Michelle L. Bolanger

Cumberland College, 1988-89

- Date of birth: 7/4/1970

Business Experience:

- 1989-1991 – CSR, First National Bank Of Southwest Ohio, CSR
- 1992-1998 – Branch Manager, Loan Officer – Lebanon Citizens National Bank
- 1999 – 2000 – CSM – Medical Equipment Services
- 2001-2003 – Registered Sales Assistant – Provident Securities and Investments, Inc
- 2003 – 2005 – Lead CSR - National City Bank
- 2006 – 2011 – Administrative Assistant – 401 Advisor, LLC

Disciplinary Information: None

Other Business Activities:

Michelle serves as the secretary for Living Water Worship Center in Spring Valley, Ohio. She is also an amateur photographer who has done shows in the greater Cincinnati area.

Michelle holds a Series 7 General Securities License

Additional Compensation: None

Supervision:

Michelle Bolanger is supervised by William E DeShurko, President, who reviews Michelle's work through frequent office interactions.

William DeShurko's contact information:

(937) 434-1790
bill@401advisor.com

Thomas W Wild

B.S. Ohio State University 1985

- 6/01/1962

Business Experience:

- 1986 – 1989 - Registered Representative, Equitable life
- 1990 – 1999 - Registered Representative, Phoenix Home Life
- 2000 – 2002 - District Manager, Mass Mutual Financial Companies
- 2000 – Present - President, Cogent Financial Group, LTD
- 2006 – Present - Director of Client Relations, 401 Advisor, LLC

Disciplinary Information: None

Other Business Activities:

Secretary/Treasurer of Replace This Face, LLC. Part time High School sports official.

Additional Compensation: Commissions and renewal commissions from insurance products

Supervision:

Thomas W Wild is supervised by William E DeShurko. He reviews Thomas' work through frequent office interactions.

SUPERVISOR'S contact information:

William E DeShurko
937-434-1790
bill@401advisor.com

Stefan F. Geyer

Chartered Life Underwriter® (CLU®) – October 11, 1986

The Chartered Life Underwriter® has earned the premier credential in the insurance profession, representing eight or more comprehensive college-level courses covering all aspects of insurance planning, estate and retirement issues, taxation, business insurance and risk management. For more than 80 years consumers have trusted this mark, which is conferred by The American College, a non-profit educator with the level of accreditation.

The average study time for the program is over 400 hours and can take years to earn. Each CLU® must also complete a minimum of 30 hours of continuing education every two years and meet extensive experience requirements, ensuring the knowledge is both comprehensive and current.

Chartered Financial Consultant® (ChFC®) – October 7, 1987

The Chartered Financial Consultant® has completed the most extensive educational program required for any financial services credential. Each ChFC® has taken eight or more college-level courses on all aspects of financial planning from The American College, a non-profit educator with the highest level of academic accreditation.

The average study time for the program is over 400 hours, and advisors frequently spend years earning this coveted distinction. Each ChFC® must also complete a minimum of 30 hours of continuing education every two years and must meet extensive experience requirements to ensure that you get the professional financial advice you need.

Advisors with the CLU® and / or the ChFC® designation(s) are required to serve with the highest level of professionalism. The authority to use the CLU® and / or the ChFC® mark(s) is granted by the Certification Committee of the Board of Trustees of the American College, and the privilege is contingent on adherence to strict ethical guidelines. All CLU® and ChFC® advisors are required to do the same for clients that they would do for the themselves in similar circumstances, the standard of ethical behavior most beneficial for their clients.

May 2, 1957

University of Toledo – 1975

Miami University (Middletown, OH) – 1975 / 1976

Miami University (Oxford, OH) – 1976 / 1980

The American College – 1982 / 1987

Employee and Registered Representative

The Equitable Life Assurance Society of the United States – 1980 / 1988

Equico Securities, Inc. – 1981 / 1988

Harlan Miller and Associates – 1988 / 1989

The Equitable Life Assurance Society of the United States – 1989 / 1992

Equico Securities, Inc. – 1989 / 1992

PNC Bank – 1992

Star Bank – 1992

Phoenix Life Insurance Company – 1992 / 2003

W.S. Griffith Securities, Inc. – 1992 / 2004

WRP Securities, Inc. – 2004 / 2010

Employee

401 Advisor, LLC – 2011 / Present

Self-Employed

Pinnacle Advisory Group – 1992 / 2010

Stefan F. Geyer, CLU, ChFC / Sole Proprietor / Independent Insurance Agent – licensed for life, accident and health insurance.

Kim Smith-Fuller

College Experience

- Miami University, Oxford Ohio Computer Information Technology

Business Experience:

- 1995-1997 Northwestern Mutual Life Insurance – Administrative Assistant
- 1997-2004 McGohan Brabender – Account Manager
- 2004-2006 Brower Insurance Agency, LLC – Account Manager
- 2006 – 2007 Self-employed Ohio licensed Health and Life Agent
- 2007-2009 Amerigroup Community Care – Senior Marketing Rep
- 2009 – Present Self employed Ohio Licensed Health and Life Insurance Agent
- 2011 – Present 401 Advisor, LLC - Customer Relationship Representative

Disciplinary Information: None

Other Business Activities:

Additional Compensation: Commissions and renewal commissions from insurance products

Supervision:

Kim is supervised by William E DeShurko. He reviews Kim's work through frequent office interactions.

SUPERVISOR'S contact information:

William E DeShurko
937-434-1790
bill@401advisor.com