



FORM ADV PART 2A - MARCH 27TH, 2023

This brochure (also known as Part 2 of Form ADV) is filed with the Securities and Exchange Commission and provides standard information about the qualifications and business practices of MAXadvisor, LLC. If you have any questions about the contents of this brochure, please contact us at 888-871-7307. 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.

MAXadvisor, LLC is a registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an adviser provide you with information about which you determine to hire or retain an adviser.

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





ITEM 2 - MATERIAL CHANGES

On July 28, 2010, the Securities and Exchange Commission published “Amendments to Form ADV” which amends the disclosure document that we provide to clients as required by SEC Rules. This brochure, dated 3/27/2023, is a document prepared according to the SEC’s new requirements and rules. As such, this document is materially different in structure and requires certain new information that our previous brochure did not require.

There have been no material changes to this brochure since our last annual updating amendment, dated 3/27/2022.

In the past we have offered or delivered information about our qualifications and business practices to clients on at least an annual basis. Pursuant to new SEC Rules, we will ensure that you receive a summary of any materials changes to this and subsequent Brochures within 120 days of the close of our business’ fiscal year. We may further provide other ongoing disclosure information about material changes as necessary.

We will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

Currently, our Brochure may be requested by contacting Jim Skahan at 888-871-7307 or jskahan@maxadvisor.com. Our Brochure is also available on our website www.maxadvisor.com.

Additional information about MAXadvisor is also available via the SEC’s web site www.adviserinfo.sec.gov. The SEC’s web site also provides information about any persons affiliated with MAXadvisor who are registered, or are required to be registered, as investment adviser representatives of MAXadvisor.





TABLE OF CONTENTS

ITEM 02 - Material Changes	2
ITEM 04 - Advisory Business	4
ITEM 05 - Fees & Compensation	8
ITEM 06 - Performance Bases Fees & Side-By-Side Management	12
ITEM 07 - Types of Clients	13
ITEM 08 - Methods of Analysis, Investment Strategies & Risk of Loss	14
ITEM 09 - Disciplinary Information	18
ITEM 10 - Other Financial Industry Activities & Affiliations	19
ITEM 11 - Code of Ethics	20
ITEM 12 - Brokerage Practices	22
ITEM 13 - Review of Accounts	24
ITEM 14 - Client Referrals & Other Compensation	25
ITEM 15 - Custody	26
ITEM 16 - Investment Discretion	27
ITEM 17 - Voting Client Securities	28
ITEM 18 - Financial Information	29
ITEM 19 - Requirements for State-Registered Advisors	30





ITEM 4 - ADVISORY BUSINESS

MAXadvisor, LLC, established on October 17th 2002, offers fee-only investment advisory services, including ongoing portfolio management with a range of objectives from conservative income-oriented to aggressive growth-oriented strategies. Principal owners are Jonas Ferris and James Skahan. MAXadvisor, LLC is an Oregon based limited liability company.

MAXadvisor receives compensation solely from fees paid directly by clients. The firm does not accept commissions in any form and does not accept (or pay) referral fees. MAXadvisor receives no benefits from custodians/broker-dealers based on client securities transactions ("soft dollar benefits").

ONGOING PORTFOLIO MANAGEMENT SERVICES

MAXadvisor builds customized portfolios comprised primarily of investment companies including mutual funds, ETFs, ETNs, and closed-end funds using the strategies described in Item 8 - Methods of Analysis. After gauging the appropriate risk profile of the client, our goal is to achieve risk-adjusted returns that compare favorably to broad market indexes by building a diversified portfolio primarily of stock and bond mutual funds, including money market funds and cash accounts.

The initial consultation is free of charge and is considered an exploratory interview to determine the extent to which investment management may be beneficial to the client.

We develop investment policy guidelines documented in an Investment Policy Statement (IPS) and then design an investment portfolio that we manage on a discretionary basis. MAXadvisor accepts limited power of attorney to execute transactions on behalf of clients without obtaining specific consent before every transaction. This authority is limited to securities contained in the client's managed accounts, and is typically granted by the investment advisory agreement you sign with the our firm, a power of attorney, or trading authorization forms.



MAXADVISOR PRIVATE MANAGEMENT

4949 NE 16th AVE UNIT D PORTLAND, OR 97211-5000 PHONE/FAX: 888-871-7307

A Registered Investment Adviser



ITEM 4 - ADVISORY BUSINESS (CONTINUED)

We monitor your portfolio's performance on an ongoing basis, and rebalance the portfolio when we deem appropriate, considering trading costs, taxes, other market opportunities, and client risk level. Clients are responsible for notifying us of any changes in their circumstances that would necessitate a review or revision of the client's portfolio.

Clients may impose restrictions on investing in certain securities or types of securities. This must be done in writing and be signed by the client. Agreements may not be assigned without client consent.

A client may make additions to and withdrawals from the client's portfolio account at any time, subject to the Firm's right to terminate an account we feel has become unmanageable because of asset size or by incoming or outgoing cash flow. Clients may withdraw account assets with notice to the Firm, subject to the usual and customary securities settlement procedures. However, we design client portfolios as long-term investments and caution our clients that asset withdrawals may impair the achievement of the client's investment objectives.

Additions to an account may be in cash or securities, provided that we may decline to accept particular securities into a client's account or may recommend that the security be liquidated if it is inconsistent with the Firm's investment strategy or the client's investment objectives. Clients are advised that when transferred securities are liquidated, they may be subject to transaction fees, fees assessed at the mutual fund level (i.e. contingent deferred sales charge) and/or tax ramifications.

Client investment assets managed by MAXadvisor Private Management are held by independent qualified custodians, including TD Ameritrade and Scottrade, in the client's name. MAXadvisor does not act as the physical custodian of any client assets.





ITEM 4 - ADVISORY BUSINESS (CONTINUED)

INVESTING PROCESS

Factors used in choosing funds for clients include, among other things, our own proprietary fund rating system, fund expense ratios, management tenure, risk-adjusted performance, fund size relative to category, fund holdings, transaction and redemption fees, ease and cost in purchasing and redeeming, availability to client, interviews with fund company personnel, SEC filings and reports by fund companies, and third party reports and analysis.

Most portfolios are low turnover with expected portfolio turnover rates lower than 50%, meaning we hold most funds for more than one year. The funds themselves can have turnover ratios in excess of 100%, though most have below average turnover ratios. Factors employed in deciding when to switch funds can include tax implications, costs, fund performance, manager changes, category fundamentals and valuations, relative performance, and how in or out of favor fund categories are with investors.

We do not employ fund timing or market timing strategies that use charts, momentum, and other technical indicators, and are, in general, invested in stock and bond funds at all times. We will shift allocations to areas of the market or broad categories of securities based on valuations, and our forecasts for future returns which tend to go up as the market declines – not momentum or chart based timing systems.

We tend to increase exposure to areas that are generally out-of-favor with investors (particularly other fund investors) and monitor fund cash flows and recent category performance to make these decisions. Client portfolios will usually see increasing stock fund allocations during periods of market weakness and/or when fund investors in general are not favoring stock funds. This means client portfolio risk levels can rise and fall as the market moves. As such, client accounts can have more downside risk than they had during an earlier stage of a market decline due to increasing allocations to stocks.





ITEM 4 - ADVISORY BUSINESS (CONTINUED)

TERMINATION

A client may terminate the Investment Advisory Agreement at any time upon written notification and is not liable for any fees from that point onward. We do not assess any fees related to termination. The last bill will be calculated on a prorated basis to the date of termination. If client terminates at or within five days of any quarterly billing, that amount will be refunded in full. Otherwise, final management fees will be calculated on a prorated basis to the date of termination. Fees will be charged directly to the account or invoiced to the client, depending on the specific terms arranged between the client and MAXadvisor. MAXadvisor may terminate any of the aforementioned agreements at any time by notifying the client in writing.

ASSETS UNDER MANAGEMENT

As of December 31st, 2022, MAXadvisor, LLC manages \$25,293,650 on a discretionary basis. We do not manage any client assets on a non-discretionary basis.





ITEM 5 - FEES & COMPENSATION

FEE SCHEDULE*

The fee for private management through MAXadvisor Private Management is based on a percentage of client assets we manage as set forth in the following fee schedule:

ASSETS UNDER MANAGEMENT	ANNUAL FEE %
FIRST \$3 MILLION	0.50%
BALANCE OVER \$3 MILLION	0.30%

We don't have an account minimum for investment advisory services but charge a minimum quarterly fee of \$750 per client. MAXadvisor, in its sole discretion, may negotiate to charge a different investment management fee or minimum fee based upon, among other criteria, anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, pre-existing client relationship, account retention and/or pro bono activities.

This graduated fee schedule results in a blended fee for assets over \$3,000,000. For example, the blended annual fee for \$5,000,000 under management is 0.42% - the first \$3,000,000 is billed at 0.50% and the next \$2,000,000 at 0.30%:

ASSETS UNDER MANAGEMENT	ANNUAL FEE \$
FIRST \$3 MILLION	\$15,000.00
NEXT \$2 MILLION	\$6,000.00

Portfolios under \$600,000 effectively have an annual fee over 0.50% because of the overriding minimum fee: a portfolio of \$400,000 results in a 0.75% annual fee as it is subject to a minimum fee of \$750 per quarter. Accounts belonging to spouses and immediate household members may be combined in applying the fee schedule above at our discretion.

*FEE STRUCTURE MIGHT DIFFER FOR EXISTING CLIENTS





ITEM 5 - FEES & COMPENSATION (CONTINUED)

BILLING PROCESS

There are no development, transfer, or setup fees. Management fees will be billed and paid quarterly based upon the market value of the client's total managed portfolio valued at the end of the quarter. All billing takes place in the first month of the quarter and covers the previous quarter, not in advance of future management services. Clients elect to pay fees directly - via check or credit card - or to authorize MAXAdvisor to directly debit fees from accounts.

MAXAdvisor's fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the client.

MAXAdvisor bills for full calendar quarters (three month time periods), in arrears, meaning that we invoice clients after the three-month billing period has ended. MAXAdvisor uses the quarter end balance to determine the client's fee. Payment in full is expected upon invoice presentation.

The first partial quarter, if any, will be at no cost to the client (i.e., for an account set up for management with MAXAdvisor on February 20th there will be no billing until July when the first quarterly charge will be billed for the previous three months of April – June; the 2nd quarter of the year).

Clients will receive an invoice from MAXAdvisor at the end of each billing quarter showing the amount of the fee, the value of assets on which the fee is based, and the annual fee percentage on which the fee is based. The qualified custodian (i.e. TD Ameritrade, Scottrade, etc.) will also deliver an account statement to you at least quarterly. These account statements will show all disbursements from your account. You should review all statements for accuracy. Fees are usually deducted from a designated client account and paid to us by the client's custodian to facilitate billing. The client must consent in advance to directed debiting of their investment account. In certain instances we will accept payment via check or credit card.



MAXADVISOR PRIVATE MANAGEMENT

4949 NE 16th AVE UNIT D PORTLAND, OR 97211-5000 PHONE/FAX: 888-871-7307

A Registered Investment Adviser



ITEM 5 - FEES & COMPENSATION (CONTINUED)

MAXadvisor is a fee-only financial advisor. We don't sell investment products, insurance or annuities and don't receive commissions from any types of client securities transactions. MAXadvisor does not receive sales commissions from load funds and chooses only no-load (or load waived) funds for client accounts. All fees to MAXadvisor for portfolio management is paid by the client and invoiced in each quarterly statement – there are no other income producing relationships between MAXadvisor and any broker or fund company. MAXadvisor receives some income from Google "Adsense" ads that are displayed on maxfunds.com.

Item "Brokerage Practices" further describes the factors that MAXadvisor considers in selecting or recommending broker-dealers for client transactions and determining the reasonableness of their compensation (e.g., commissions).

Clients may incur certain charges imposed by custodians, brokers, third party investment and other third parties such as fees charged by managers, custodial fees, deferred sales charges, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. We don't receive any portion of these fees.

Mutual funds and exchange traded funds also charge management and other fees, which are disclosed in a fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to MAXadvisor's fee, and MAXadvisor shall not receive any portion of fees charged by mutual funds.

Mutual fund fees vary on the complexity of the management of the specific funds. As an example, a fund that has an expense ratio of 0.50% would have an annual expense of \$500 on a \$100,000 investment. These fees are in addition to the fees paid by the client to MAXadvisor Private Management.





ITEM 5 - FEES & COMPENSATION (CONTINUED)

Performance figures quoted by mutual fund companies in various publications are after their fees have been deducted. MAXadvisor's performance reports are net of all fees charged by fund companies and brokers to buy and sell funds.

Client equity assets are invested primarily in no-load or load-waived mutual funds and exchange traded funds (ETFs) and fixed income assets are invested within mutual funds, CDs and other instruments. Some mutual funds we utilize are deemed to be "Institutional Class" funds due to their reduced annual expenses provided to investment advisors that have substantial holdings with the fund company.

The underlying expense in a recommended fund is very important and a determining factor for the advisor in recommending the funds to the client. MAXadvisor favors these lower expense investments where applicable for our clients. These expenses are disclosed in the fund prospectus or can often be viewed on the mutual fund's website. Occasionally a client fund will have above average expenses if we expect the fee will decline over time or if the unique investment opportunity offered by the fund warrants the higher cost.





ITEM 6 - PERFORMANCE-BASED FEES & SIDE-BY-SIDE MANAGEMENT

Performance-based fees are fees that are based on a share of capital gains or capital appreciation of a client's account. Side-by-side management refers to the practice of managing accounts that are charged performance-based fees while at the same time managing accounts that are not charged performance based fees.

MAXadvisor does not charge any performance-based fees or participate in side-by-side management. Our fees are described in the *Fees and Compensation* section above, and are not charged on the basis of share of capital gains upon, or capital appreciation of, the funds in your advisory account.

MAXadvisor 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. However, the nature of asset-based fees allows MAXadvisor to participate in the growth of the client's wealth. This also means that our fees can decline when the client's portfolio declines in value.





ITEM 7 - TYPES OF CLIENTS

MAXadvisor provides portfolio management services to individuals, high-net-worth individuals, and small businesses and corporations. MAXadvisor does not require a minimum dollar value of assets under management for portfolio management, but we do impose a minimum quarterly fee of \$750, as described in *Fees and Compensation* section above.





ITEM 8 - METHODS OF ANALYSIS, INVESTMENT STRATEGIES & RISK OF LOSS

MAXadvisor believes in the benefits of diversification. While diversification can help to lower a portfolio's overall volatility (significant price changes), investing in securities always involves a risk of loss that clients should be prepared to bear.

Moreover, owning different types of investments - even out-of-favor or attractively priced investments - may not reduce losses if the majority of asset classes and specific investment categories decline together.

Individual client risk tolerance and risk capacity are also important factors in the portfolio building process, but our own ability to judge a client's risk tolerance in different market environments and match them to our estimation of a portfolio's evolving risk level may be imperfect. We generally believe the market becomes less risky the more it falls, while clients may feel the market is becoming more risky during down periods and may experience declining risk tolerances when our portfolio strategy is taking on more risks.

Investing in securities involves risk of loss that you should be prepared to bear. We do not represent or guarantee that our services or methods of analysis can or will predict future results, successfully identify market tops or bottoms, determine good or bad times to invest in a fund or category, or insulate clients from losses due to market corrections or declines.

We cannot offer any guarantees or promises that your financial goals and objectives will be met. Past performance is in no way an indication of future performance. Past favorable risk and return characteristics of MAXadvisor portfolios may not repeat in future up and down markets even when following the same overall strategy.

MAXadvisor typically recommends professionally managed investment products like low-cost mutual funds and exchange traded funds (ETFs).





**ITEM 8 - METHODS OF ANALYSIS, INVESTMENT STRATEGIES
& RISK OF LOSS (CONTINUED)**

Certain funds we recommend are passively managed, others are actively managed. As with any investment, past performance is no guarantee of future results for mutual funds and ETFs. Costs often do affect investment performance, so MAXadvisor attempts to use no-load, low-cost products whenever possible, such as index funds and ETFs - though in some fund categories we will use actively managed funds that can be more expensive than available index funds. Clients should always review and understand an investment's key literature such as a prospectus and annual report.

Our primary strategy is to take long-term positions (over one year) in these investments, although short-term positions (less than one year but generally greater than 30 days) occur. We do not anticipate significant short term trading (less than 30 days).

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, among others:

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. This risk may be heightened at MAXadvisor compared to other advisors as we have historically allocated significant client assets to longer term, high duration, bond funds.

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.





**ITEM 8 - METHODS OF ANALYSIS, INVESTMENT STRATEGIES
& RISK OF LOSS (CONTINUED)**

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 a 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.

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.

Index Sampling Risk: The chance that the securities selected for the fund, in the aggregate, will not provide investment performance matching that of the Index.

Manager Risk: Poor security selection could cause the fund to underperform relevant benchmarks or other funds with a similar investment objective.





**ITEM 8 - METHODS OF ANALYSIS, INVESTMENT STRATEGIES
& RISK OF LOSS (CONTINUED)**

Emerging Markets Risk: Stocks of companies located in emerging markets could be more volatile and less liquid than the stocks of companies located in more developed foreign markets.

In addition to these risks, our strategies and investments may have unique and significant tax implications. However, unless we specifically agree otherwise, and in writing, tax efficiency is not our primary consideration in the management of your assets. Regardless of your account size or any other factors, we strongly recommend that you continuously consult with a tax professional prior to and throughout the investing of your assets.





ITEM 9 - DISCIPLINARY INFORMATION

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of MAXadvisor or the integrity of MAXadvisor's management.

MAXadvisor, LLC and its management have no disciplinary history that is applicable to this item as the firm and managers have faced no legal or disciplinary matters.





ITEM 10 - OTHER FINANCIAL INDUSTRY ACTIVITIES & AFFILIATIONS

Registered investment advisers are required to disclose affiliations or arrangements with brokers-dealers that are material to their advisory business or may create a conflict of interest for their clients. MAXadvisor has no such financial relationships.

We are a fee-only financial advisor and do not receive payments from any broker or advisor. We have arrangements with different broker dealers wherein we manage client accounts and discuss client account related issues with the custodian. These arrangements often include features we deem to be beneficial to clients, such as access to institutional-class and load-waved mutual funds. We may favor these brokers over brokers that do not offer these benefits.

MAXadvisor Private Management recommends but does not require that investment management accounts utilize the custodial and brokerage services of TD Ameritrade Institutional ("TDAI"). TDAI is a nationally recognized discount broker-dealers which offer quality custody, record keeping and reporting services. MAXadvisor Private Management has the ability to receive client information from TDAI through computer down/uploading and access to TDAI's proprietary investment management website, in order to facilitate MAXadvisor Private Management in its ongoing review of clients' accounts. TDAI also offers clients the ability to have their investment management fee automatically deducted from the account, thus alleviating the client's need to write a check or give specific instructions at each payment period.

MAXadvisor Private Management has no material arrangements with a related person who is a broker-dealer, investment company, other investment advisor, financial planning firm, commodity pool operator, commodity trading adviser or futures commission merchant, banking or thrift institution, accounting firm, law firm, insurance company or agency, pension consultant, real estate broker or dealer, or an entity that creates or packages limited partnerships.



MAXADVISOR PRIVATE MANAGEMENT

4949 NE 16th AVE UNIT D PORTLAND, OR 97211-5000 PHONE/FAX: 888-871-7307

A Registered Investment Adviser



ITEM 11 - CODE OF ETHICS

MAXAdvisor has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at MAXAdvisor must acknowledge the terms of the Code of Ethics annually, or as amended.

MAXAdvisor anticipates that, in appropriate circumstances, consistent with clients' investment objectives, it will cause accounts over which MAXAdvisor has management authority to effect, and will recommend to investment advisory clients or prospective clients, the purchase or sale of securities in which MAXAdvisor, its affiliates and/or clients, directly or indirectly, have a position of interest.

Subject to satisfying this policy and applicable laws, officers, directors and employees of MAXAdvisor and its affiliates may trade for their own accounts in securities which are recommended to and/or purchased for MAXAdvisor's clients. The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of MAXAdvisor will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts.

Under the Code certain classes of securities have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of MAXAdvisor's clients. Because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee.





ITEM 11 - CODE OF ETHICS (CONTINUED)

Conflicts of interest between MAXadvisor and its clients are reduced as MAXadvisor clients primarily own mutual funds and ETFs which create and redeem shares and therefore do not move significantly from client trading behavior. Some closed end funds owned by clients have a fixed number of shares and in these rare cases our code restricts trading in close proximity to client trading activity for less liquid or thinly traded closed-end funds.

It is MAXadvisor's policy that the firm will not affect any principal or agency cross securities transactions for client accounts. MAXadvisor will also not cross trade between client accounts. Principal transactions are generally defined as transactions where an adviser, acting as principal for its own account or the account of an affiliated broker-dealer, buys from or sells any security to any advisory client. A principal transaction may also be deemed to have occurred if a security is crossed between an affiliated hedge fund and another client account.

An agency cross transaction is defined as a transaction where a person acts as an investment adviser in relation to a transaction in which the investment adviser, or any person controlled by or under common control with the investment adviser, acts as broker for both the advisory client and for another person on the other side of the transaction. Agency cross transactions may arise where an adviser is dually registered as a broker-dealer or has an affiliated broker-dealer.





ITEM 12 - BROKERAGE PRACTICES

MAXAdvisor clients have the option of authorizing MAXAdvisor to have limited trading authority over their accounts, meaning MAXAdvisor can place buy and sell orders without obtaining specific client consent for a particular transaction (but overall consent to this service must be given in advance by the client, and this service will only be used for the convenience of the client).

MAXAdvisor will not have the authority or ability to add cash to a client's account or to redeem funds (make withdrawals) except to and from an external account the client has linked to the brokerage account that MAXAdvisor has limited trading authority over and which the client directs us to transfer funds between.

MAXAdvisor bases buy and sale decisions solely on what is best for the client. Any fees or commissions from trading or owning fund shares goes to the broker or fund company – MAXAdvisor only earns money from advisory fees charged directly to the client. MAXAdvisor has no quid pro quo, kickback, or fee sharing arrangements with any broker or advisor. MAXAdvisor reserves the right to negotiate discounted fees for clients based on volume of business MAXAdvisor represents and any fee breaks or discounts will be passed along to clients.

MAXAdvisor has no relationships with fund management companies that would or could lead to MAXAdvisor favoring one fund family over another.

MAXAdvisor recommends brokers based on fees associated with trading and the availability of mutual funds and ETFs. We receive no research or other products or services ("soft dollar benefits") from any broker dealer. MAXAdvisor may benefit from electronic delivery of client information, electronic trading platforms and other services provided by custodians for the benefit of clients. MAXAdvisor may also benefit from other services provided by custodians such as research, continuing education, and practice-management advice. These benefits are standard in a relationship with these custodians and are not in return for client recommendations or transactions.



MAXADVISOR PRIVATE MANAGEMENT

4949 NE 16th AVE UNIT D PORTLAND, OR 97211-5000 PHONE/FAX: 888-871-7307

A Registered Investment Adviser



ITEM 12 - BROKERAGE PRACTICES (CONTINUED)

Some clients may instruct MAXAdvisor to use one or more particular brokerage or custodians for the transactions in their accounts. Clients who may want to direct MAXAdvisor to use a particular broker should understand that this may prevent us from effectively negotiating brokerage compensation on their behalf. This arrangement may also prevent MAXAdvisor from obtaining the most favorable net price and execution. Thus, when directing brokerage business, clients should consider whether the commission expenses and execution, clearance and settlement capabilities that they will obtain through their broker are adequately favorable in comparison to those that MAXAdvisor would otherwise obtain for its clients.





ITEM 13 - REVIEW OF ACCOUNTS

All model portfolios on which managed accounts are based are reviewed continuously and under the supervision of Jonas M. Ferris. All managed accounts will be reviewed for transaction accuracy after any trades are made by a partner in the firm. All accounts will be reviewed periodically for proper asset allocation. Minimizing commissions and taxes plays a role in how often a client account is repositioned.

MAXadvisor will prepare reports to clients on a quarterly basis which contains portfolio performance information and current holdings summary. These reports might also contain a letter outlining opinions on general market outlooks and potential changes in strategy (though changes in strategy can also happen between reports with no notification to clients). Account statements will be mailed or made available online by the account custodian on regular basis.





ITEM 14 - CLIENT REFERRALS & OTHER COMPENSATION

Registered investment advisers are required to disclose compensation paid for client referrals and any conflict of interest that may arise from this relationship. MAXadvisor does not compensate anyone, directly or indirectly, for client referrals. MAXadvisor does not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.





ITEM 15 - CUSTODY

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. MAXadvisor urges you to carefully review such statements and compare such official custodial records to the account statements that we may provide to you. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

As paying agent for our firm, the independent custodian will directly debit your account(s) for the payment of our advisory fees based on your initial standing, written authorization. This ability to deduct our advisory fees from your accounts may cause our firm to be considered as exercising limited custody over your funds or securities. We do not have physical custody of any of your funds and/or securities. Your funds and securities will be held with a bank, broker-dealer, or other independent, qualified custodian. We will only deduct fees as provided by your written authorization. You will receive a bill showing the fee, the value of your assets on which the fee is based, and the specific manner in which the fee is calculated.

MAXadvisor managed accounts may include those “held away” at a clients employer sponsored 401(k) or other custodian. MAXadvisor will manage “held away” accounts only if doing so does not constitute custody.





ITEM 16 - INVESTMENT DISCRETION

MAXAdvisor receives discretionary authority from the client at the outset of an advisory relationship by signature on brokerage application forms and/or management contracts to select the identity and amount of securities to be bought or sold. MAXAdvisor 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. 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. Discretionary authority does not give MAXAdvisor the ability to withdraw funds or securities from clients' account. In all cases such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account.

Clients must sign a limited power of attorney before MAXAdvisor is given discretionary authority. The limited power of attorney is included in the qualified custodian's account application for our main custodians. For accounts not held with our main custodians, clients may sign a separate limited power of attorney document giving discretionary authority to MAXAdvisor.

When selecting securities and determining amounts, MAXAdvisor observes the investment policies, limitations and restrictions of the clients for which it advises. Investment guidelines and restrictions must be provided to MAXAdvisor in writing.

While trades are planned based upon an advisor's judgment of the likely value of asset classes at the end of trading on the exchanges (i.e., typically 4:00 PM Eastern Time, the time when trades in mutual funds are executed under SEC rules), it is possible that late-session movements in the values of asset classes may occur, which may cause either an under-purchase or over-purchase of stock mutual funds or stock ETFs in a client's account relative to the desired target for a particular asset class.

The client is not bound and may end the discretionary authority or the advisor at any time. This Agreement will continue until terminated by either party. Termination of the Agreement must be made in writing.



MAXADVISOR PRIVATE MANAGEMENT

4949 NE 16th AVE UNIT D PORTLAND, OR 97211-5000 PHONE/FAX: 888-871-7307

A Registered Investment Adviser



ITEM 17 - VOTING CLIENT SECURITIES

As a matter of firm policy and practice, MAXadvisor does not have any authority to and does not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. MAXadvisor may provide advice to clients regarding the clients' voting of proxies.

Clients will receive proxies or other solicitations directly from their broker-dealer/custodian.





ITEM 18 - FINANCIAL INFORMATION

MAXadvisor does not require the prepayment of over \$500, six or more months in advance. MAXadvisor has no financial commitment that impairs our ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding at any time.





ITEM 19 - REQUIREMENTS FOR STATE-REGISTERED ADVISORS

Jonas Ferris and Jim Skahan are the members of MAXadvisor, LLC. Information on Jonas Ferris and Jim Skahan's background, education, and qualifications is contained in a supplement to this brochure. You should receive both the brochure and the supplement.





BROCHURE SUPPLEMENT (PART 2B OF FORM ADV)

MARCH 27TH, 2023

JONAS M. FERRIS, PARTNER, MAXADVISOR, LLC

This brochure supplement provides information about Jonas M. Ferris that supplements the MAXadvisor, LLC brochure. You should have received a copy of that brochure. Please contact us at 888-871-7307 if you did not receive MAXadvisor, LLC brochure or if you have any questions about the contents of this supplement.

Additional information about Jonas M. Ferris is available on the SEC's website at www.adviserinfo.sec.gov. Client(s) can search this site by a unique identifying number, known as a CRD number. The Individual CRD number for Jonas Ferris is 2377112.

ITEM 2 - EDUCATIONAL BACKGROUND & BUSINESS EXPERIENCE

Name: Jonas Max Ferris
Year of Birth: 1971

EDUCATIONAL BACKGROUND

University of Georgia (1995 – 1997 MBA)
Manhattanville College (1990 – 1993 BA Economics)

BUSINESS EXPERIENCE

Partner, MAXadvisor, LLC (2002-present)
Co-founder MAXfunds.com (1999-present)
Co-founder, Partner Third Millennium Investment Advisors (1998-1999)

EXAMINATIONS

Passed NASD series 7, 6, 63, 65





PART 2B OF FORM ADV (CONTINUED)

ITEM 3 - DISCIPLINARY INFORMATION

Jonas M. Ferris possesses no disciplinary history required to be disclosed by the U.S. Securities and Exchange Commission or the Oregon Department of Consumer and Business Services.

ITEM 4 - OTHER BUSINESS ACTIVITIES

Contributor Fox News (2001-present)

ITEM 5 - ADDITIONAL COMPENSATION

Mr. Ferris does not receive any additional compensation for providing advisory services beyond that received as a result of his capacity as Managing Member of MAXadvisor, LLC.

ITEM 6 - SUPERVISION

MAXadvisor Private Management's day-to-day operations are supervised by the company's principals, Jim Skahan and Jonas Ferris.

ITEM 7 - REQUIREMENTS FOR STATE-REGISTERED ADVISORS

Jonas Ferris is required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of him. There is no information applicable to this item.





BROCHURE SUPPLEMENT (PART 2B OF FORM ADV)

MARCH 27TH, 2023

JAMES PAUL SKAHAN, PARTNER, MAXADVISOR, LLC

This brochure supplement provides information about James P. Skahan that supplements the MAXAdvisor, LLC brochure. You should have received a copy of that brochure. Please contact us at 888-871-7307 if you did not receive MAXAdvisor, LLC brochure or if you have any questions about the contents of this supplement.

Additional information about James P. Skahan is available on the SEC's website at www.adviserinfo.sec.gov. Client(s) can search this site by a unique identifying number, known as a CRD number. The Individual CRD number for Jim Skahan is 4630127.

ITEM 2 - EDUCATIONAL BACKGROUND & BUSINESS EXPERIENCE

Name: Jim Skahan
Year of Birth: 1969

EDUCATIONAL BACKGROUND

Manhattanville College (1988 – 1992)

BUSINESS EXPERIENCE

Partner, MAXAdvisor, LLC (2002-present)
Co-founder MAXfunds.com (1999-present)

EXAMINATIONS

Passed NASD series 65





PART 2B OF FORM ADV (CONTINUED)

ITEM 3 - DISCIPLINARY INFORMATION

Jim Skahan possesses no disciplinary history required to be disclosed by the U.S. Securities and Exchange Commission or the Oregon Department of Consumer and Business Services.

ITEM 4 - OTHER BUSINESS ACTIVITIES

None.

ITEM 5 - ADDITIONAL COMPENSATION

Mr. Skahan does not receive any additional compensation for providing advisory services beyond that received as a result of his capacity as Managing Member of MAXadvisor, LLC.

ITEM 6 - SUPERVISION

MAXadvisor Private Management's day-to-day operations are supervised by the company's principals, Jim Skahan and Jonas Ferris.

ITEM 7 - REQUIREMENTS FOR STATE-REGISTERED ADVISORS

Jim Skahan is required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of him. There is no information applicable to this Item.

