

401(k)lub ADVISORS

www.401klub.com

March 29, 2024

This brochure provides information about the qualifications and business practices of 401klub Advisors LLC or “401(k)lub Advisors”. If you have any questions about the contents of this brochure, please contact us at (801) 916-1040 and/or Jake@401klub.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or by any state securities authority.

Additional information about 401(k)lub is available on the SEC’s website at www.advisorinfo.sec.gov.

References herein to 401(k)lub Advisors LLC as a “registered investment advisor” or any reference to being “registered” does not imply a certain level of skill or training.

Item 2: Material Changes

Since first filing of the Form ADV Part 2A for 401(k)lub Advisors in 2023, there is nothing materially new to report other than an increase in the number of clients we serve as outlined in Item 4. In the future, any material changes made during the year will be reported here.

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Item 4: Advisory Business

401(k)lub Advisors is an investment advisor registered with the state of Utah under the Investment Advisors Act of 1940, as amended (the “advisors Act”), with its principal place of business at 3937 Uniondale Court South Jordan, UT 84009. 401(k)lub commenced operations as an investment advisor on Sep. 1, 2023.

401(k)lub Advisors is 100% owned by Jacob Z. Rushton. Mr. Rushton serves as the Chief Compliance Officer and has over 18 years of experience.

401(k)lub Advisors offers employers services to support their workplace retirement plans.

Plan-Level Consulting Services

401(k)lub Advisors provides services to retirement plans including 401(k) plans, 403(b) plans, pension and profit-sharing plans, cash balance plans, and deferred compensation plans. 401(k)lub Advisors may act as either:

1. Limited Scope 3(21) Fiduciary. 401(k)lub Advisors may act as a limited scope 3(21) fiduciary that can advise, help and assist plan sponsors with their investment decisions. The plan sponsor is still ultimately responsible for the decisions made in their plan, though using The Firm can help mitigate that plan sponsor’s liability by following a diligent process.
2. 3(38) Investment Manager. 401(k)lub Advisors can also act as an ERISA 3(38) Investment Manager in which it has discretionary management and control of a given retirement plan’s assets. The Firm would then become solely responsible and liable for the selection, monitoring and replacement of the plan’s investment options.

401(k)lub Advisors will provide its clients a quarterly report of the completed fiduciary tasks, planned updates as well as an investment scoring report. These reports will be delivered electronically with the option for a follow up meeting to review the results.

401(k)lub Advisors does not offer individual financial planning or asset management outside the scope of a retirement plan.

Participant-Level Consulting Services

Participant Education and Communication - 401(k)lub Advisors will periodically provide education, presentations, webinars, or written investment materials. Information provided may include a description of investment options provided by the plan recordkeeper.

Client Tailored Services and Client Imposed Restrictions

We consult with clients initially and on an ongoing basis, through the duration of their engagement with us, to determine risk tolerance, time horizon and other factors that may impact the clients’ investment and/or planning needs. We ensure that clients’ investment and planning recommendations are suitable for their

needs, goals, objectives, and risk tolerance. Clients are able to specify, within reason, any limitations they would like to place on discretionary authority as it pertains to individual securities and/or sectors that will be traded in their account. All such requests must be provided to 401(k)lub Advisors in writing. 401(k)lub Advisors will notify Clients if they are unable to accommodate any requests.

Wrap Fee Programs

We do not participate in wrap fee programs.

Assets Under Management

We began operations in September 2023. As of Dec. 31,2023 we managed approximately \$2,169,271 of client assets under management on a non-discretionary basis.

Item 5: Fees and Compensation

Please note, unless a Client has received this brochure at least 48 hours prior to signing an investment advisory and/or a Financial Planning Agreement (collectively, “Client Contract”), the Client Contract may be terminated by the Client within five (5) business days of signing the Client Contract without incurring any fees. Below is a brief description of our fees, however, you should review your executed Client Contract for more detailed information regarding the exact fees you will be paying.

Retirement Plan Management Services

Our standard advisory fee is based on the market value of the assets under management and is calculated as follows:

Account Value	Annual Advisor Fee	Quarterly Advisor Fee
\$0 - \$999,999	.50%	.125%
\$1,000,000 - \$4,999,999	.40%	.1%
\$5,000,000 and Above	.30%	.075%

The minimum annual fee is \$3,600. This minimum fee covers the standard required fiduciary services we provide to all clients no matter their assets or length of time offering a retirement account. The fiduciary responsibilities cover six areas including: Fiduciary Governance, Plan Design, Fee Structure, Investment Process, Participant Support, Provider Management. Each client will receive a full quarterly report of these areas explaining in detail what is being done to keep in compliance as well as support their employees. This minimum is reached when the account has a balance of \$720,000 at which point the fee will be adjusted to reflect the fee schedule above. This minimum does not apply to cash balance plans. All cash balance plans will be charged the tier fee above based on assets.

In some relationships, we may provide a limited amount of services for a negotiated fee lower than the published rates shown above. For example, 3-38 only service option. The rate and services will be agreed to by both the client and 401klub advisors and it will be outlined in the Advisory Agreement. These fees will still be collected quarterly in arrears as with all other fees.

Advisory fees are directly debited from Client accounts by the recordkeeper on a quarterly basis in arrears. This detail will be explained in the Recordkeeper agreement and will match the 401(k)lub Advisory

Agreement and the above fee schedule. Although unlikely, the Client may choose to pay directly by check. Should this be selected, 401(k)lub Advisors would deliver an invoice following each quarter. This would also be detailed in the 401(k)lub Advisory Agreement.

Accounts initiated or terminated during a calendar quarter will be charged a prorated fee based on the amount of time remaining in the billing period. An account may be terminated with written notice. Upon termination of the account, any unearned fee will be refunded to the Client

The fees explained include all services explained in ITEM 4, Advisory Services. This includes services at the plan and participate level. The 401(k)lub Advisor fees do not include fees to other parties, such as RecordKeepers, Custodians, or Third-Party-Administrators. Additionally, 401(k)lub will not accept any compensation in the form of revenue sharing, commissions, 12b-1 fees, or other compensation.

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

401(k)lub Advisors does not charge any performance-based fees to its Clients. Accordingly, there is no “side by-side” management.

Item 7: Types of Clients

401(k)lub Advisors provides investment management services to qualified retirement plans, specifically 401(k) Plans, 403(b) Plans, 457 Plans, Simple IRA, SEP IRA, Profit Sharing Plans, Cash Balance Plans, Defined Contribution Plans, and Defined Benefit Plans. There is no minimum dollar amount and no minimum number of participants required to start a Plan and utilize 401(k)lub Advisors services. 401(k)lub Advisors, if appointed by the Plan Sponsor, serves as an ERISA 3(38) fiduciary to the Plans that opt to use 401(k)lub Advisors as their investment management.

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

401(k)lub Advisors seeks to provide Clients with investment strategies that both serve a full range of investment horizons and tolerances for investment risk, while keeping costs modest.

Our primary method of investment analysis is Fundamental analysis.

401(k)lub Advisors believes diversification is an essential fundamental principle in effectively managing retirement portfolios. Diversification is applied comprehensively across asset classes, regions, sectors, securities and managers. One of the benefits of diversification at multiple levels is to help guard against the impact of unexpected events. Even in liquid asset classes or strategies, with well-established managers, events can occur that may negatively impact the portfolio. These events include manager changes, style drift or poor execution, diminished liquidity, cash lag where failure to invest cash timely causes tracking error, excessive trading costs, or fund closure.

These methods, options, strategies and investments involve risk of loss to Plan participants, who must be prepared in some cases to bear the loss of their entire investment.

Investment options provided to Plan participants are as follows:

- Risk-based Strategies that are intended to help participants align their risk profile to their investment strategy. Strategies range from Capital Preservation (100% fixed income) to Aggressive (100% equity).
- Age-Based Strategies that are intended to help participants match their investment strategy with a retirement date in the future. Strategies are constructed with years to maturity in increments of 5-years and become more conservative as target date approaches.
- Core Lineup Strategy that includes a series of low-cost mutual funds and a money market option intended for participants who want to construct their own portfolio.
- Managed Account – If available for the Plan, Plan participants can also use a managed account feature that automatically enrolls participants into an investment strategy based on various demographic data provided by the Plan Sponsor.

401(k)lub Advisors, its affiliates and employees are not in the business of providing tax, regulatory, accounting, or legal advice. This brochure and any tax-related statements provided by 401(k)lub Advisors is not intended or written to be used, and cannot be used or relied upon, by any taxpayer for the purpose of avoiding tax penalties. Taxpayers should seek advice based on the taxpayer's particular circumstances from an independent tax professional.

Investing involves risk, including loss of principal, which Clients and Plan participants should be prepared to bear. Asset allocation and diversification does not ensure a profit or protect against a loss. No one particular security, investment product, investment style, strategy or portfolio manager is appropriate for all types of investors. Below are listed some types of risk that are inherent in investing in securities.

- *Market Risk:* A decline in the stock market could depress the prices of equity securities in an investor's portfolio.
- *Interest Rate Risk:* An increase in interest rates or a change in the relationship between different market interest rates could depress the prices of bonds and other fixed-income securities in an investor's portfolio.
- *liquidity Risk:* Securities that are normally liquid may become difficult or impossible to sell at an acceptable price during periods of economic instability or other emergency conditions.
- *Domestic and/or Foreign Political Risk:* Events that occur in the U.S. relating to politics, government, and elections can affect the U.S. markets. Political events occurring in the home country of a foreign company such as revolutions, nationalization, and currency collapse can have an impact on the security.
- *Inflation Risk:* Nations around the globe may be more, or less, prone to inflation than the U.S. economy at any given time. Companies operating in countries with higher inflation rates may find it more difficult to post profits.

Markets can be volatile, and prices of mutual funds and their underlying investments can fluctuate substantially over time. Other factors such as economic and political events also can affect the performance of investments. There is no guarantee that any client or participant will not lose money.

Item 9: Disciplinary Information

401(k)lub Advisors and its Executive Team have not been and are not currently the subject of any material

legal proceedings required to be disclosed in this section.

Item 10: Other Financial Industry Activities and Affiliations

No 401(k)lub Advisors owner or employee is registered, or has an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

No 401(k)lub Advisors owner or employee is registered, or has an application pending to register, as a futures commission merchant, commodity pool operator or a commodity trading advisor.

Jacob Z. Rushton is the Founder of Zeke Digital, a marketing agency. This outside business activity accounts for 50% of his time during trading hours and does not create a conflict of interest.

401(k)lub Advisors only receives compensation directly from Clients via recordkeeper relationships. We do not receive compensation from any outside source. We do not have any conflicts of interest with any outside party.

Recommendations or Selections of Other Investment Advisers

Broker-Dealer or Representative Registration

Neither The Firm nor any of its employees are registered representatives of a broker dealer.

Futures or Commodity Registration

Neither The Firm nor its employees are registered or have an application pending to register as a futures commission merchant, commodity pool operator, or a commodity trading advisor.

Material Relationships Maintained by this Advisory Business and Conflicts of Interest

Neither The Firm nor any of its employees have any relationships or conflicts of interest that are material to its advisory business or clients.

Recommendations or Selections of Other Investment Advisers and Conflicts of Interest

The Firm nor any of its employees recommend or select other investment advisors.

Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

401(k)lub Advisors has adopted a Code of Ethics (the “Code”) pursuant to Rule 204A-1 under the Advisors Act that obligates 401(k)lub Advisors and its related persons to put the interests of 401(k)lub Advisor’s clients before its own interests and to act honestly and fairly in all respects in their dealings with Clients. All of 401(k)lub Advisor’s employees are also required to comply with applicable federal securities laws. Clients or prospective Clients may obtain a copy of the Code by contacting Compliance by email at [jake@401\(k\)lub.com](mailto:jake@401(k)lub.com) or by telephone at (801) 916-1040.

Plans using the 401(k)lub Advisor’s services do not offer individual securities or employer stock as an investment option. Although 401(k)lub Advisor’s makes available to Clients a line-up of mutual funds and

target date funds, it is possible in the course of its investment management activities that 401(k)lub Advisor's may come into possession of confidential or material nonpublic information about issuers, including issuers in which 401(k)lub Advisor's or its related persons have invested or seek to invest at the direction of or on behalf of Clients. 401(k)lub Advisor's prohibits employees from improperly disclosing or using such information for its own benefit or for the benefit of any other person, regardless of whether such other person is a Client. 401(k)lub Advisor's maintains and enforces written policies and procedures that prohibit the communication of such information to persons who do not have a legitimate need to know such information, and to ensure that 401(k)lub Advisor's is meeting its obligations to Clients and remains in compliance with applicable law.

401(k)lub Advisors operates with (3-38) and without (3-21) discretion at the plan level. However, it does not recommend, buy or sell securities for Clients in which 401(k)lub Advisor's or its related persons have a material financial interest. It is possible that 401(k)lub Advisor's employees may invest in the same mutual funds that the 401(k)lub recommends to its Clients. 401(k)lub Advisor's Chief Compliance Officer believes that such transactions do not present a conflict of interest considering the markets and liquidity for the mutual funds or target date funds that 401(k)lub Advisor's recommends as investment options to its Clients. The 401(k)lub Chief Compliance Officer monitors employee compliance with 401(k)lub Advisor's Code of Ethics.

Item 12 Brokerage Practices

Factors Used to Select Custodians and/or Broker-Dealers

401(k)lub Advisors does not have any affiliation directly with a Broker-Dealer. Specific custodian recommendations are made to the Client by their retirement plan recordkeeper.

Research and Other Soft-Dollar Benefits

Our qualified custodian(s) used for investment management may provide us with certain brokerage and research products and services that qualify as "brokerage or research services" under Section 28(e) of the Securities Exchange Act of 1934 ("Exchange Act"). This is commonly referred to as a "soft dollar" arrangement. These research products and/or services will assist us in our investment decision making process. Such research generally will be used to service all of our client accounts, but brokerage charges paid by the client may be used to pay for research that is not used in managing that specific client's account. 401(k)lub Advisors receives a benefit because we do not have to produce or pay for the research, products or services available through the custodian.

Brokerage for Client Referrals

We receive no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

Clients Directing Which Broker/Dealer/Custodian to Use

Clients may custody their assets at a custodian of their choice. Clients may also direct us to use a specific broker-dealer to execute transactions. By allowing Clients to choose a specific custodian, we may be unable to achieve the most favorable execution of Client transaction and this may cost Clients money over using a lower-cost custodian.

Aggregating (Block) Trading for Multiple Client Accounts

Investment advisers may elect to purchase or sell the same securities for several clients at approximately the same time when they believe such action may prove advantageous to clients. This process is referred to as aggregating orders, batch trading or block trading. We do not engage in block trading. It should be noted that implementing trades on a block or aggregate basis may be less expensive for client accounts; however, our trading policy is to implement all client orders on an individual basis. Therefore, we do not aggregate or “block” client transactions. Considering the types of investments we hold in advisory client accounts, we do not believe clients are hindered in any way because we trade accounts individually. This is because we develop individualized investment strategies for clients and holdings will vary. Our strategies are primarily developed for the long-term and minor differences in price execution are not material to our overall investment strategy.

Recordkeepers and their Third-Party Custodians used by 401(k)lub Advisors may block Client trades at their discretion following guidelines set in their agreements prior to engaging their services. .

Item 13: Review of Accounts

Jake Rushton, Founder, CEO and CCO of 401(k)lub Advisors, will work with Clients to obtain current information regarding their assets and investment holdings and will review this information as part of our services.

Retirement plan accounts with recordkeepers will be reviewed regularly on a quarterly basis by Jake Rushton, Founder, CEO and CCO. The account is reviewed with regards to the Client’s investment needs and risk tolerance levels of their employees.. Events that may trigger a special review would be unusual performance, addition or deletions of Client imposed restrictions, excessive draw-down, volatility in performance, or buy and sell decisions from the firm or per Client's needs.

Clients will receive trade confirmations from the recordkeeper(s) for each transaction in their accounts as well as quarterly statements and annual tax reporting statements from their custodian showing all activity in the accounts..

401(k)lub Advisors will provide two reports (FiduciaryRX and FI360) to Clients on a quarterly basis regarding their plan investments and fiduciary duties. Each client will also receive a report from their plan recordkeeper with detailed plan balances. We suggest Clients to compare these reports against the account statements they receive from their custodian.

Item 14: Client Referrals and Other Compensation

401(k)lub Advisors does not receive any referral, product, service, or other economic benefit from any party other than its Clients for providing retirement plan services.

Item 15: Custody

401(k)lub Advisors does not have custody of Client funds, securities, or cash. Our fees are collected in arrears by the plan recordkeeper.

Clients should receive at least quarterly statements from the recordkeeper or other qualified custodian that

holds and maintains Client's investment assets. We urge you to carefully review such statements and compare such official custodial records to the account statements or reports that we may provide to you. Our statements or reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Item 16: Investment Discretion

401(k)lub Advisors provides investment advisory services on a non-discretionary (3-21) and discretionary (3-38) basis to its Plan Clients. Prior to providing its discretionary advisory services to a qualified retirement Plan, 401(k)lub Advisors must be appointed as a 3-38 investment manager by the Plan Sponsor acting as the named co-fiduciary of a qualified retirement Plan and enter into an investment management agreement or other agreement which sets forth the scope of 401(k)lub Advisors' services. In choosing a menu of investments for each Plan Client, 401(k)lub Advisors is deemed to be a "discretionary investment manager" for purposes of ERISA and has the discretion to add or delete funds within each Plan's investment "menu." However, 401(k)lub Advisors does not manage employee accounts with discretion nor does it provide any investment advice to individual Plan participants. Within each Plan, the accounts are managed and controlled solely by each Plan participant who can choose from automated investments or investments of their choosing from the investment menu.

Item 17: Voting Client Securities

401(k)lub Advisors does not vote proxies on behalf of its Clients. The plan recordkeeper forwards all proxies to the plan sponsor for their direction.

Item 18: Financial Information

401(k)lub Advisors does not require prepayment of fees. 401(k)lub Advisors has no financial commitment that is reasonably likely to impair its ability to meet contractual and fiduciary commitments to Clients and has not been the subject of a bankruptcy proceeding.

Item 19: Requirements for State-Registered Advisors

Principal Officers

Jacob Z. Rushton serves as the 401(k)lub Advisor's sole principal. Information about Jacob Z. Rushton's education, business background, and outside business activities can be found on his ADV Part 2B, Brochure Supplement attached to this Brochure.

Outside Business

Jacob Z. Rushton is the Founder of Zeke Digital, a marketing agency. This outside business activity accounts for 50% of his time during trading hours and does not create a conflict of interest.

Performance-Based Fees

Neither 401(k)lub Advisors nor Jacob Z. Rushton is compensated by performance-based fees.

Material Disciplinary Disclosures

No management person at 401(k)lub Advisors has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

Material Relationships That Management Persons Have With Issuers of Securities

401(k)lub Advisors nor Jacob Z. Rushton has any relationship or arrangement with issuers of securities.



401(k)lub Advisors, LLC
3937 Uniondale Court
South Jordan, UT 84009
(801) 916-1040

Dated Mar. 29, 2024

Form ADV Part 2B – Brochure Supplement

For

Jacob Z. “Jake” Rushton - 5202815

Founder, CEO and Chief Compliance Officer

This brochure supplement provides information about Jake Rushton that supplements 401(k)lub Advisors, LLC (“401(k)lub Advisors”) brochure. A copy of that brochure precedes this supplement. Please contact Jake Rushton if the 401(k)lub Advisors brochure is not included with this supplement or if you have any questions about the contents of this supplement.

Additional information about Jake Rushton is available on the SEC’s website at www.adviserinfo.sec.gov which can be found using the identification number 5202815.

Item 2: Educational Background and Business Experience

Jake Rushton

Born: 1982

Educational Background

Bachelors of Science Degree in Economics from the University of Utah - 2006

Business Experience

Global Retirement Partners, LLC: March 2022 to January 2023; IAR

Truenorth Wealth: January 2018 to February 2022; Vice President

GO Invest LLC: March 2018 to January 2020: CEO/CCO/IAR

Health Equity: June 2017 to October 2017; VP of Investments

Allegis Investment Advisors: October 2015 to June 2017; IAR

Allegis Investment Services: October 2015 to June 2017; Registered Representative

GBS Retire: October 2015 to June 2017; Director

Achieve Wealth Advisors: August 2014 to September 2015; CEO/CCO/IAR

Sled Investment Group: July 2014 to September 2015; CFO

Arete Wealth Management: January 2011 to June 2014; Registered Representative

Wealth Navigation: October 2010 to June 2014; CCO

Item 3: Disciplinary Information

No management person at 401(k)lub Advisors, LLC has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

Item 4: Other Business Activities

Jake Rushton is the Founder and CEO at Zeke Digital, a digital marketing agency. These activities account for 50% of his time during trading hours.

Item 5: Additional Compensation

Jake Rushton does not receive any economic benefit from any person, company, or organization, in exchange for providing Clients advisory services through the 401(k)lub Advisors.

Item 6: Supervision

Jake Rushton, as Founder, CEO and Chief Compliance Officer of 401(k)lub Advisors, is responsible for supervision. He may be contacted at the phone number on this brochure supplement.

Item 7: Requirements for State Registered Advisers

Jake Rushton has NOT been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.