

SECURITY FIRST ADVISORS, INC.

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This Brochure provides information about the qualifications and business practices of Security First Advisors, Inc. If you have any questions about the contents of this Brochure, you may contact us at (503) 274-4224 or evan@sfainc.us to obtain answers and additional information. Security First Advisors, Inc. is a registered investment adviser in its home State of Oregon. Our firm is also registered in the States of California, Idaho and Washington. Registration of an investment adviser does not imply any level of skill or training. 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 Security First Advisors, Inc. (CRD No. 117502) is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 – Material Changes

The date of our previous annual update to our Brochure was March 2, 2015.

We will ensure that all current clients receive a Summary of Material Changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year. A Summary of Material Changes is also included with our Brochure on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for Security First Advisors, Inc. is 117502. The Summary of Material Changes is listed as "Exhibit A" to our Brochure. We may further provide other ongoing disclosure information about material changes as necessary and 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 Evan Russell, President of Security First Advisors, Inc. at (503) 274-4224 or evan@sfainc.us. Our Brochure is provided free of charge.

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Item 4 – Advisory Business

A Security First Advisors, Inc. (“SFA” “we” or “us”) is an independent investment advisory firm based in Vancouver, Washington, with an additional office in Portland, Oregon. SFA is registered as an investment advisor firm in the States of Oregon, California, Idaho and Washington. The firm has been in business since 1981 and registered as an investment adviser since 1992. The principal owner is the firm of Russell, Wilkinson & Rerick, Inc., which is owned by Evan Russell, Ronald Wilkinson and Stacy Rerick. Our principal place of business is located in Vancouver, Washington.

B, C We are investment managers with both active and passive investment strategies providing portfolio management for individuals, businesses or institutional clients. We also assist our clients with the selection of other advisors. We invest in both public and private equity securities, warrants, public and private corporate debt securities, certificates of deposit, municipal securities, investment company securities, U.S. Government securities, option contracts and interests in partnership investing. See Item 8 for a description of our investment strategy.

Advice and services are tailored to the stated objectives of the Client(s). We discuss with the Client in detail critically important information such as the Client’s risk tolerance, time horizon, and projected future needs, to formulate an investment strategy. This strategy guides us in objectively and suitably managing the Client’s account. We meet with Clients as needed to review portfolio performance, discuss current issues, and re-assess goals and plans. After Client assets are invested, we continuously monitor their investments and provide advice related to ongoing financial and investment needs. We are objective advisors, and we always put our Clients’ interests first.

Clients may impose restrictions on investing in certain securities and types of securities. We generally have non-discretionary authority over Client funds and we must first obtain Client approval prior to executing any transactions in account(s).

We also provide financial planning services. SFA will gather initial data from the client to determine a scope of work that may include, but is not limited to, education funding analysis, retirement feasibility, estate planning and wealth transfer analysis, pension and profit sharing design and review of any items contained in the comprehensive plan.

D We do not participate in or sponsor any wrap fee programs

E As of March 15, 2016, we are managing approximately \$5,326,496 of Client assets on a non-discretionary basis and no assets (\$0) of Client assets on a discretionary basis. SFA also provides advice and counsel on \$224,424,921 in client assets for which it has no direct supervisory authority.

Item 5 – Fees and Compensation

- A** An asset management fee will be charged on a quarterly basis. This fee may include basic, periodic financial planning services.

Our standard asset management fee schedules are negotiable but will not exceed the following:

Assets Under Management	Annual Fee
\$0 - \$1,000,000	2.00%
\$1,000,001 - \$4,999,999	1.50%
\$5,000,000 - \$9,999,999	1.00%
\$10,000,000 and above	0.50%

SFA also provides financial planning services for a fee that is not associated with asset management. Financial planning services may include, for example, one or more of the services listed below:

- An Inventory of Client Assets
- Analysis of Financial Goals and Needs
- Spending Plans and Cash Management
- Tax Planning
- Home Purchase Analysis
- College Education Funding
- Financial Independence/Retirement Planning
- Portfolio Analysis
- Asset Allocation Strategy
- Sudden Money Coaching
- Assistance with implementation of plans and investments
- Insurance Review
- Estate Planning Review
- Record Keeping
- Instruction for Tracking Income and Expenses

An estimated cost for completing the agreed upon scope of work will be provided to the client in advance at a rate of \$75-\$295 per hour depending on the nature of the work and whether the work is being performed at the Staff, Associate or Partner level.

SFA may also provide project and/or consulting services for a particular task requested by a client. Projects or consultations are generally performed on a one time or limited basis, rather than ongoing. Our project/consulting fee is normally determined with reference to the size and complexity of the scope of work, the estimate of time involvement and the level of personnel (Staff, Associate, or Partner) who will be devoted to a given project. Based on

these particular factors, our project and/or consulting fees may range generally from \$500 - \$7,500. A separate Life/Wealth Letter of Engagement Agreement will specify the work provided by us and the fee to be paid by the client.

In some instances, we may recommend that all or a portion of Client assets be managed by an unrelated Sub-Advisor for active trading. Under these circumstances, we are paid a portion of a Client's advisory fee that is paid to the Sub-Advisor. These arrangements are more fully disclosed in Section 10, below. Active trading accounts may have higher rates, which are determined on an individual basis.

- B** Fees based on hourly rates, or project/consulting work are billed to the clients. All fees for assets under management are deducted from Client accounts. Except for accounts managed through some Sub-Advisors, all fees for assets under management are deducted quarterly in arrears. Fees are paid directly to us from the account by the custodian. Payment of fees may result in the liquidation of Client's securities if there is insufficient cash in the account. The fee is based on the closing market value of the Client's account on the last trading day of the prior quarter.

Market value means the value of all assets in the account. To determine value, securities and other instruments traded on a market for which actual transaction prices are publicly reported shall be valued at the last reported sale price on the principal market in which they are traded (or, if there shall be no sales on such date, then at the mean between the closing bid and asked prices on such date). Other readily marketable securities and other instruments shall be priced using a pricing service or through quotations from one or more dealers. In a situation where less actively traded securities do not have readily available market quotations, the Advisor will take steps to ensure that an appropriate valuation methodology is used to determine the value of the security. In the event the client disputes the value assessed by the Advisor, the Advisor will seek to obtain and document price information from at least one independent source, whether it be a broker-dealer, bank, pricing service or other source.

- C** Clients pay brokerage transaction costs and other charges directly to the custodian. See Item 12. Clients may be required to pay, in addition to SFA's fee, a proportionate share of any Exchange Traded Fund's (ETF) or mutual fund's fees and charges. For example, even a non-profit, no-load, mutual fund's operating expenses are paid out of the fund and are an additional expense incurred by the Client.

Our fees include the time and activities necessary to work with Client's attorney, accountant, or other third parties in reaching agreement on solutions, as well as assisting those third parties in implementation of all appropriate documents. However, we are not responsible for attorney, accountant, or other third party fees charged to a Client as a result of these activities.

- D** Clients pay our investment supervisory and/or management fees quarterly in arrears. Upon termination, accounts will be billed through the last day of service.

Generally, Sub-Advisor fees are also deducted quarterly in arrears. However, certain Sub-Advisors may deduct their fees from client accounts quarterly in advance. Upon termination of an account managed through a Sub-Advisor, any unearned fees are returned pro-rata to the client.

Project/Consulting services generally require a prepayment of fees in the amount of 50% of the project cost up front. The remaining 50% is due and payable upon completion of the project. We will invoice Clients for hourly rate services/projects.

Upon termination of any account or project, prepaid but unearned fees (if any) will be promptly refunded by SFA. Any fees that have been earned by SFA but not yet paid by Client will be immediately due and payable.

A client may terminate any agreement within five business days of signing and all fees will be refunded. After five days any unearned fees for work not yet completed will be refunded. Either party may terminate an agreement by written notice.

E David Inman, an Investment Advisor Representatives of SFA, is also Registered Representatives with Purshe Kaplan Sterling Investments (“PKS”), an independent broker dealer. PKS is not affiliated with SFA.

In addition to his compensation as an investment advisor representative, Mr. Inman also receives compensation when his investment advisory clients purchase securities from Mr. Inman in his capacity as a registered representative of the brokerage firm. Because Mr. Inman will receive compensation when he buys or sells securities for his Clients in his capacity as a registered representative, he may be incentivized to place the trade himself rather than to recommend the use another broker dealer.

Certain Investment Advisor Representatives of SFA are also licensed to sell insurance with multiple independent insurance carriers to include the sale of Life, Long-term care, Health, Disability Insurance and Annuities.

Securities and insurance related business is transacted with advisory Clients, and individuals may receive commissions from products sold to Clients. Clients are advised that the fees paid to SFA for investment advisory services are separate and distinct from the commissions earned by any individual for selling Clients insurance or other securities products. If requested by a Client, we will disclose the amount of commission expected to be paid.

The receipt of commissions by individuals associated with the firm presents a conflict of interest. As fiduciaries we must act primarily for the benefit of investment advisory Clients. As such, we will only transact insurance or securities related business with Clients when fully disclosed, suitable, and appropriate. Further, we must determine in good faith that any commissions paid to our representatives are appropriate. Clients are informed that they are under no obligation to use any individual associated with SFA for insurance or securities products or services. Clients may use any insurance or brokerage firm or agent they choose.

Mr. Russell, as a principal of Russell Wilkinson Rerick, Inc. (RWR), is also a member of SFA Oaks Management, LLC, which is the entity that is the manager of SFA Oaks, LLC. SFA Oaks, LLC was formed to raise capital and purchase for all cash, newly constructed single-family houses to be held as long-term rental properties. SFA Oaks Management, LLC received an organizational fee of one percent of all capital raised from the SFA Oaks, LLC offering and may also receive a management fee of ten percent of all gross revenues generated from the rental properties. As a member of SFA Oaks Management, LLC, Mr. Russell as a principal of RWR may receive a portion of these fees after all outsourced services and expenses are paid. However, to date no portion of these fees have accrued to Mr. Russell. Mr. Russell as a principal of RWR may receive indirect compensation from ownership in SFA Oaks Management, LLC as described above.

Mr. Russell, as a principal of Russell, Wilkinson Rerick, Inc. is also a member of SFA-RO Management, LLC, which is the entity that is the manager of SFA Elkridge, LLC. SFA Elkridge, LLC was formed to raise capital and purchase for all cash, newly constructed single family houses to be held as long-term rental properties. SFA-RO Management, LLC received a due diligence and organizational fee of one percent of all capital raised from the SFA Elkridge, LLC offering and may also receive a management fee of ten percent of all gross revenues generated from the rental properties. As a member of SFA-RO Management, LLC, Mr. Russell as a principal of RWR may receive a portion of these fees after all outsourced services and expenses are paid. However to-date no portion of these fees have accrued to Mr. Russell or RWR. Mr. Russell as principal of RWR may receive indirect compensation from ownership in SFA-RO Management, LLC as described above.

In addition to acting as the manager of SRF Elkridge, LLC, SFA-RO Management, LLC is also the entity that is the manager of Creekwood, LLC. Creekwood, LLC was formed to raise capital and purchase (for cash), land to be developed into single-family residential home building lots. Within eighteen months from inception, these lots are to be sold to residential home builders. SFA-RO Management, LLC will not receive any compensation as a result of initiating the offering, however Creekwood, LLC pays SFA-RO Management LLC an annualized management fee of two percent for all capital raised. As a member of SFA-RO Management, LLC, Mr. Russell may receive indirect compensation due to his ownership in SFA-RO Management, LLC as described above.

Mr. Russell as an investment advisory representative of SFA Inc. may offer membership interests in Creekwood, LLC to his investment advisory clients that are suitable for the offering. In offering these securities to his clients, Mr. Russell may be incentivized to recommend that his investment advisory clients purchase membership interests in Creekwood, LLC rather than other products because of the compensation that he will receive. Mr. Russell will only recommend membership interest in Creekwood, LLC to his clients that are suitable for the investment and in amounts that are consistent with their investment objectives.

Security First Advisors, Inc. is also a member (51% owner) and the manager of SFA Commercial LLC, an Oregon limited liability company. SFA Commercial LLC has commenced a private offering to offer investment certificates of various denominations, interest rates and maturity dates which are unsecured obligations of SFA Commercial LLC.

The proceeds of the offering will be used to pay the expenses of the offering, make commercial loans and provide working capital for SFA Commercial LLC.

Security First Advisors, Inc. as manager of SFA Commercial LLC will receive a monthly management fee equal to .0417% (.5% annualized) of the total of all the outstanding commercial loans made by SFA Commercial LLC. SFA as an owner of SFA Commercial LLC will also be compensated in for of the increase in value, if there is one, of SFA Commercial LLC.

Investment advisor representatives associated with Security First Advisors, Inc. may, from time to time, offer these investment certificates to their investment advisory clients. Evan Russell, Ronald Wilkinson, and Stacy Rerick are all investment advisor representatives associated with Security First Advisors, Inc. and indirect owners of Security First Advisors, Inc. As owners of Security First Advisors, Inc., they may be incentivized to recommend that their investment advisory clients purchase investment certificates in SFA Commercial LLC over other products because of the indirect compensation that they will receive from SFA Commercial LLC management fees and ownership in SFA Commercial LLC. They will only recommend investment certificates in SFA Commercial LLC to their clients that are suitable for the investment and in amounts that are consistent with their investment objectives.

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

We do not charge any performance-based fees for our services. Accordingly, this Item is not applicable to our firm.

Item 7 – Types of Clients

We provide investment advice to individuals, businesses, pension and profit sharing plans, institutional clients and trusts and estates. Because each Client is unique, they must be willing to be involved in the planning and ongoing processes. Such involvement does not have to be time consuming, however we want our Clients to remain informed and have a sense of security about their investments.

We have no minimum investable asset requirements or minimum fees to either begin or maintain a relationship with SFA. We will not turn away a potential client, or terminate the relationship with a current client, based solely on their net worth. However, our investment strategy works best for clients with more than \$300,000 in investable assets.

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

SFA will gather initial data from the client to quantify and qualify a client's needs and goals. Risk tolerance, cash flow needs and time constraints (among other factors) are considered in the portfolio creation process.

We research and analyze securities using, technical, charting, cyclical and fundamental analysis.

Technical analysis involves the analysis of past market data; primarily price and volume. This strategy attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows perceptible patterns, which if identified a prediction can be made. The risk is that markets do not always follow patterns. Relying solely on this method may not work long term.

Charting analysis involves the use of patterns in performance charts. We use this technique to search for patterns used to help predict favorable conditions for buying and/or selling a security. This type of analysis involves using and comparing various charts to predict long and short term performance or market trends. The risk involved in solely using this method is that only past performance data is considered without using other methods to crosscheck data. Using charting analysis without other methods of analysis would be making the assumption that past performance will be indicative of future performance. This may not be the case.

Cyclical analysis involves the analysis of business cycles to find favorable conditions for buying and/or selling a security. This strategy assumes that the markets react in cyclical patterns which, once identified, can be leveraged to provide performance. The risks with this strategy are first, that the markets do not always repeat cyclical patterns, and second, that if too many investors begin to implement this strategy, it changes those very cycles they are trying to take advantage of.

Fundamental analysis involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages. This type of analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

The main sources of information we rely upon when researching and analyzing securities include financial publications, inspection of corporate activities, research materials prepared by others, corporate ratings services, company press releases and filings with the Securities and Exchange Commission. We may employ portfolio management software in order to construct efficient risk and return investment models, that will appropriately correspond to our Clients risk tolerance, and financial goals.

Our primary investment strategies used to implement investment advice given to Clients include long-term (securities held at least one year) and short-term (securities sold within a year) purchases and occasional trading (securities sold within 30 days).

We use our best judgment and good faith efforts in rendering services to Client. However, all investments involve risk of loss that Clients should be prepared to bear. We cannot warrant or guarantee any particular level of account performance, or that accounts will be profitable over time. Not every investment recommendation we make will be profitable. Clients assume all market risk involved in the investment of account assets. Investments are subject to various market, currency, economic, political and business risks.

Except as may otherwise be provided by law, we are not liable to Clients for:

- ❖ Any loss that Clients may suffer by reason of any investment recommendation we made with that degree of care, skill, and diligence under the circumstances that a prudent person acting in a fiduciary capacity would use; or
- ❖ Any act or failure to act by a custodian of Client accounts.

It is the responsibility of the Client to give us complete information and to notify us of any changes in financial circumstances or goals.

Item 9 – Disciplinary Information

We are required to disclose all material facts regarding any legal or disciplinary event that would be material to your evaluation of our firm, or the integrity of our management. No principal or person associated with SFA has any information to disclose which is applicable to this Item.

Item 10 – Other Financial Industry Activities and Affiliations

As disclosed in Item 5E, above, David Inman an Investment Advisor Representative of SFA is also licensed as a Registered Representative with Purshe Kaplan Sterling Investments (“PKS”). PKS is a broker-dealer firm not related to, or affiliated with SFA. Certain Investment Advisor Representatives are also licensed as independent insurance agents.

Mr. Russell as a principal of Russell Wilkinson Rerick, Inc. (“RWR”) is also a member of SFA Oaks Management, LLC which is the entity that is the manager of SFA Oaks, LLC. As a principal of RWR, Mr. Russell is also a member of SFA-RO Management, the acting manager of SRF Elkridge, LLC and Creekwood, LLC. Please also see Items 5, 10, 12 and 14.

Security First Advisors, Inc. is a member and the manager of SFA Commercial LLC. SFA Commercial was formed to raise capital, make, purchase, hold, manage and dispose of short term commercial loans secured by real property. Please also see Items 5, 10, 12 and 14.

We may, on occasion, recommend that all or a portion of a Client’s assets be managed by an unaffiliated Sub-Advisor. Fees charged by a Sub-Advisor will be fully disclosed to Clients. Sub-advisory fees may be deducted directly from Client accounts and may result in increased fees to Client. Clients may be required to execute a limited power of attorney with a Sub-Advisor selected by us.

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

- A** All associates must adhere to the ethics of the Financial Planning Association (FPA) and complete at least 24 hours of continuing education every two years. Associates must have appropriate educational backgrounds and related experience in the fields of investment, pension and estate planning, risk management, and taxation. All investment advisor representatives and associated persons will meet the examination or experience requirements of the state(s) in which they provide investment advisory services.

A copy of the code of ethics is available to any Client or prospective Client upon request. Our Clients or prospective Clients may request a copy of the firm's Code of Ethics by contacting Evan Russell at (503) 274-4224 or evan@sfainc.us.

- B-D** We do not have any management interest or controlling ownership in companies or investments that we advise our Clients to buy.

SFA or individuals associated with our firm may buy and sell some of the same securities for their own account that SFA buys and sells for its Clients. When appropriate we will purchase or sell securities for Clients before purchasing the same for our account or allowing representatives to purchase or sell the same for their own account. In some cases SFA or representatives may buy or sell securities for their own account for reasons not related to the strategies adopted for our Clients. Our employees are required to follow the Code of Ethics when making trades for their own accounts in securities which are recommended to and/or purchased for Clients. The Code of Ethics is designed to assure that the personal securities transactions will not interfere with decisions made in the best interest of advisory Clients while at the same time, allowing employees to invest their own accounts.

SFA will disclose to advisory Clients any material conflict of interest relating to us, our representatives, or any of our employees which could reasonably be expected to impair the rendering of unbiased and objective advice.

As any advisory situation could present a conflict of interest, we have established the following restrictions to ensure our fiduciary responsibilities:

1. A director, officer, associated person, or employee of SFA shall not buy or sell securities for his personal portfolio where his decision is substantially derived, in whole or in part, by reason of his employment unless the information is also available to the investing public on reasonable inquiry. No person of SFA shall prefer his or her own interest to that of the advisory Client.
2. SFA maintains a list of all securities holdings for itself and for anyone associated with its advisory practice who has access to advisory recommendations. An appropriate management person of SFA reviews these holdings on a regular basis.
3. Any individual not in observance of the above may be subject to termination.

Item 12 – Brokerage Practices

A Our Clients' assets are held by independent third-party custodians. Except to the extent that the Client directs otherwise, we may use our discretion in recommending the broker-dealer and/or custodian. The Client is not obligated to effect transactions through any broker-dealer or custodian recommended by us. In recommending broker-dealers and custodians, we will comply with our fiduciary duty to seek best execution and with the Securities Exchange Act of 1934. We will take into account such relevant factors as:

- Price;
- The custodian's facilities, reliability and financial responsibility;
- The ability of the custodian to effect transactions, particularly with regard to such aspects as timing, order size and execution of order;
- The research and related brokerage services provided by such custodian to SFA, notwithstanding that the account may not be the direct or exclusive beneficiary of such services; and
- Any other factors that we consider to be relevant.

Generally speaking, we will recommend that Clients establish a custodial account with SEI Private Trust ("SEI"), so long as SEI continues to meet the above criteria. We work primarily with SEI for administrative convenience and also because SEI offers a good value to our Clients for the transaction costs and other costs incurred. We reserve the right to decline acceptance of any Client account for which the Client directs the use of a particular broker if we believe that this choice would hinder either our fiduciary duty to the Client or our ability to service the account.

SEI provides services which may include research, brokerage, custody, access to mutual funds and other investments that are otherwise available only to institutional investors or would require a significantly higher minimum initial investment. SEI also makes available to SFA other products and services that benefit us but may not directly benefit Client accounts. Some of these other products and services assist us in managing and administering Clients' accounts. These include software and other technology that provide access to Client account data, provide research, facilitate payment of our fees from Client accounts and assist with back-office support, recordkeeping and Client reporting. Many of these services generally may be used to service all or a substantial number of SFA's accounts.

SEI may also provide SFA with other services intended to help us manage and further develop their respective business enterprises. These services may include consulting, publications and presentations on practice management, information technology, business succession, regulatory compliance, and marketing. In addition, SEI may make available, arrange, and/or discount these types of services to SFA by independent third-parties. SEI may discount or waive fees that it would otherwise charge for some of these services, or pay all or a part of the fees charged by a third-party for providing these services to us. The availability of the foregoing products and services is not contingent on SFA committing to SEI any specific amount of business (assets in custody or trading).

SFA is required to periodically evaluate, and has determined in good faith, based on the “best execution” policy stated above that transaction fees are reasonable in relation to the value of the services provided

As previously disclosed in Items 5E and 10 (above), David Inman, an Investment Advisor Representative of SFA, is also a Registered Representative of Purshe Kaplan Sterling Investments (“PKS”) and may receive commissions for effecting securities transactions in Client accounts. Clients are fully informed that certain individuals may receive separate compensation when effecting transactions through PKS. SFA emphasizes to Clients their unrestricted right to select and choose any broker or dealer they wish.

- B** We do not aggregate the purchase or sale of securities for Client accounts. Most trades involve mutual funds and exchange traded funds where trade aggregation does not provide any benefit to our Clients.

Item 13 – Review of Accounts

- A** The frequency of reviews for investment advisory Clients is determined based on the Client's investment objectives. Accounts are generally reviewed quarterly, but in any event, no less than annually.

SFA recommends that financial planning clients have a review either annually or in the event of any substantial change in the client's situation. It is the client's responsibility to notify the SFA of such changes. Recommendations, if any, will be implemented entirely at the client's discretion. However, the client is under no obligation to engage the services of SFA for review. The reviewer will usually be the advisor who originally presented the plan to the client. Advisors will be instructed to review plans to insure that plans conform to generally accepted standards in the financial planning community.

- B** More frequent reviews may be triggered by a change in Client's investment objectives; tax considerations; large deposits or withdrawals; large sales or purchases; loss of confidence in corporate management; or, changes in the economic climate.

- C** Investment advisory Clients receive standard account statements from the custodian of their accounts on a basis generally no less than quarterly. SFA may also provide Clients with periodic written reports summarizing the account activity and performance. Along with these reports, we discuss comparisons to indices performance.

Financial Planning Clients do not normally receive investment reports. Financial Planning Clients can initiate reviews with us if they have changes in their personal circumstances or concerns.

Item 14 – Client Referrals and Other Compensation

As disclosed under Items 5, 10 and 12 above, David Inman a representative of SFA, is licensed as a Registered Representative with PKS, and certain representatives of SFA are also licensed as independent insurance agents. The conflicts of interest these arrangements present and how we deal with these conflicts are described in detail under Section 5E, above.

As disclosed under Item 5 and 10 above Evan Russell may receive indirect or direct compensation in connection with his roles with SFA Oaks Management, LLC (manager for SFA Oaks, LLC), SFA-RO Management, LLC (manager for SFA Elkridge, LLC and Creekwood, LLC), and SFA Commercial LLC. Any client conflicts of interest are mitigated by the fact that clients are under no obligation to participate in the investment opportunities that may be available through either SFA Oaks, LLC, SFA Elkridge, LLC, Creekwood, LLC, or SFA Commercial LLC. Additionally, conflicts are further mitigated by the disclosures provided to all participants in SFA Oaks, LLC, SFA Elkridge, LLC, Creekwood, LLC, and SFA Commercial LLC.

Also disclosed under Items 5 and 10 above, SFA may receive payment in the form of a percentage of asset management fees from a third party Sub-Advisor for referring clients to a Sub-Advisor for active investment management. The conflicts of interest this type of arrangement presents and how we deal with these conflicts are described in detail under Section 10, above.

Disclosed under Item 12, above, SFA may receive “soft dollars” from an unrelated third party custodian or broker-dealer. The conflicts of interest this type of arrangement presents and how we deal with these conflicts are described in detail under Section 12, above.

Item 15 – Custody

Other than the ability to deduct our fees from Client accounts, and as described below, we do not have custody of the assets in the account and shall have no liability to the Client for any loss or other harm to any property in the account, including any harm to any property in the account resulting from the insolvency of the custodian or any acts of the agents or employees of the custodian and whether or not the full amount or such loss is covered by the Securities Investor Protection Corporation (“SIPC”) or any other federal agency or insurance which may be carried by the custodian. For those limited number of Washington based clients that are also participants in the SFA Commercial, LLC private offering, the State of Washington may deem that we have custody of those client assets. Accordingly, an independent annual audit is conducted which is distributed to the members and investors of SFA Commercial, LLC.

Item 16 – Investment Discretion

Generally, Clients grant us non-discretionary authority to execute investment recommendations. Non-discretionary authority requires us to obtain a Client’s approval of each specific transaction prior to executing the investment recommendations.

Item 17 – Voting Client Securities

- A** Without exception, we do not vote proxies on behalf of Clients. Additionally, we will not provide advice to Clients on how they should vote.

- B** We do not have authority to vote Client securities. Clients will receive proxies and other solicitations directly from the custodian or transfer agent. If any proxy materials are received on behalf of a Client, they will be sent directly to the Client or a designated representative of the Client, who is responsible to vote.

Item 18 – Financial Information

- A** Some services do require advisory fees to be paid in advance. However, we do not require or solicit the prepayment of fees more than \$500.00, more than six months in advance from any Client.
- B** We do not have discretionary authority or custody over Client funds or securities. We have no financial commitments that would impair our ability to meet contractual and fiduciary commitments to Clients.
- C** Neither SFA, nor any of the principals, have been the subject of a bankruptcy petition at any time in the past.

Item 19 – Requirements for State-Registered Advisers

- A** The controlling owners, executive officers and management of SFA, include: Ronald E. Wilkinson, Evan S. Russell, and Stacy L. Rerick. The education and background of these individuals are separately detailed in Part 2B, Item 2.
- B** Other Business Activities – See Part 2A, Item 10 (above).
- C** We do not receive performance-based fees.
- D** We have not been subject to any arbitration claims or any other proceedings (civil, self-regulatory organization or administrative).
- E** We have no relationships or arrangements with any securities issuers or otherwise, apart from those listed in Part 2A, Item 10 (above).

Exhibit A – Summary of Material Changes

This Item discusses only specific material changes that have been made to our Brochure since the date of our last annual update, which was March 2, 2015. Since that date we have made the following material changes:

Items 10 and 14 were updated to clarify activities, affiliations, and compensation related to Russell Wilkinson Rerick, Inc., SFA Oaks Management, LLC, SFA-RO Management, LLC, SFA Elkridge, LLC, Creekwood, LLC, and SFA Commercial LLC.

Our principal place of business has changed to our Vancouver office at: 16703 SE McGillivray Blvd., Suite 230, Vancouver, WA 98683.

We will ensure that you receive a summary of any material 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 and 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 Evan Russell, President of Security First Advisors, Inc. at (503) 274-4224 or evan@sfainc.us. Our Brochure is provided free of charge.