



**ITEM 1
COVER PAGE**

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This brochure provides information about the qualifications and business practices of Evard Financial Advisors, PLLC. If you have any questions about the contents of this brochure, please contact us at (480) 442-5816 or info@mefinancial.net. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any State securities authority.

Additional Information about Evard Financial Advisors, PLLC also is available on the SEC's website at www.adviserinfo.sec.gov.

Evard Financial Advisors, PLLC is a Registered Investment Advisor in the State of Arizona. Please note that registration does not imply a certain level of skill or training.

**ITEM 2
MATERIAL CHANGES**

Evard Financial Advisors, PLLC has updated their address.

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ITEM 4 ADVISORY BUSINESS

A. Description of our business Evard Financial Advisors, PLLC (“Evard”) has been a Registered Investment Advisor in Arizona since 2007. Michelle Evard owns it 100%.

B. Description of advisory services we offer Evard has always been a small independent firm specializing in financial planning and managing client portfolios.

Financial planning includes tax planning, insurance planning, retirement planning and estate planning. Financial planning services may include consultations and/or written financial plans, which analyze your financial situation and makes appropriate recommendations for strategies and methods of implementation of the strategies.

NOTE: A conflict exists between the interests of the investment advisor and the interests of the clients and; the client is under no obligation to act upon the investment advisor’s recommendations and; if the client elects to act upon any of the recommendations, the client is under no obligation to affect the transaction through the investment advisor.

When managing client portfolios, we will take under consideration clients financial personal situation, which includes employment status, cash reserves, retirement account values, current age, anticipated retirement date, other sources of income as well as their personal tolerance for risk and volatility. With this information, we will assist clients with developing an appropriate investment strategy. We will monitor and adjust the client portfolios in accordance with the agreed upon investment strategy if we are managing the client’s portfolio.

In managing client portfolios, we utilize 2 methods.

When we manage your accounts, we use only general securities (stocks & bonds), mutual funds (including exchange traded funds or ETFs) and government securities.

If you want to invest in what are being called “alternative investments” such as commodities, managed futures, private equity, currency or hedge funds, we will help you select and monitor other money managers investing in alternative investments.

C. If, or how we tailor our advisory services to your individual needs All of our clients are different, so we tailor our services to meet your needs by consultations to discover your individual hopes, goals and dreams. Then we analyze your current investments and make suggestions how to meet your individual hopes, goals and dreams. Of course, you may impose restrictions on investing in certain securities or types of securities. It is your portfolio, after all. (Please refer to Item 16.)

D. Wrap fee programs Evard does not participate in wrap-fee programs.

E. Amount of assets we manage As of March 16, 2011, Evard managed approximately \$3,500,000 on a non-discretionary basis. This does not include any funds with other money managers.

ITEM 5 FEES & COMPENSATION

A. How we are compensated Evard can work in one of two ways. The negotiable hourly fee is up to \$200/hour and is paid after the consultations.

Second is a written financial plan. Fees range from \$250 to \$2,500, depending on the complexity of your financial situation. Half the negotiable fee is due in advance, the rest upon presentation of the plan, which will always be well within 6 months of our engagement. If you cancel, any prepaid fees will be refunded on a pro-rated basis.

Managed money fees also have 2 components. If we manage your money, the annual negotiable fee for doing so ranges from ½ of 1% to 2%, depending on the size and complexity of your account. The fee is paid quarterly, at the *end* of each quarter.

If we help you select other money managers and we monitor them for you, we will charge you an hourly fee for doing so. No compensation is split or shared with any money manager at any time.

NOTE: Lower fees for comparable services may be available from other sources.

B. How our fees are paid With your signed permission on a Limited Power of Attorney, we can have your custodian withdraw our fees for managing your account at the end of each quarter. Or you may choose to have us bill you at the end of each quarter. It's your choice. Hourly fees are billed at the end of the month they were incurred. For written financial plans, half the fee is payable in advance, the rest upon presentation of the plan. (If you cancel, please see "D" below.)

C. Other types of fees Our fees do not include transaction fees, brokerage commissions and other related costs and expenses, which you will pay. You may also pay fees charged by your custodian, mutual funds and other money managers, including: management fees, custodial fees, mutual fund fees, taxes and transfer fees. We do not receive a portion of any of these fees. Simply put, they are a necessary part of doing business in the securities industry. And please remember that by not charging securities sales commissions, we are keeping your out-of-pocket expenses as low as we possibly can. (Please refer to item 12.)

D. Do we charge in advance We charge only one fee in advance. If we prepare a written financial plan for you, half the fee is due in advance, the rest upon presentation of the plan, which will always be within 6 months of our engagement. If you cancel within 5 business days, you'll get a 100% refund of all written financial planning fees. If you cancel after we have done over half the plan, no refund will be paid. If you cancel after 5 business days and before half the plan is finished, how much of the written financial plan that is actually completed when you cancel will depend on what percentage of the proposed chapters is completed. For example, if there are 10 chapters to be done, and we've completed 3, you'll get a 70% refund.

E. Do we get compensated (commissions) for the sales of securities Evard does not accept commissions or any other form of compensation for *selling* you securities or other investment products. No one at Evard has a securities license. We can & do earn insurance commissions, however.

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

Not applicable

ITEM 7 TYPES OF CLIENTS

Most of our clients are individuals; some are high net worth individuals. We also have business & corporations and small pension clients.

The Firm does not impose any requirements on the minimum account size for opening or maintaining an account.

ITEM 8 METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

A. Our analysis & strategies We don't do technical security analysis. We do fundamental security analysis of a business, which involves analyzing its financial statements & health, its management & competitive advantages, and its competitors & markets. Fundamental analysis is performed on historical & present data, but with the goal of making financial forecasts, including stock price evolution, projection of business performance, management evaluations and credit risks.

We primarily read on-line resources including "The Wall Street Journal", "Financial Times", "Yahoo" and "Business Insider".

We also study corporate rating services such as "Standard & Poors"

YOU SHOULD BE AWARE THAT INVESTING IN SECURITIES INVOLVES RISK OF LOSS THAT YOU SHOULD BE PREPARED TO BEAR.

B. Material risks involved in our analysis or strategies We feel our investment strategy is fairly conservative and we don't believe it involves significant or unusual risks. For example, we do not engage in frequent trading of securities as that can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

C. Do we recommend primarily a particular type of security As mentioned earlier, we place client accounts in general securities (stocks & bonds), mutual funds, and government securities, none of which are customarily considered to involve significant or unusual risk. But, as noted above, investing in securities ALWAYS INVOLVES RISK.

**ITEM 9
DISCIPLINARY INFORMATION**

- A. Criminal or civil actions Inapplicable
- B. Administrative proceeding before The SEC or any other government agency
Inapplicable
- C. Any self- regulatory organization (SRO) proceedings Inapplicable

**ITEM 10
OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS**

- A. Are we registered representatives of a securities broker/dealer No one at Evard is a securities broker/dealer or a securities registered representative.
- B. Are we a futures commission merchant, commodity pool operator or a commodity trading advisor No one at Evard is or ever will be futures commission merchant, a commodity pool operator or a commodity trading advisor or an associated person of the above-mentioned 3 entities.
- C. Do we have any other financial relationships or arrangements that are material to our business Evard Financial Advisors, PLLC retains an independent third-party account administrator (LWI Financial Inc. or “LWIF”) that performs certain services such as account administration, portfolio allocation analysis, asset-class investment strategy, back-office fulfillment, report and statement production, and fee debiting. Such services are paid directly through advisory fees billed to the client or are indirectly paid by Evard Financial Advisors, PLLC. LWIF is an investment adviser registered with the Securities and Exchange Commission.

LWIF may also sponsor educational seminars for the benefit of Evard Financial Advisors, PLLC and its clients. Such educational seminars provide Evard Financial Advisors, PLLC with access to information and ideas regarding practice development, client servicing, investment strategy, relationship management and financial planning. Attendance expenses associated with such educational seminars may be paid or reimbursed, either in whole or in part, by LWIF.

Evard Financial Advisors, PLLC may recommend, where appropriate, that

client invest in shares of the SA Funds - Investment Trust (the "SA Funds"), a family of nine asset class mutual funds advised, managed and administrated by LWIF. Fees are not charged directly upon investments in the SA Funds. LWIF receives certain fees and expenses directly from the SA Funds for its services as disclosed in that Fund's prospectus.

Michelle Evard is a licensed insurance agent in the State of Arizona. She sells insurance products for sales commissions, (but not variable products such as variable annuities). Accordingly, you should be aware that a conflict exists between your interests and our interests; and you are under no obligation to act upon any of our recommendations; and if you elect to act upon any of the recommendations, you are under no obligation to affect the insurance transactions through Evard.

D. Do we recommend other registered investment advisors and receive compensation As noted in Item 5, on occasion, Evard recommends a few other money managers to our clients. They are firms that specialize in investments we do not manage, primarily "alternative investments" like commodities or currency. This helps diversify your investments. We have chosen the other money managers based on their relative costs, skills, reputation, dependability and compatibility with our clients, and NOT upon any financial arrangement between Evard and the money manager. No referral fees or commissions are ever received from another firm.

ITEM 11 CODE OF ETHICS, PARTICIPATION OR INTEREST IN *CLIENT* TRANSACTIONS AND PERSONAL TRADING

A. Describe our Code Of Ethics Our Code of Ethics establishes ideals for ethical conduct based upon fundamental principles of openness, integrity & trust. It ensures that we always put your interests first. We hold ourselves to high standards and diligence. Taken as a whole, our Code of Ethics is our promise to work hard in your interests, with complete confidentiality and honesty. We will immediately provide a copy of our Code of Ethics to any client or prospective client upon request.

B. Do we have any material financial interests in investments we recommend We will not recommend an investment to you in which we have a material financial interest. We do not act as a principal and buy securities from, or sell securities to clients. We are not general partners in a partnership so we will not solicit your investments for such. We are not investment advisors to any investment company, so we will not solicit your investments for such.

C. Do we invest in securities we recommend to you On occasion, we may buy or sell securities we recommend to you. If we like it for ourselves, why shouldn't our clients like it too, always depending on their investment goals, objectives and time frame. When we recommend investments we hold ourselves, we'll always disclose to you what we own and how much we own. We feel that there is just a tiny conflict of interest in owning the same securities as we recommend to you because the securities we recommend are widely held and publicly traded and we are too small advisors/investors to affect the market in widely held and publicly traded securities.

D. Do we buy or sell securities about the same time as you No. In addition, we do not allow "front running" (buying or selling before you), or buying or selling securities contemporaneously with you. Fees the other money managers charge vary somewhat, we cannot detail them here. Their fees will be fully disclosed when we describe money managers we feel would be appropriate for you. We do not accept referral fees and make no commission from choosing investments or managers.

ITEM 12 BROKERAGE PRACTICES

A. Describe the factors we used in selecting a custodian for you We have selected an account administrator based on its:

- Costs: Average cost with exceptional customer service, software and reporting
- Skills: Very few mistakes
- Reputation: Positive reviews from others in the industry
- Dependability: Timely turnaround
- Compatibility with you: This administrator deals mainly with small independent RIAs like us.

1. Soft dollars We don't do "soft dollars". A good example would be if a custodian offered us research or other benefits to place our clients with them.

2. Brokerage for client referrals We don't do "brokerage for client referrals". By that we mean we haven't selected our custodian on the basis that it will send us other client referrals in exchange for your custodial business.

3. Directed brokerage We don't do "directed brokerage". That means we don't recommend, request or require that you direct us to execute

transactions through a specified broker/dealer.

B. Aggregating client accounts We rarely have the opportunity to “aggregate” the purchase or sale of securities for you. We’re an independent RIA that doesn’t buy or sell securities very often (a practice which saves you money). More importantly, all our clients are different in age, size of portfolio, wants & needs and risk taking, so there is very little overlap in our client portfolios.

ITEM 13 REVIEW OF ACCOUNTS

A. Frequency & nature of reviews We review managed accounts weekly. We review financial planning accounts annually. Accounts at other money managers are reviewed when we receive their statements from you. All accounts are reviewed Michelle Evard. She reviews on a portfolio analysis basis.

B. Reviews on an other than periodic basis On occasions, such as a dramatic market move (in either direction), retirement or any catastrophe, we review client accounts to ascertain if we need to make appropriate repositioning moves for you.

C. Client reports We do not prepare regular client *reports*. At the end of each quarter we receive a computerized invoice from your custodian detailing your quarterly activity. We then review the invoice and check the calculations. Your custodian sends you account statements, transaction confirmations, all applicable tax documents, required minimum distributions form any qualified plans, and proxy documents, including ballots and any communication from public companies. In addition, you also receive statements from any mutual funds you may own and other money managers you may utilize. We will, from time-to-time, download updates on your account to present to you at meetings or email you about. These reports are not official statements and may be run any day we choose.

ITEM 14 CLIENT REFERRALS AND OTHER COMPENSATION

A. Do we get economic benefits from a non-client for providing certain advice to you No. In addition, we do not accept sales awards or other prizes, such as trips.

B. Do we pay for client referrals We do not *pay* for client referrals. We also do not get paid for giving referrals.

**ITEM 15
CUSTODY**

Inapplicable

**ITEM 16
INVESTMENT DISCRETION**

We manage your accounts on a non-discretionary basis. Meaning we are not allowed to trade on your account without your consent. When we meet, we sign off on a standard allocation to follow. To deviate from this allocation, we simply require an email or signed, faxed letter from you authorizing us to do so. We will then contact the money manager on your behalf to execute the trades. We are a firm built on *relationships* not *transactions*. As a small independent RIA we don't trade your accounts very often, so it is not difficult to check with you before we make any buys or sells in your account.

In order for you to have an account with us, we must first have you authorize it with a Limited Power of Attorney, which your custodian provides to you. Before executing the power of attorney, the custodian insures that your signed contract with us authorizes us to have certain privileges and these are then initialed on your new account form. You may authorize us to open the account, authorize us to maintain your asset allocation, authorize us to receive duplicate confirmations & statements and authorize the custodian to deduct our fees from your account.

**ITEM 17
VOTING *CLIENT* SECURITIES**

A. Do we accept authority to vote client securities We do not vote client securities

B. If we do not have that authority, disclose that fact We do not have the authority to vote client securities. You will receive your proxies or other solicitations directly from your custodian and we encourage you to discuss them with your legal representatives as we not in a position to answer any of your questions regarding proxies.

ITEM 18
FINANCIAL INFORMATION

A. Do we require prepayment of fees of more than \$500/ more than 6 months in advance No, we never charge more than \$500 more than 6 months in advance.

B. If we require such prepayment, or have custody or discretion, is there any impairment for us to make a refund, if necessary Since we do not have discretionary authority of your funds and/or securities, there is no impairment to make a refund. We also do not charge any fees in advance whether we manage your money or not.

C. Bankruptcy Neither Michelle Evard nor Evard Financial Advisors, PLLC has ever filed for bankruptcy.

ITEM 19
REQUIREMENTS FOR STATE REGISTERED ADVISORS

A. Our education & business backgrounds Principal Officer of Evard Financial Advisors, PLLC is Michelle Evard.

Michelle Evard was born in 1976. She has a BA in International Studies from Miami University (1998). During the past 6 years she has been owner of Evard Financial Advisors, PLLC, a Arizona Registered Investment Advisor (2005 to present). She received her CFP Designation in 2008. She was a financial planner for Abercrombie & Fitch (1999-2003), a sales representative for Condit West Creative, a graphic design firm (2003-2003), an insurance agent with Freepoint Wealth Management (2004-2004) and Creative Wealth Group (2004-2004), a loan officer with Great Southwest Mortgage (2005-2006) and American Mortgage Group (2006 to 2009), a securities registered representative with The ON Equity Sales Co.(2004 to 2009) and an independent insurance agent (2004 to present). Michelle has never had any legal or disciplinary events.

B. Any other business activities

Michelle Evard is co-owner of BeautyatSkinDeep.com with her mother. BeautyatSkinDeep.com is e-commerce store that sells skin care and general beauty products. This profession takes up about 10% of Michelle's workweek.

C. Performance-based fees Evard does not charge performance-based fees.

D-1. Arbitration Michelle Evard has never been involved in *arbitration* of any kind.

D-2. Civil or administrative proceedings Michelle Evard has never been found liable in a *civil, self-regulatory organization, or administrative proceeding* of any kind.

E. Relationship with issuer of securities We do not have any relationships with issuers of securities

*Michelle Evard received her CFP designation in 2007. At that time a candidate was required to pass 5 tests on 5 different financial planning topics, as well as a final exam on all topics. In addition, 3 years of relevant experience and a college degree were required.