

# Pollock Planning Associates, Inc.

## **ADV Part 2A, Firm Brochure Dated: February 07, 2022**

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**This Brochure provides information about the qualifications and business practices of Pollock Planning Associates, Inc. If you have any questions about the contents of this brochure, please contact us at 856-266-2276 or [spollock15@gmail.com](mailto:spollock15@gmail.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.**

**Additional information about Pollock Planning Associates, Inc. is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

**References herein to Pollock Planning Associates, Inc. as a “registered investment adviser” or any reference to being “registered” does not imply a certain level of skill or training.**

## **Item 2           Material Changes**

There has been one material change made to this Brochure since Pollock Planning Associates’ last Annual Amendment filing made on March 2, 2021 as follows:

- At Item 4 to disclose Pollock Planning’s new fiduciary status per the Department of Labor rulemaking.

In addition to the above material change, Pollock Planning has made disclosure changes, enhancements and additions at Items 4, 5, 7, 8, 10, 12, 14 and 15 below.

Pollock Planning Associates’ Chief Compliance Officer, Steven Pollock, remains available to address any questions that an existing or prospective client may have regarding this Brochure.

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## **Item 4            Advisory Business**

- A. Pollock Planning Associates, Inc. (“Pollock Planning”) is a corporation formed in October 1985 under the law of the State of New Jersey. Pollock Planning became registered as an investment adviser registered with the Securities and Exchange Commission on May 30, 1986. Pollock Planning is solely owned by Steven Leonard Pollock and he is also the firm’s President.
- B. As discussed below, Pollock Planning offers to its clients (primarily high net worth individuals) investment advisory services on a discretionary basis and financial planning services.

### **INVESTMENT MANAGEMENT SERVICES**

Pollock Planning provides discretionary investment management services on a *fee-only* basis. We also offer to provide all clients with financial planning services. Pollock Planning’s services include investment management services, and, to the extent specifically requested by the client, financial planning and consulting services. In the event that the client requires extraordinary planning or consultation services (to be determined in the sole discretion of Pollock Planning), the firm may determine to charge for those additional services, the dollar amount of which will be agreed to between Pollock Planning and the client. Clients and prospective clients should review the disclosure under the heading “Limitations of Financial Planning and Non-Investment Consulting/Implementation Services” for more information about our planning and consulting services.

### **FINANCIAL PLANNING AND CONSULTING SERVICES (STAND-ALONE)**

To the extent specifically requested by a client, Pollock Planning may provide financial planning and/or consulting services (including investment and non-investment related matters, including estate planning, insurance planning, etc.) on a stand-alone separate fee basis per the terms and conditions of a separate written agreement and fee, the fee for which shall generally be based upon the individual providing the service and the scope of the services to be provided.

Prior to engaging Pollock Planning to provide planning or consulting services, clients are generally required to enter into an agreement with the firm, which sets forth the terms and conditions of the engagement, describing the scope of the services to be provided, and the portion of the fee that is due from the client prior to Pollock Planning commencing services. If requested by the client, Pollock Planning may recommend the services of other professionals for implementation purposes (i.e. attorneys, accountants, insurance agents). The client is under no obligation to engage the services of any recommended professional. The client retains absolute discretion over all implementation decisions and is free to accept or reject any recommendation from Pollock Planning. If the client engages any recommended professional, and a dispute arises, the client agrees to seek recourse exclusively from the engaged professional. It remains the client’s responsibility to promptly notify Pollock Planning if there is ever any change in their financial situation or investment objectives so that Pollock Planning can review, and if necessary, revise its previous recommendations.

## MISCELLANEOUS

**Limitations of Financial Planning and Non-Investment Consulting/Implementation Services.** To the extent requested and engaged by a client to do so, Pollock Planning may provide financial planning and related consulting services regarding non-investment related matters, such as estate, tax, retirement, investments and insurance planning per the terms and conditions of the engagement. Pollock Planning will not assist in the implementation of any elements of a financial plan, unless it agrees to do so in writing, and even then its services are typically limited to investing a client's assets. With the exception of a client's investments managed by Pollock Planning, Pollock Planning does not monitor its financial planning recommendations, and clients are responsible for reviewing any financial plan with Pollock Planning.

Pollock Planning does not serve as a law firm, accounting firm, or insurance agency, and no portion of Pollock Planning's services should be construed as legal or accounting services. Accordingly, Pollock Planning does not prepare estate planning documents, tax returns or sell insurance products. To the extent requested by a client, Pollock Planning may recommend the services of other professionals for certain non-investment implementation purposes (i.e. attorneys, accountants, insurance agents). Clients are reminded that they are under no obligation to engage the services of any recommended professional. The client retains absolute discretion over all implementation decisions and is free to accept or reject any recommendation made by Pollock Planning. If the client engages any unaffiliated recommended professional, and a dispute arises, the client agrees to seek recourse exclusively from the engaged professional.

**Retirement Rollovers.** A client or prospective client leaving an employer typically has four options regarding an existing retirement plan (and may engage in a combination of these options): (i) leave the money in the former employer's plan, if permitted, (ii) roll over the assets to the new employer's plan, if one is available and rollovers are permitted, (iii) roll over to an Individual Retirement Account ("IRA"), or (iv) cash out the account value (which could, depending upon the client's age, result in adverse tax consequences). If Pollock Planning recommends that a client roll over their retirement plan assets into an account to be managed by Pollock Planning, such a recommendation creates a conflict of interest if Pollock Planning will earn a new (or increase its current) compensation as a result of the rollover. If Pollock Planning provides a recommendation as to whether a client should engage in a rollover or not, Pollock Planning is acting as a fiduciary within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. No client is under any obligation to roll over retirement plan assets to an account managed by Pollock Planning. Pollock Planning's Chief Compliance Officer, Steven Pollock, remains available to address any questions that a client or prospective client may have regarding the conflict of interest presented by such rollover recommendation.

**Fiduciary Status:** Per the DOL: "When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours." Accordingly, relative to retirement accounts, "we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);

- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.”

**Use of Mutual Funds.** Pollock Planning utilizes mutual funds and exchange traded funds for its client portfolios. In addition to Pollock Planning’s investment advisory fee described below, and transaction and/or custodial fees discussed below, clients will also incur, relative to all mutual fund and exchange traded fund purchases, charges imposed at the fund level (e.g. management fees and other fund expenses). However, if a client or prospective client determines to invest in publicly available mutual funds without engaging Pollock Planning as an investment adviser, the client or prospective client would not receive the benefit of Pollock Planning’s initial and ongoing investment advisory services. Pollock Planning utilizes mutual funds issued by Dimensional Fund Advisors (“DFA”). DFA funds are generally only available through registered investment advisers approved by DFA. Thus, if the client was to terminate Pollock Planning’s services, and transition to another adviser who has not been approved by DFA to utilize DFA funds, restrictions regarding additional purchases of, or reallocation among other DFA funds, will generally apply. In that event, clients determining to liquidate their holdings in DFA mutual funds may be subject to tax consequences.

**Cash Positions.** Pollock Planning continues to treat cash as an asset class. As such, unless determined to the contrary by Pollock Planning, all cash positions (money markets, etc.) shall continue to be included as part of assets under management for purposes of calculating Pollock Planning’s advisory fee. At any specific point in time, depending upon perceived or anticipated market conditions/events (there being **no guarantee** that such anticipated market conditions/events will occur), Pollock Planning may maintain cash positions for defensive purposes. In addition, while assets are maintained in cash, such amounts could miss market advances. Depending upon current yields, at any point in time, Pollock Planning’s advisory fee could exceed the interest paid by the client’s money market fund. **ANY QUESTIONS: Pollock Planning’s Chief Compliance Officer, Steven Pollock, remains available to address**

**ByAllAccounts.** Pollock Planning may provide, via ByAllAccounts and for no additional fee, periodic comprehensive reporting services, which can incorporate all of the client’s investment assets including those investment assets that are not part of the assets managed by Pollock Planning (the “Excluded Assets”). Pollock Planning’s service relative to the Excluded Assets is limited to reporting only and does not include investment implementation. Because Pollock Planning does not have trading authority for the Excluded Assets, the client or their other investment professionals are exclusively responsible for implementing any recommendations relative to the Excluded Assets and the ultimate performance of the Excluded Assets. Without limiting the above, Pollock Planning shall not be responsible for any implementation error (timing, trading, etc.) relative to the Excluded Assets. In the event the client desires that Pollock Planning provide investment management services with respect to the Excluded Assets, the client may engage Pollock Planning to do so pursuant to the terms and conditions of the Investment Advisory Agreement between Pollock Planning and the client.

**Client Obligations.** In performing its services, Pollock Planning will not be required to verify any information received from the client or from the client's other designated professionals and is expressly authorized to rely on that information. Moreover, each client is advised that it remains their responsibility to promptly notify Pollock Planning if there is ever any change in their financial situation or investment objectives so that Pollock Planning can review, and if necessary, revise its previous recommendations.

- C. Pollock Planning provides investment advisory services specific to the needs of each client. Prior to providing investment advisory services, an investment adviser representative will ascertain each client's investment objectives and select an appropriate investment strategy. Pollock Planning then invests the client's assets consistent with the client's designated investment strategy. The client may, at any time, impose reasonable restrictions, in writing, on Pollock Planning's services.
- D. Pollock Planning does not participate in a wrap fee program.
- E. As of December 31, 2021 Pollock, Planning had \$163,155,000 in assets under management on a discretionary basis.

**Item 5 Fees and Compensation**

A.

**INVESTMENT MANAGEMENT SERVICES**

Pollock Planning's annual investment advisory fee can be either a fixed-fee, retainer basis or as a percentage of assets under management. If the client's fee is based on a percentage of assets under management, the schedule is typically as follows:

Annual Fee Schedule:

<u>Market Value of Assets</u>	<u>% of Assets</u>
Initial \$499,999	1.00%
Next \$500,000 to \$999,999	0.75%
Over \$1,000,000	0.50%

While we provide the fee schedule above as an estimate of our asset-based fees, we generally price our advisory services based upon various objective and subjective factors. Pollock Planning in its discretion, may charge a lesser investment advisory fee, charge a flat fee, waive its fee entirely, or charge fee on a different interval, based upon certain criteria (i.e. anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, complexity of the engagement, anticipated services to be rendered, grandfathered fee schedules, employees and family members, courtesy accounts, competition, negotiations with client, etc.). As a result, similarly situated clients could pay diverse fees, and the services to be provided by Pollock Planning to any particular client could be available from other advisers at lower fees. All clients and prospective clients should be guided accordingly.

**FINANCIAL PLANNING AND CONSULTING SERVICES (STAND-ALONE)**

To the extent specifically requested by a client, Pollock Planning *may* determine to provide financial planning and/or consulting services (including investment and non-investment related matters, including estate planning, insurance planning, etc.) on a stand-alone fee basis. Pollock Planning's planning and consulting services are typically offered on a flat fee basis generally ranging between \$4,000 and \$20,000.

- B. Pollock Planning's advisory fees are deducted from the client's custodial account. Both Pollock Planning's Investment Advisory Agreement and the custodial/clearing agreement authorize the custodian to debit the account for the amount of Pollock Planning's investment advisory fee and to directly remit that management fee to Pollock Planning in compliance with regulatory procedures. In the limited event that Pollock Planning bills the client directly, payment is due upon receipt of Pollock Planning's invoice.
- C. As discussed below, unless the client directs otherwise or an individual client's circumstances require, Pollock Planning generally recommends that Charles Schwab & Co. ("Schwab") serve as the broker-dealer/custodian for client accounts. Schwab charges brokerage commissions, transaction, and/or other type fees for effecting certain types of securities transactions (i.e., including transaction fees for certain mutual funds, and mark-ups and mark-downs charged for fixed income transactions, etc.). The types of securities for which transaction fees, commissions, and/or other type fees (as well as the amount of those fees) shall differ depending upon the broker-dealer/custodian (while certain custodians do not currently charge fees on individual equity transactions [including ETFs], others do). In addition to Pollock Planning's investment management fee, brokerage commissions and transaction fees, clients will also incur, relative to all mutual fund and exchange traded fund purchases, charges imposed at the fund level (e.g. management fees and other fund expenses).
- D. Pollock Planning's annual investment advisory fee shall be prorated and paid quarterly, in advance, based upon the market value of the assets on the last business day of the previous quarter. Pollock Planning's policy is to treat intra-quarter account additions and withdrawals equally. Pollock Planning does not charge for intra-quarter additions or withdrawals- unless indicated to the contrary on the *Firm's* Investment Advisory Agreement executed by the client. Pollock Planning generally requires a \$3,000 minimum annual fee for investment advisory services. Pollock Planning, in its sole discretion, may reduce or waive its minimum annual fee requirement.

The *Investment Advisory Agreement* between Pollock Planning and the client will continue in effect until terminated by either party by written notice in accordance with the terms of the *Investment Advisory Agreement*. Upon termination, Pollock Planning shall refund the pro-rated portion of the advanced advisory fee paid based upon the number of days remaining in the billing month.

- E. Neither Pollock Planning, nor its representatives, accepts compensation from the sale of securities or other investment products.

## **Item 6 Performance-Based Fees and Side-by-Side Management**

Neither Pollock Planning nor any supervised person of Pollock Planning is a party to any performance or incentive-related compensation arrangements with its clients.

## Item 7           Types of Clients

Pollock Planning offers to its clients (individuals, trusts, and estates, etc.) investment advisory services on a discretionary basis.

Clients and prospective clients should review Item 5 for information about the firm's minimum annual fee requirements. Pollock Planning in its discretion, may charge a lesser investment advisory fee, charge a flat fee, waive its fee entirely, or charge fee on a different interval, based upon certain criteria (i.e. anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, complexity of the engagement, anticipated services to be rendered, grandfathered fee schedules, employees and family members, courtesy accounts, competition, negotiations with client, etc.). **Please Note:** As result of the above, similarly situated clients could pay different fees. In addition, similar advisory services may be available from other investment advisers for similar or lower fees. **ANY QUESTIONS:** Pollock Planning's Chief Compliance Officer, Steven Pollock, remains available to address any questions that a client or prospective client may have regarding advisory fees.

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

- A. Pollock Planning may utilize the following methods of security analysis:
- Fundamental - (analysis performed on historical and present data, with the goal of making financial forecasts)
  - Technical – (analysis performed on historical and present data, focusing on price and trade volume, to forecast the direction of prices)
  - Cyclical – (analysis performed on historical relationships between price and market trends, to forecast the direction of prices)

Pollock Planning may utilize the following investment strategies when implementing investment advice given to clients:

- Long Term Purchases (securities held at least a year)
- Short Term Purchases (securities sold within a year)

Different types of investments involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy, including the investments and strategies recommended or undertaken by Pollock Planning will be profitable or equal any specific performance levels.

- B. Pollock Planning's methods of analysis and investment strategies do not present any significant or unusual risks.

However, every method of analysis has its own inherent risks. To perform an accurate market analysis Pollock Planning must have access to current/new market information. Pollock Planning has no control over the dissemination rate of market information;

therefore, unbeknownst to Pollock Planning, certain analyses may be compiled with outdated market information, severely limiting the value of Pollock Planning's analysis. Furthermore, an accurate market analysis can only produce a forecast of the direction of market values. There can be no assurances that a forecasted change in market value will materialize into actionable and/or profitable investment opportunities.

Pollock Planning's primary investment strategies - Long Term Purchases and Short Term Purchases - are fundamental investment strategies. However, every investment strategy has its own inherent risks and limitations. For example, longer term investment strategies require a longer investment time period to allow for the strategy to potentially develop. Shorter term investment strategies require a shorter investment time period to potentially develop but, as a result of more frequent trading, may incur higher transactional costs when compared to a longer term investment strategy.

Pollock Planning's strategies involve reviewing client portfolios on a periodic basis to determine if any changes are necessary. Pollock Planning considers various factors, which may include, investment performance, portfolio drift, market changes, tax consequences, and changes in a client's investment objective. Based on these reviews, there may be extended periods of time when Pollock Planning determines that changes to a client's portfolio are not necessary. However, Pollock Planning will continue to earn its fees outlined in Item 5 regardless of the level of trading in a client's account. Clients are responsible for determining whether a relationship with Pollock Planning remains appropriate for them in light of their individual situation.

Pollock Planning's investment strategies may involve above-average portfolio turnover and accounts subject to income taxation could be subject to tax consequences as a result of Pollock Planning's investment strategies. Clients may impose reasonable restrictions on Pollock Planning, in writing, should they wish to avoid or reduce their tax liabilities.

- C. Currently, Pollock Planning primarily allocates client investment assets among various individual equity (stocks) and fixed income securities, mutual funds and/or exchange traded funds on a discretionary basis in accordance with the client's designated investment objectives.

The following provides a short description of some of the underlying risks associated with investing in these types of securities:

Mutual Fund Risk. Mutual funds are operated by investment companies that raise money from shareholders and invests it in stocks, bonds, and/or other types of securities. Each fund will have a manager that trades the fund's investments in accordance with the fund's investment objective. Mutual funds charge a separate management fee for their services, so the returns on mutual funds are reduced by the costs to manage the funds. While mutual funds generally provide diversification, risks can be significantly increased if the fund is concentrated in a particular sector of the market. Mutual funds that are sold through brokers are called load funds, and those sold to investors directly from the fund companies are called no-load funds. Mutual funds come in many varieties. Some invest aggressively for capital appreciation, while others are conservative and are designed to generate income for shareholders. In addition, the client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives).

Exchange Traded Fund Risk. ETFs are marketable securities that are designed to track, before fees and expenses, the performance or returns of a relevant index, commodity, bonds or basket of assets, like an index fund. Unlike mutual funds, ETFs trade like common stock on a stock exchange. ETFs experience price changes throughout the day as they are bought and sold. In addition to the general risks of investing, there are specific risks to consider with respect to an investment in ETFs, including, but not limited to: (i) the price of an ETF may or may not fluctuate with the price of the underlying securities that make up the fund; (ii) the ETF may employ an investment strategy that utilizes high leverage ratios; or (iii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are de-listed from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally.

Pandemic Risk: Large-scale outbreaks of infectious disease can greatly increase morbidity and mortality over a wide geographic area, crossing international boundaries, and causing significant economic, social, and political disruption.

## **Item 9            Disciplinary Information**

Pollock Planning has not been the subject of any disciplinary actions.

## **Item 10          Other Financial Industry Activities and Affiliations**

- A. Neither Pollock Planning, nor its representatives, are registered or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.
- B. Neither Pollock Planning, nor its representatives, are registered or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or a representative of the foregoing.
- C. As a fiduciary, Pollock Planning has certain legal obligations, including the obligation to act in a client's best interest. Pollock Planning maintains a Business Continuity and Succession Plan and seeks to avoid a disruption of service to clients in the event of an unforeseen loss of key personnel, due to disability or death. To that end, Pollock Planning entered into a succession agreement with JFS Wealth Advisors, LLC (CRD: 145051 / SEC: 801-68333) in 2017 which is currently in effect. Pollock Planning can provide additional information to any current or prospective client upon request by contacting Steven Pollock, President at 856-266-2276 or [spollock15@gmail.com](mailto:spollock15@gmail.com).
- D. Pollock Planning does not receive, directly or indirectly, compensation from investment advisors that it recommends or selects for its clients.

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

- A. Pollock Planning maintains an investment policy relative to personal securities transactions. This investment policy is part of Pollock Planning's overall Code of Ethics, which serves to establish a standard of business conduct for all of Pollock Planning's

representatives that is based upon fundamental principles of openness, integrity, honesty and trust, a copy of which is available upon request.

Pollock Planning also maintains and enforces written policies reasonably designed to prevent the misuse of material non-public information by Pollock Planning or any person associated with Pollock Planning.

- B. Neither Pollock Planning nor any related person of Pollock Planning recommends, buys, or sells for client accounts, securities in which Pollock Planning or any related person of Pollock Planning has a material financial interest.
- C. Pollock Planning and/or representatives of Pollock Planning *may* buy or sell securities that are also recommended to clients. This practice may create a situation where Pollock Planning and/or representatives of the firm are in a position to materially benefit from the sale or purchase of those securities. Therefore, this situation creates a potential conflict of interest. Practices such as “scalping” (i.e., a practice whereby the owner of shares of a security recommends that security for investment and then immediately sells it at a profit upon the rise in the market price which follows the recommendation) could take place if Pollock Planning did not have adequate policies in place to detect such activities. In addition, this requirement can help detect insider trading, “front-running” (i.e., personal trades executed prior to those of Pollock Planning’s clients) and other potentially abusive practices.

Pollock Planning has a personal securities transaction policy in place to monitor the personal securities transactions and securities holdings of each of Pollock Planning’s “Access Persons”. Pollock Planning’s securities transaction policy requires that an Access Person of Pollock Planning must provide the Chief Compliance Officer or his/her designee with a written report of their current securities holdings within ten (10) days after becoming an Access Person. Additionally, each Access Person must provide the Chief Compliance Officer or his/her designee with a written report of the Access Person’s current securities holdings at least once each twelve (12) month period thereafter on a date Pollock Planning selects; provided, however that at any time that Pollock Planning has only one Access Person, he or she shall not be required to submit any securities report described above.

- D. Pollock Planning and/or representatives of Pollock Planning *may* buy or sell securities, at or around the same time as those securities are recommended to clients. This practice creates a situation where Pollock Planning and/or representatives of the firm are in a position to materially benefit from the sale or purchase of those securities. Therefore, this situation creates a potential conflict of interest. As indicated above in Item 11.C, Pollock Planning has a personal securities transaction policy in place to monitor the personal securities transaction and securities holdings of each of Pollock Planning’s Access Persons.

## **Item 12      Brokerage Practices**

- A. In the event that the client requests that Pollock Planning recommend a broker-dealer/custodian for execution and/or custodial services (exclusive of those clients that may direct Pollock Planning to use a specific broker-dealer/custodian), Pollock Planning generally recommends that investment management accounts be maintained at Schwab.

Prior to engaging Pollock Planning to provide investment management services, the client will be required to enter into a formal Investment Advisory Agreement with Pollock Planning setting forth the terms and conditions under which Pollock Planning shall manage the client's assets, and a separate custodial/clearing agreement with each designated broker-dealer/custodian.

Factors that Pollock Planning considers in recommending *Schwab* (or any other broker-dealer/custodian to clients) include historical relationship with Pollock Planning, financial strength, reputation, execution capabilities, pricing, research, and service. Broker-dealers such as Schwab can charge transaction fees for effecting certain securities transactions (*See* Item 4 above). To the extent that a transaction fee will be payable by the client to Schwab, the transaction fee shall be in addition to Pollock Planning's investment advisory fee referenced in Item 5 above.

To the extent that a transaction fee is payable, Pollock Planning shall have a duty to obtain best execution for such transaction. However, that does not mean that the client will not pay a transaction fee that is higher than another qualified broker-dealer might charge to effect the same transaction where Pollock Planning determines, in good faith, that the transaction fee is reasonable. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including the value of research provided, execution capability, transaction rates, and responsiveness. Accordingly, although Pollock Planning will seek competitive rates, it may not necessarily obtain the lowest possible rates for client account transactions.

1. Research and Additional Benefits.

Although not a material consideration when determining whether to recommend that a client utilize the services of a particular broker-dealer/custodian, Pollock Planning can receive from Schwab (or another broker-dealer/custodian, investment manager, platform sponsor, mutual fund sponsor, or vendor) without cost (and/or at a discount) support services and/or products, certain of which assist Pollock Planning to better monitor and service client accounts maintained at such institutions. Included within the support services that can be obtained by Pollock Planning can be investment-related research, pricing information and market data, software and other technology that provide access to client account data, compliance and/or practice management-related publications, discounted or gratis consulting services, discounted and/or gratis attendance at conferences, meetings, and other educational and/or social events, marketing support-including client events, computer hardware and/or software and/or other products used by Pollock Planning in furtherance of its investment advisory business operations.

Pollock Planning's clients do not pay more for investment transactions effected or assets maintained at Schwab or other broker-dealers and custodians because of these arrangements. There is no corresponding commitment made by Pollock Planning to Schwab, or any other any entity, to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as result of the above arrangement.

Pollock Planning's Chief Compliance Officer, Steven Pollock, remains available to address any questions that a client or prospective client may have regarding the above arrangement and any the conflicts of interest this arrangement creates.

2. Pollock Planning does not receive referrals from broker-dealers.
3. Pollock Planning does not generally accept directed brokerage arrangements (when a client requires that account transactions be effected through a specific broker-dealer). In such client directed arrangements, the client will negotiate terms and arrangements for their account with that broker-dealer, and Pollock Planning will not seek better execution services or prices from other broker-dealers or be able to "batch" the client's transactions for execution through other broker-dealers with orders for other accounts managed by Pollock Planning. As a result, client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case.

In the event that the client directs Pollock Planning to effect securities transactions for the client's accounts through a specific broker-dealer, the client correspondingly acknowledges that such direction may cause the accounts to incur higher commissions or transaction costs than the accounts would otherwise incur had the client determined to effect account transactions through alternative clearing arrangements that may be available through Pollock Planning. Higher transaction costs adversely impact account performance. Transactions for directed accounts will generally be executed following the execution of portfolio transactions for non-directed accounts.

- B. Transactions for each client account generally will be effected independently unless Pollock Planning decides to purchase or sell the same securities for several clients at approximately the same time. Pollock Planning may (but is not obligated to) combine or "batch" such orders for individual equity transactions (including ETFs) with the intention to obtain better price execution, to negotiate more favorable commission rates, or to allocate more equitably among Pollock Planning's clients differences in prices and commissions or other transaction costs that might have occurred had such orders been placed independently. Under this procedure, transactions will be averaged as to price and will be allocated among clients in proportion to the purchase and sale orders placed for each client account on any given day. In the event that Pollock Planning becomes aware that a firm employee seeks to trade in the same security on the same day, the employee transaction will either be included in the "batch" transaction or transacted after all discretionary client transactions have been completed. Pollock Planning will not receive any additional compensation as a result of its order aggregation.

## **Item 13      Review of Accounts**

- A. For those clients to whom Pollock Planning provides investment supervisory services, account reviews are conducted on a periodic basis by Pollock Planning's Principal. All investment supervisory clients are advised that it remains their responsibility to advise Pollock Planning of any changes in their investment objectives and financial situation. All clients (in person or via telephone) are encouraged to review financial planning issues

(to the extent applicable), investment objectives and account performance with Pollock Planning on an annual basis.

- B. Pollock Planning may conduct account reviews on an other than periodic basis upon the occurrence of a triggering event, such as a change in client investment objectives and/or financial situation, market corrections and client request.
- C. Clients are provided, at least quarterly, with written transaction confirmation notices and regular written summary account statements directly from the broker-dealer/custodian and/or program sponsor for the client accounts. Pollock Planning may also provide a written periodic report summarizing account activity and performance.

#### **Item 14      Client Referrals and Other Compensation**

- A. As referenced in Item 12.A.1 above, Pollock Planning may receive an indirect economic benefit from Schwab. Pollock Planning may receive free or discounted support services or products from Schwab. Pollock Planning's clients do not pay more for investment transactions effected and/or assets maintained at Schwab (or any other institution) as result of this arrangement. There is no corresponding commitment made by Pollock Planning to Schwab, or to any other entity, to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as the result of the above arrangement
- B. Pollock Planning does not have any new referral relationships where it compensates others for client referrals.

#### **Item 15      Custody**

Pollock Planning shall have the ability to have its advisory fee for each client debited by the custodian on a quarterly basis. Clients are provided, at least quarterly, with written transaction confirmation notices and regular written summary account statements directly from the broker-dealer/custodian and/or program sponsor for the client accounts. Pollock Planning may also provide a written periodic report summarizing account activity and performance.

To the extent that Pollock Planning provides clients with periodic account statements or reports, the client is urged to compare any statement or report provided by Pollock Planning with the account statements received from the account custodian. The account custodian does not verify the accuracy of Pollock Planning's advisory fee calculation.

In addition, certain clients have established asset transfer authorizations that permit the qualified custodian to rely upon instructions from Pollock Planning to transfer client funds or securities to third parties. These arrangements are disclosed at Item 9 of Part 1 of Form ADV. However, in accordance with the guidance provided in the SEC's February 21, 2017 *Investment Adviser Association* No-Action Letter, the affected accounts are not subject to an annual surprise CPA examination.

## **Item 16 Investment Discretion**

The client can engage Pollock Planning to provide investment advisory services on a discretionary basis. Prior to Pollock Planning assuming discretionary authority over a client's account, client shall be required to execute an Investment Advisory Agreement, naming Pollock Planning as client's attorney and agent in fact, granting Pollock Planning full authority to buy, sell, or otherwise effect investment transactions involving the assets in the client's name found in the discretionary account.

Clients who engage Pollock Planning on a discretionary basis may, at any time, impose restrictions, in writing, on Pollock Planning's discretionary authority (e.g., limit the types/amounts of particular securities purchased for their account, exclude the ability to purchase securities with an inverse relationship to the market).

## **Item 17 Voting Client Securities**

- A. Pollock Planning does not vote client proxies. Clients maintain exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the client's investment assets.
- B. Clients will receive their proxies or other solicitations directly from their custodian. Clients may contact Pollock Planning to discuss any questions they may have with a particular solicitation.

## **Item 18 Financial Information**

- A. Pollock Planning does not solicit fees of more than \$1,200 per client, six months or more in advance.
- B. Pollock Planning is unaware of any financial condition that is reasonably likely to impair its ability to meet its contractual commitments relating to its discretionary authority over certain client accounts.
- C. Pollock Planning has not been the subject of a bankruptcy petition.

ANY QUESTIONS: Pollock Planning's Chief Compliance Officer, Steven Pollock, remains available to address any questions that a client or prospective client may have regarding the above disclosures and arrangements.