

Pollock Planning Associates, Inc.

ADV Part 2A, Firm Brochure Dated: February 21, 2015

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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) 854-3319 or spollock15@comcast.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 Pollock Planning Associates, Inc. is also available on the SEC's website at 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 have been no material changes made to Pollock Planning Associates' disclosure statement since its last Annual Amendment filing made on January 9, 2014.

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Item 4 Advisory Business

- A. Pollock Planning Associates, Inc. (“Pollock Planning”) is a corporation formed in October 1985 in the State of New Jersey. Pollock Planning became registered as an Investment Adviser Firm 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 (individuals, trusts, estates and charitable organizations, etc.) 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. The firm’s annual investment management fee shall be based upon a percentage (%) of the market value and type of assets placed under Pollock Planning’s management between 0.35% and 0.75%.

Pollock Planning’s annual investment advisory fee shall 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 and/or consultation services (to be determined in the sole discretion of Pollock Planning), the firm may determine to charge for such additional services, the dollar amount of which shall be set forth in a separate written notice to the client

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.

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 (including termination), 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, etc.). The client is under no obligation to engage the services of any such recommended professional. **Please Note:** If the client engages any such recommended professional, and a dispute arises thereafter relative to such engagement, the client agrees to seek recourse exclusively from and against the engaged professional. **Please Also Note:** It remains the client’s responsibility to promptly notify the Registrant if there is ever any change in his/her/its financial situation or investment objectives for the purpose of reviewing/evaluating/revising Registrant’s previous recommendations and/or services.

The client retains absolute discretion over all such implementation decisions and is free to accept or reject any recommendation from Pollock Planning.

MISCELLANEOUS

Non-Investment Consulting/Implementation Services. To the extent requested by the client, Pollock Planning *may* provide consulting services regarding non-investment related matters, such as estate planning, tax planning, insurance, etc. Neither Pollock Planning, nor any of its representatives, serves as an attorney, accountant, or licensed insurance agent, and no portion of Pollock Planning's services should be construed as same. 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, etc.). The client is under no obligation to engage the services of any such recommended professional. The client retains absolute discretion over all such implementation decisions and is free to accept or reject any recommendation from Pollock Planning. **Please Note:** If the client engages any such recommended professional, and a dispute arises thereafter relative to such engagement, the client agrees to seek recourse exclusively from and against the engaged professional. **Please Also Note:** It remains the client's responsibility to promptly notify Pollock Planning if there is ever any change in his/her/its financial situation or investment objectives for the purpose of reviewing/evaluating/revising Pollock Planning's previous recommendations and/or services.

Retirement Plan Rollovers-No Obligation/Conflict of Interest: Clients are under absolutely no obligation to engage Pollock Planning as the investment adviser for his/her employer-sponsored retirement account(s). Rather, clients can continue to self-direct such retirement account(s). However, if a client determines that he/she would like Pollock Planning's assistance in managing his/her retirement account, Pollock Planning shall charge an advisory fee for ongoing advisory services, which clients would not incur by continuing to self-direct the retirement account. As a result, any recommendation by Pollock Planning that clients engage Pollock Planning to manage an otherwise self-directed retirement account presents a conflict of interest. Clients are under absolutely no obligation to engage Pollock Planning as the investment adviser for his/her retirement account.

Use of Mutual Funds: Most mutual funds are available directly to the public. Thus, a client or prospective client can obtain many of the mutual funds that may be recommended and/or utilized by Pollock Planning independent of engaging Pollock Planning as an investment advisor. However, if a client or prospective client determines to do so, he/she/it will not receive Pollock Planning's initial and ongoing investment advisory services

Client Obligations. In performing its services, Pollock Planning shall not be required to verify any information received from the client or from the client's other professionals, and is expressly authorized to rely thereon. Moreover, each client is advised that it remains his/her/its responsibility to promptly notify Pollock Planning if there is ever any change in his/her/its financial situation or investment objectives for the purpose of reviewing/evaluating/revising Pollock Planning's previous recommendations and/or services.

Disclosure Statement. A copy of Pollock Planning's written Brochure as set forth on Part 2A of Form ADV shall be provided to each client prior to, or contemporaneously with, the execution of the *Investment Advisory Agreement* and/or *Financial Planning Agreement*.

- C. Pollock Planning shall provide 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 objective(s). Thereafter, Pollock Planning shall allocate and/or recommend that the client allocate investment assets consistent with the designated investment objective(s). The client may, at anytime, 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, 2014 Pollock Planning had \$135,577,000 in assets under management on a discretionary basis.

Item 5 Fees and Compensation

A.

INVESTMENT MANAGEMENT SERVICES

The client can determine to engage Pollock Planning to provide discretionary investment advisory services on a *fee-only* basis. Pollock Planning's annual investment advisory fee shall be based upon a percentage (%) of the market value and type of assets placed under Pollock Planning's management (between 0.35% and 0.75%) as follows:

Annual Fee Schedule:

<u>Market Value of Assets</u>	<u>% of Assets</u>
Up to \$499,999	0.75%
\$500,000 to \$999,999	0.50%
\$1,000,000 to \$1,999,999	0.40%
Over \$2,000,000	0.35%

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 provided at \$200 per hour.

- 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. Pollock Planning shall generally deduct fees and/or bill clients quarterly in advance based upon the market value of the assets on the last business day of the previous quarter.
- C. As discussed below, unless the client directs otherwise or an individual client's circumstances require, Pollock Planning shall generally recommend that Charles Schwab & Co. ("*Schwab*") serve as the broker-dealer/custodian for client investment management

assets. Broker-dealers such as *Schwab* charge brokerage commissions and/or transaction fees for effecting certain securities transactions (i.e. transaction fees are charged for certain no-load mutual funds, commissions are charged for individual equity and fixed income securities transactions). In addition to Pollock Planning's investment management fee, brokerage commissions and/or 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 month. Pollock Planning generally requires a \$2,500 minimum annual fee for investment advisory services. Pollock Planning, in its sole discretion, may charge a lesser investment management fee and/or reduce its minimum annual fee requirement 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, negotiations with client, etc.).

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 accepts performance-based fees.

Item 7 Types of Clients

Pollock Planning offers to its clients (individuals, trusts, estates and charitable organizations, etc.) investment advisory services on a discretionary basis. Pollock Planning generally requires a minimum annual fee of \$2,500. Pollock Planning, in its sole discretion, may charge a lesser investment management fee and/or reduce its minimum annual fee based upon certain criteria (e.g., anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, negotiations with client, etc.).

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)

Please Note: Investment Risk 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/or investment strategies recommended or undertaken by Pollock Planning) will be profitable or equal any specific performance level(s).

- 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.

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

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. Pollock Planning has no other relationship or arrangement with a related person that is material to its advisory business.
- D. Pollock Planning does not recommend or select other investment advisors 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. Although the commissions and/or transaction fees paid by Pollock Planning's clients shall comply with Pollock Planning's duty to obtain best execution, a client may pay a commission that is higher than another qualified broker-dealer might charge to effect the same transaction where Pollock Planning determines, in good faith, that the commission/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, commission rates, and responsiveness. Accordingly, although Pollock Planning will seek competitive rates, it may not necessarily obtain the lowest possible commission rates for client account transactions. The brokerage commissions or transaction fees charged by the designated broker-dealer/custodian are exclusive of, and in addition to, Pollock Planning's investment management fee. Pollock Planning's best execution responsibility is qualified if securities that it purchases for client accounts are mutual funds that trade at net asset value as determined at the daily market close.

- 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 may receive from *Schwab* (or another broker-dealer/custodian, investment platform and/or mutual fund sponsor), 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 may be obtained by Pollock Planning may 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, computer hardware and/or software and/or other products used by Pollock Planning in furtherance of its investment advisory business operations.

As indicated above, certain of the support services and/or products that *may* be received may assist Pollock Planning in managing and administering client accounts. Others do not directly provide such assistance, but rather assist Pollock Planning to manage and further develop its business enterprise.

Pollock Planning's clients do not pay more for investment transactions effected and/or assets maintained at *Schwab* as a result of this arrangement. There is no corresponding commitment made by Pollock Planning to *Schwab* or any other entity to invest any specific amount of percentage of client assets in any specific mutual funds, or securities or other investment products as a 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 corresponding perceived conflict of interest any such arrangement may create.

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.

Please Note: 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.

- B. To the extent that Pollock Planning provides investment management services to its clients, the 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 “bunch” such orders to obtain best execution, to negotiate more favorable commission rates or to allocate equitably among Pollock Planning’s clients differences in prices and commissions or other transaction costs that might have been obtained 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. Pollock Planning shall not receive any additional compensation or remuneration as a result of such aggregation.

Item 13 Review of Accounts

- A. For those clients to whom Pollock Planning provides investment supervisory services, account reviews are conducted on an ongoing 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/or 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, without cost (and/or at a discount), may receive support services and/or products from *Schwab*.

Pollock Planning’s clients do not pay more for investment transactions effected and/or assets maintained at *Schwab* as result of this arrangement. There is no corresponding commitment made by Pollock Planning to *Schwab* or any other entity to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as a 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 corresponding perceived conflict of interest any such arrangement may create.

- B. Pollock Planning does not have any new referral relationships whereby 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.

Please Note: 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.

Please Also Note: The account custodian does not verify the accuracy of Pollock Planning's advisory fee calculation.

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 anytime, impose restrictions, **in writing**, on Pollock Planning's discretionary authority (i.e. limit the types/amounts of particular securities purchased for their account, exclude the ability to purchase securities with an inverse relationship to the market, limit or proscribe Pollock Planning's use of margin, etc.).

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.