

Pollock Planning Associates, Inc.

ADV Part 2A, Firm Brochure Dated: March 1, 2024

Contact: Steven Pollock, Chief Compliance Officer
61 Villa Nova Drive
Asheville, NC 28804
www.pollockplanning.com

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. 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 this Brochure since Pollock Planning Associates' last Annual Amendment filing made on February 7, 2022.

Pollock Planning has made disclosure changes, enhancements and additions at Item 4 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.

Item 3 Table of Contents

Item 1	Cover Page.....	1
Item 2	Material Changes.....	2
Item 3	Table of Contents.....	2
Item 4	Advisory Business	3
Item 5	Fees and Compensation	9
Item 6	Performance-Based Fees and Side-by-Side Management	10
Item 7	Types of Clients.....	11
Item 8	Methods of Analysis, Investment Strategies and Risk of Loss.....	11
Item 9	Disciplinary Information	13
Item 10	Other Financial Industry Activities and Affiliations	13
Item 11	Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.....	13
Item 12	Brokerage Practices	14
Item 13	Review of Accounts.....	16
Item 14	Client Referrals and Other Compensation	17
Item 15	Custody.....	17
Item 16	Investment Discretion.....	17
Item 17	Voting Client Securities.....	18
Item 18	Financial Information	18

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 as discussed at Item 5 below. 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. To commence the investment advisory process, Pollock Planning will ascertain each client’s investment objective(s) and then allocate the client’s assets consistent with the client’s designated investment objective(s). Once allocated, Pollock Planning provides ongoing supervision of the account(s).

FINANCIAL PLANNING AND CONSULTING SERVICES (STAND-ALONE)

Pollock Planning may also provide financial planning and related consulting services regarding matters such as tax and estate planning, insurance, etc. on a stand-alone 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 a *Financial Planning and Consulting Agreement* with Pollock Planning setting 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 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.

Use of Mutual Funds and Exchange Traded 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).

Please Note-Use of DFA Mutual Funds: Pollock Planning utilizes the 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. **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.

Custodian Charges-Additional Fees. As discussed below at Item 12 below, when requested to recommend a broker-dealer/custodian for client accounts, Pollock Planning generally recommends that *Schwab* serve as the broker-dealer/custodian for client investment management assets. Broker-dealers such as *Schwab* charge 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, including *Schwab*, generally (with the potential exception for large orders) do not currently charge fees on individual equity transactions (including ETFs), others do. **Please Note:** there can be no assurance that *Schwab* will not change their transaction fee pricing in the future. The above fees/charges are in addition to Pollock Planning's investment advisory fee at Item 5 below. Pollock Planning does not receive any portion of these fees/charges. **ANY QUESTIONS:** Registrant's Chief Compliance Officer, Steven Pollock, remains available to address any questions that a client or prospective client may have regarding the above.

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 any questions that a client or prospective client may have regarding the above fee billing practice.

Cash Sweep Accounts. Account custodians generally require that cash proceeds from account transactions or cash deposits be swept into and/or initially maintained in the custodian's sweep account. The yield on the sweep account is generally lower than those available in money market accounts. To help mitigate this issue, Pollock Planning shall generally purchase a higher yielding money market fund available on the custodian's platform with cash proceeds or deposits, unless Pollock Planning reasonably anticipates that it will utilize the cash proceeds during the subsequent 30-day period to purchase additional investments for the client's account. Exceptions and/or modifications can and will occur with respect to all or a portion of the cash balances for various reasons, including, but not limited to, the amount of dispersion between the sweep account and a money market fund, an indication from the client of an imminent need for such cash, or the client has a demonstrated history of writing checks from the account. **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.

Other Assets. A client may:

- hold securities that were purchased at the request of the client or acquired prior to the client's engagement of Pollock Planning. Generally, with potential exceptions, Pollock Planning does not/would not recommend nor follow such securities, and absent mitigating tax consequences or client direction to the contrary, would prefer to liquidate such securities. Please Note: If/when liquidated, it should not be assumed that the replacement securities purchased by Pollock Planning will outperform the liquidated positions. To the contrary, different types of investments involve varying degrees of risk, and there can be no assurance 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). In addition, there may be other securities and/or accounts owned by the client for which Pollock Planning does not maintain custodian access and/or trading authority; and,
- hold other securities and/or own accounts for which Pollock Planning does not maintain custodian access and/or trading authority.

Corresponding Services/Fees: When agreed to by Pollock Planning, Pollock Planning shall: (1) remain available to discuss these securities/accounts on an ongoing basis at the request of the client; (2) monitor these securities/accounts on a regular basis, including, where applicable, rebalancing with client consent; (3) shall generally consider these securities as part of the client's overall asset allocation; and, (4) report on such securities/accounts as part of regular reports that may be provided by Pollock Planning; and, (5) include the market value of all such securities for purposes of calculating advisory fee.

ESG: We don't have or recommend a strategy:

Please Note: Socially Responsible (ESG) Investing Limitations. *Socially Responsible Investing* involves the incorporation of Environmental, Social and Governance ("ESG") considerations into the investment due diligence process. ESG investing incorporates a set of criteria/factors used in evaluating potential investments: Environmental (i.e., considers how a company safeguards the environment); Social (i.e., the manner in which a company manages relationships with its employees, customers, and the communities in which it operates); and Governance (i.e., company management considerations). The number of companies that meet an acceptable ESG mandate can be limited when compared to those that do not, and could underperform broad market indices. Investors must accept these limitations, including potential for underperformance. As with any type of investment (including any investment and/or investment strategies recommended and/or undertaken by Pollock Planning), there can be no assurance that investment in ESG securities or funds will be profitable, or prove successful. Pollock Planning does not maintain or advocate an ESG investment strategy, but will seek to employ ESG if directed by a client to do so. If implemented, Pollock Planning shall rely upon the assessments undertaken by the unaffiliated mutual fund, exchange traded fund or separate account manager to determine that the fund's or portfolio's underlying company securities meet a socially responsible mandate.

WE DON'T RECOMMEND Cryptocurrency: For clients who want exposure to cryptocurrencies, including Bitcoin, Pollock Planning, will advise the client to consider a potential investment in corresponding exchange traded securities, or an allocation to separate account managers and/or private funds that provide cryptocurrency exposure. Crypto is a digital currency that can be used to buy goods and services, but uses an online ledger with strong cryptography (i.e., a method of protecting information and communications through the use of codes) to secure online transactions. Unlike conventional currencies issued by a monetary authority, cryptocurrencies are generally not

controlled or regulated and their price is determined by the supply and demand of their market. Because cryptocurrency is currently considered to be a speculative investment, the Registrant will not exercise discretionary authority to purchase a cryptocurrency investment for client accounts. Rather, a client must expressly authorize the purchase of the cryptocurrency investment. **Please Note:** Pollock Planning does not recommend or advocate the purchase of, or investment in, cryptocurrencies. Pollock Planning considers such an investment to be speculative. **Please Also Note:** Clients who authorize the purchase of a cryptocurrency investment must be prepared for the potential for liquidity constraints, extreme price volatility and complete loss of principal.

Portfolio Activity. Pollock Planning has a fiduciary duty to provide services consistent with the client's best interest. Registrant will review client portfolios on an ongoing basis to determine if any changes are necessary based upon various factors, including, but not limited to, investment performance, market conditions, fund manager tenure, style drift, account additions/withdrawals, and/or a change in the client's investment objective. Based upon these factors, there may be extended periods of time when Pollock Planning determines that changes to a client's portfolio are unnecessary. Clients remain subject to the fees described in Item 5 below during periods of portfolio inactivity. Of course, as indicated below, there can be no assurance that investment decisions made by the Pollock Planning will be profitable or equal any specific performance level(s).

Borrowing Against Assets/Risks. A client who has a need to borrow money could determine to do so by using:

- **Margin**-The account custodian or broker-dealer lends money to the client. The custodian charges the client interest for the right to borrow money and uses the assets in the client's brokerage account as collateral.

These above-described collateralized loans are generally utilized because they typically provide more favorable interest rates than standard commercial loans. These types of collateralized loans can assist with a pending home purchase, permit the retirement of more expensive debt, or enable borrowing in lieu of liquidating existing account positions and incurring capital gains taxes. However, such loans are not without potential material risk to the client's investment assets. The lender (i.e. custodian, bank, etc.) will have recourse against the client's investment assets in the event of loan default or if the assets fall below a certain level. For this reason, Pollock Planning does not recommend such borrowing unless it is for specific short-term purposes (i.e. to purchase a new residence). Pollock Planning does not recommend such borrowing for investment purposes (i.e. to invest borrowed funds in the market). Regardless, if the client was to determine to utilize margin, the following economic benefits would inure to Pollock Planning:

- by taking the loan rather than liquidating assets in the client's account, Pollock Planning continues to earn a fee on such Account assets; and,
- if the client invests any portion of the loan proceeds in an account to be managed by Pollock Planning, Pollock Planning will receive an advisory fee on the invested amount.

Please Note: The Client must accept the above risks and potential corresponding consequences associated with the use of margin.

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"). Unless agreed to otherwise, **the client and/or his/her/its other advisors that maintain trading authority, and not Pollock Planning, shall be exclusively responsible for the investment performance of the Excluded Assets.** Unless also agreed to otherwise, Pollock Planning does not provide investment management, monitoring or implementation services for the Excluded Assets. If the Pollock Planning is asked to make a recommendation as to any Excluded Assets, the client is under absolutely no obligation to accept the recommendation, and Pollock Planning shall not be responsible for any implementation error (timing, trading, etc.) relative to the Excluded Assets. The client can engage Pollock Planning to provide investment management services for the Excluded Assets pursuant to the terms and conditions of the *Investment Advisory Agreement* between Pollock Planning and the client.

Cybersecurity Risk. The information technology systems and networks that Pollock Planning and its third-party service providers use to provide services to Pollock Planning's clients employ various controls, which are designed to prevent cybersecurity incidents stemming from intentional or unintentional actions that could cause significant interruptions in Pollock Planning's operations and result in the unauthorized acquisition or use of clients' confidential or non-public personal information. Clients and Pollock Planning are nonetheless subject to the risk of cybersecurity incidents that could ultimately cause them to incur losses, including for example: financial losses, cost and reputational damage to respond to regulatory obligations, other costs associated with corrective measures, and loss from damage or interruption to systems. Although Pollock Planning has established its systems to reduce the risk of cybersecurity incidents from coming to fruition, there is no guarantee that these efforts will always be successful, especially considering that Pollock Planning does not directly control the cybersecurity measures and policies employed by third-party service providers. Clients could incur similar adverse consequences resulting from cybersecurity incidents that more directly affect issuers of securities in which those clients invest, broker-dealers, qualified custodians, governmental and other regulatory authorities, exchange and other financial market operators, or other financial institutions.

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 for the purpose of reviewing/evaluating/revising our previous recommendations and/or services.

- 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, 2023 Pollock, Planning had \$153,129,998 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. **ANY QUESTIONS:** Pollock Planning's Chief Compliance Officer, Steven Pollock, remains available to address any questions regarding advisory fees.

Margin Accounts: Risks. Pollock Planning **does not** recommend the use of margin for investment purposes. A *margin account* is a brokerage *account* that allows investors to borrow money to buy securities and/or for other non-investment borrowing purposes. The broker/custodian charges the investor interest for the right to borrow money and uses the securities as collateral. By using borrowed funds, the customer is employing leverage that will magnify both account gains and losses. **Please Note:** The use of margin can cause significant adverse financial consequences in the event of a market correction. **ANY QUESTIONS:** Our Chief Compliance Officer, Steven Pollock, remains available to address any questions that a client or prospective client may have regarding the use of margin.

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 Pollock Planning'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. In the event that the client is subject to an annual minimum fee, the client could pay a higher percentage fee than referenced above.

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 quarter.

- 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 it 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.
- 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 recommends that its clients utilize the brokerage and custodial services provided by Schwab. The Firm generally does not accept directed brokerage arrangements (but could make exceptions). A directed brokerage arrangement arises when a client requires that account transactions be effected

through a specific broker-dealer/custodian, other than one generally recommended by Pollock Planning (i.e., Schwab). 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 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..

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.