

**ITEM 1: COVER PAGE**

**Pecunia Services Inc.  
DBA: Pecunia  
Form ADV Part 2A**

November 13, 2020

757 N. Orleans Street  
Unit 1805  
Chicago, IL 60654

This brochure provides information regarding the qualification and business practices of Pecunia, Services Inc. (“Pecunia”), an investment advisor registered with the United States Securities and Exchange Commission (the “SEC”). Registration does not imply a certain level of skill or training but only indicates that Pecunia has registered its business with the SEC. The information in this brochure has not been approved or verified by the SEC or by any state securities authority.

If you have questions regarding the contents of this brochure, please contact Pecunia at 312.810.6169 or [info@pecunia.com](mailto:info@pecunia.com). Additional information about Pecunia is also available on the SEC’s website, [www.advisorinfo.sec.gov](http://www.advisorinfo.sec.gov).

## **ITEM 2: MATERIAL CHANGES**

None.

### **ITEM 3: TABLE OF CONTENTS**

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

## ITEM 4: ADVISORY BUSINESS

### A. Firm Description

Pecunia Services Inc. (Pecunia) is a Delaware corporation formed on September 30, 2020. Pecunia is entirely owned by Jonathan Woznak. For additional information please direct any questions to [info@pecuniaplan.com](mailto:info@pecuniaplan.com).

### B. Types of Advisory Services

Pecunia (“we”, “us”, “our”) is a provider of workplace retirement plans. In this capacity Pecunia provides administrative, recordkeeping, and investment management services to employer-sponsored retirement plans (“clients”, “prospective clients”, “participants”, “members”).

Pecunia is an entirely online investment platform which provides clients guidance in making long-term investment decisions using software models through our website, [pecuniaplan.com](http://pecuniaplan.com). After plan participants complete a questionnaire assessing factors including but not limited to age, investing time horizon, and risk tolerance, Pecunia provides investment portfolio recommendations through our website using proprietary software. Investment advice recommendations are made in the best interest of participants based on obtained information. Pecunia selects a Qualified Default Investment Alternative (“QDIA”) (as defined in the U.S. Department of Labor regulations related to ERISA) for participants who fail to elect an investment selection.

### C. Client-Tailored Services and Restrictions

Pecunia is a fiduciary always acting in the best interest of clients, sponsors, employers, and participants. Clients are not obligated to act upon recommendation from Pecunia or its associates for nondiscretionary advisory services. A core selection of exchange traded funds and mutual funds is included in plan menus for Pecunia clients.

### D. Wrap Fee Programs

Pecunia does not participate in a wrap fee program.

## ITEM 5: FEES AND COMPENSATION

### A. Fees

Pecunia’s fees for investment advisory and plan administration, management, and any other related services are based upon a percentage of assets under management, determined on the last business day of the billing cycle. Fees are debited monthly or quarterly.

An asset-based fee not to exceed .7% is charged annually. Certain client situations may have unique fee arrangements negotiated at the discretion of Pecunia not detailed here.

ADDITIONAL FEES	
Type of Service	Fee
Onsight Fee	\$1000 (may be waived)
Extraordinary Services Fee	\$350/hour
ACH Reversal Fee	\$50

Plan Termination Fee	\$200
Distribution or Refund	\$50
Qualified Domestic Relations Order (QDRO)	\$300
Stop Payment Fee	\$50

The onsite fee, extraordinary services, ACH reversal, and service wind-down fees are applicable to employers. Distribution/refund, qualified domestic relations order (QDRO) and stop payment fees are applicable to plan participants.

Pecunia provides a detailed fee schedule to plan participants in a fee disclosure statement annually and upon inception.

#### B. Billing & Payment

Pecunia's fees are debited monthly or quarterly from accounts in accordance with the arrangement elected upon inception.

#### C. Third-Party Fees

Pecunia does not charge plan sponsors or plan participants third-party fees. Pecunia's platform requires clients and participants use our custodian. Custodian fees are paid by Pecunia as part of our inclusive management fee.

Plan participants are responsible for the payment of third-party exchange traded fees and mutual fund fees. These fees are separate from Pecunia's fees and are charged directly to the participants' account by the fund management company.

#### D. Prepayment of Fees

Pecunia does not accept prepayment of fees.

#### E. Compensation for the Sale of Securities to Clients

Pecunia does not accept compensation for the sale of securities or other investment products.

### **ITEM 6. PERFORMANCE-BASED FEES**

Pecunia and its employees do not charge fees based on capital appreciation of assets in plans.

### **ITEM 7. TYPES OF CLIENTS**

Pecunia's clients consist of employers who provide employer-sponsored retirement plans to their employees. There is no minimum to invest. Employers and participants (employees) enter into advisory agreements with respect to assets held in accounts.

### **ITEM 8: METHODS OF ANALYSIS, INVESTMENT STRATEGIES, AND RISK OF LOSS**

#### A. Methods of Analysis

Pecunia utilizes Modern Portfolio Theory ("MPT") statistics in our evaluation of investments, including but not limited to R-squared, Sharpe ratio, standard deviation, style-based analysis, upside capture ratio, and downside capture ratio among others. Third party managers' performance is among additional factors considered.

## B. Investment Strategies

Pecunia uses investment strategies to provide participants the ability to realize long term capital appreciation on the premise they are held for a year or longer. Participants are provided access to a diverse array of portfolios, including low cost index (passive) and actively managed funds. While various risks (including but not limited to purchasing power (inflation), market, economic, interest rate, and geopolitical) are inherent to a long-term investing strategy, they can be mitigated by techniques including diversified investment selection and dollar cost averaging. Fund expense ratios lower investment returns and are taken into consideration in investment selection.

## C. Risk of Loss

Investing involves risk and loss of principal is possible. Past performance does not guarantee future results. Pecunia exudes care and prudence in investment selection due diligence when constructing a fund lineup. We are unable to guarantee all investments made will be profitable. Inevitably, investments will lose value. Investing in any pooled investment vehicles including mutual funds and exchange traded funds involves risk and loss of principal is possible.

Long term investing offers long term capital appreciation, but simultaneously different risks are inherent at various points in time.

## **ITEM 9: DISCIPLINARY INFORMATION**

### A. Criminal or Civil Actions

Pecunia has no criminal or civil actions to disclose.

### B. Administrative Proceedings

Pecunia has no administrative proceedings to disclose.

### C. Self-regulatory Organization (SRO) Proceedings

Pecunia has no self-regulatory organization proceedings to disclose.

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

### A. Broker-Dealer or Broker-Dealer Representative Registration

Pecunia and our employees are not registered as, and do not have pending applications to register as a broker-dealer or representative of a broker dealer.

### B. Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor Registration

Pecunia and our employees are not registered as any of the above entities.

### C. Material Relationships and Possible Conflicts of Interest

Pecunia and its employees do not have any conflicts of interest to disclose.

D. Material Conflicts of Interest From Other Investment Advisors or Managers. Pecunia and its employees do not have any material conflicts of interest. Should any conflicts arise Pecunia will promptly disclose them in the event they be able to impair our ability to provide objective investment advice.

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

### **A. Code of Ethics**

Pecunia has adopted a Code of Ethics governing employees on topics including insider trading, personal securities transactions, client privacy, and conflicts of interest. A copy is available upon request

We periodically review and amend our Code of Ethics so the policies and procedures remain current. Additionally, we require firm personnel to annual recertify to our Code of Ethics provisions.

## **ITEM 12: BROKERAGE PRACTICES**

### **A. Selection of Custodians and/or Broker-Dealers**

Pecunia requires clients and plan participants use Pecunia's designated custodian.

Pecunia does not maintain relationships with any broker-dealers. If Pecunia were to, we are committed to negotiating competitive fees for our clients. Pecunia does not have a soft dollar program, receive referral from broker-dealers in exchange for the organization's services, or allow clients to execute transactions through a broker-dealer on our platform.

### **B. Block Trading for Multiple Client Accounts**

Pecunia possesses the ability to block trade purchases across accounts. We do not feel clients are at a disadvantage as mutual funds purchased on the same day have the same NAV.

## **ITEM 13: REVIEW OF ACCOUNTS**

Pecunia reviews portfolios on a continuous and ongoing basis to ensure consistency is maintained with defined portfolio goals, risks, and objectives.

Pecunia provides plan participants with a quarterly report detailing the participant's account. The document includes assets held, their value, and any other material information. Additionally, participants have the ability to view their account balance and transactions through our online platform, updated daily several hours following the close of the New York Stock Exchange to accommodate trade settlements.

## **ITEM 14: CLIENT REFERRALS AND OTHER COMPENSATION**

### **A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients**

Pecunia does not receive any financial or economic benefits for any third-party advice provided to Pecunia's clients.

### **B. Compensation to Non-Advisory Personnel for Client Referrals**

Pecunia may engage in compensation arrangements with third parties to solicit our services. Pecunia integrates our services with professional employer organizations, payroll providers, and other workplace benefit and service providers. Compensation arrangements with third parties will be fully disclosed to clients to the extent required by law. All referral arrangements made are in accordance with the Advisors Act Rule 206(4)-3.

#### **ITEM 15: CUSTODY**

Pecunia does not maintain custody of client assets at any time. Client assets are held by Pecunia's designated custodian.

#### **ITEM 16: INVESTMENT DISCRETION**

Pecunia has discretionary authority with regard to selecting funds invested in our managed portfolios.

#### **ITEM 17: VOTING CLIENT SECURITIES**

Pecunia's firm policy is to not proxy vote on behalf of clients. Clients periodically receive proxies sent from the custodian. Clients should direct all proxy questions to the respective fund manager.

#### **ITEM 18: FINANCIAL INFORMATION**

##### **A. Balance Sheet**

Pecunia is not required to include a balance sheet with this document for the most recent fiscal year.

##### **B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients**

Pecunia does not have any financial issues that could impair our fiduciary responsibility to our clients.

##### **C. Bankruptcy Petitions**

Pecunia has never been the subject of a bankruptcy petition.