

# Pillar Financial Advisors, LLC

3046 Breckenridge Lane, Ste. 104  
Louisville, KY 40220  
502-384-3890



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**Brochure**  
**Form ADV Part 2A**  
***Item 1 – Cover Page***  
**CRD# 121880**

3046 Breckenridge Lane  
Suite 104  
Louisville, Kentucky 40220  
(502) 384-3890

[www.Pillar.net](http://www.Pillar.net)

**March 26, 2023**

This Brochure provides information about the qualifications and business practices of PFA Financial Advisors, LLC. If you have any questions about the contents of this Brochure, please contact us at (502) 384-3890 or [greg@pillar.net](mailto:greg@pillar.net). The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state authority. Registration as an Investment Adviser does not imply a certain level of skill or training.

Pillar Financial Advisors, LLC is an investment advisory firm registered with the appropriate regulatory authority. Registration does not imply a certain level of skill or training. Additional information about Pillar Financial Advisors, LLC also is available on the SEC's website at [www.AdviserInfo.sec.gov](http://www.AdviserInfo.sec.gov).

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***Item 2 - Material Changes***

Registered Investment Advisers are required to use the Brochure to inform clients of the nature of advisory services provided, types of clients served, fees charged, potential conflicts of interest and other information. The Brochure requirements include providing a Summary of Material Changes (the "Summary") reflecting any material changes to our policies, practices, or conflicts of interest made since our last required "annual update" filing. In the event of any material changes, such Summary is provided to all clients within 120 days of our fiscal year-end. Our last annual update was filed on March 17, 2022. The complete Brochure is available to clients at any time upon request.

Ben Allison, CFA

Angie Stoner, Client Experience Manager

Greg Curry, CPA/PFS, CFA

Cheri Howard, Operations Manager

Tom Walsh, CFA

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## ***Item 4 - Advisory Business***

### General Information

Pillar Financial Advisors, LLC ("we" or "PFA") was formed in 1997 and provides Wealth Management Services.

Gregory M. Curry and Ben D. Allison are the principal owners of PFA. Please see ***Brochure Supplements, Exhibit A***, for more information on these principal owners and other individuals who formulate investment advice and have direct contact with clients or have discretionary authority over client accounts.

As of December 31, 2022, we managed \$229,091,820 on a discretionary basis, and no assets on a non-discretionary basis.

### **Wealth Management Services**

We believe wealth management services are most successful in full view of your complete financial situation. We begin with preparation of an initial Wealth Management Strategy ("WMS"), followed by continuous financial management, including portfolio management and ongoing wealth planning (described more fully below). By delivering these services through a comprehensive model, we strive to serve as your primary financial professional, coordinating your financial affairs much the way a Chief Financial Officer (CFO) does for a corporation.

### Wealth Planning

Delivering advice on a broad range of financial issues, we seek to bring order, expertise and perspective to every aspect of a family's financial life. In our view, solid wealth planning services are intrinsic to the effective management of your investment portfolio. By including ongoing planning advice along with investment management services, quality time is invested on the front-end solving problems and providing solutions that are designed to alleviate future obstacles and provide a more reliable roadmap to meeting your goals. Wealth planning is not provided as a standalone service; it is solely provided in conjunction with management of your portfolio.

Working together with you, our wealth planning process starts by defining your current overall financial circumstances, long-term financial goals, objectives, and needs. At the conclusion of this phase, we construct a comprehensive Wealth Management Strategy, which includes the following planning considerations, as applicable to each client:

- Cash Flow Analysis and Projections
- Tax Planning
- Retirement Planning
- Risk Management
- Debt Management
- Estate Planning
- Investment Policy Statement ("IPS")

Once the initial WMS is completed, we will manage your portfolio on an ongoing basis in accordance with the IPS. In addition, we will work with your trusted advisors (e.g. attorneys, insurance agents, CPAs, etc.) or with our network of seasoned professionals to assist with the implementation of other aspects of the WMS. Taking an active responsibility in these vital relationships, we aim to ensure these advisors have up-to-date financial and investment information, and that all involved communicate and strategize as a team. In all instances, you are free to determine whether to implement any of the recommendations in the WMS and are under no obligation to engage the services of any recommended professional.

The WMS will generally be updated annually, when you request it, or when determined to be necessary or advisable by us based on updates to your financial or other circumstances.

### Portfolio Management

As a professional asset manager, we design and manage customized investment portfolios tailored to the unique risk characteristics and investment objectives of each client. Based on your personalized WMS, we create an IPS structured to build wealth and maintain your acceptable risk level. The IPS describes our investment philosophy and discipline, your asset allocation, types of securities to be used, tax management and portfolio rebalancing. More information about our investment strategies may be found in ***Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss.***

To implement the portfolio, we will manage your investments on a discretionary basis. As a discretionary investment adviser, we will have the authority to supervise and direct the portfolio without prior consultation with you.

Notwithstanding the foregoing, you may impose certain written restrictions on us in the management of your investment portfolio, such as prohibiting the inclusion of certain types of investments in your investment portfolio or prohibiting the sale of certain investments held in the account at the commencement of our relationship. You should note, however, that if you impose restrictions it may adversely affect the composition and performance of your investment portfolio. You should also note that your investment portfolio is treated individually by giving consideration to each purchase or sale for your account. For these and other reasons, performance of client investment portfolios within the same investment objectives, goals and/or risk tolerance may differ, and you should not expect that the composition or performance of your investment portfolio would necessarily be consistent with similar clients of ours.

### Portfolio Management Services through Institutional Intelligent Portfolios™

For certain clients who do not meet our investment minimum, we will provide standalone portfolio management services through Institutional Intelligent Portfolios™, an automated, online investment management platform provided by Schwab for use by independent investment advisors. The platform is sponsored by Schwab Wealth Investment Advisory, Inc. ("SWIA"), an affiliate of Charles Schwab & Co., Inc. ("Schwab"). Through the platform, SWIA sponsors a Wrap Program ("the Program"), through which we construct and manage model investment strategies, each generally consisting of a portfolio of mutual funds and a cash allocation.

We are your investment adviser and primary point of contact with respect to the Program and are solely responsible for determining the appropriateness of the Program for you. Based on your inputs, we choose a suitable investment strategy and portfolio for your investment needs and goals and manage that portfolio on an ongoing basis. SWIA's role is limited to delivering you the Schwab Wealth Investment Advisory, Inc. Institutional Intelligent Portfolios™ Disclosure Brochure (the "Program Disclosure Brochure") and administering the Program so that it operates as described in the Program Disclosure Brochure.

Your portfolio is held in a brokerage account that you open at Schwab. We are independent of and not owned by, affiliated with, or sponsored or supervised by Schwab or any of its affiliates. We have contracted with SWIA to provide the technology platform and related trading and account management services for the Program. This platform enables us to make the Program available to you online and includes a system that automates certain key parts of our investment process (the "System"). The System also includes an automated investment engine through which we manage your portfolio on an ongoing basis through automatic rebalancing and tax-loss harvesting (if you are eligible and elect).

Communication is primarily conducted with you through electronic channels. You must agree to accept electronic delivery of the Investment Advisory Agreement, disclosure documents, prospectuses, statements, and other materials. We make portfolio managers available to discuss servicing matters with you.

If you participate in the Program, you do not pay commissions on the transactions executed in the Program. As described below in **Item 5 – Fees and Compensation**, if you participate in the Program, you will pay an annual management fee to us.

#### Retirement Plan Rollovers

We are fiduciaries under the Investment Advisers Act of 1940 and when we provide investment advice to you regarding your retirement plan account or individual retirement account, we are also fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. We have to act in your best interest and not put our interest ahead of yours. If we recommend that you transfer an IRA or roll over your retirement plan assets into an account to be managed by us, such a recommendation creates a conflict of interest if we will earn a new (or increase our current) advisory fee because of the transfer/rollover. Investing in an IRA with us may be more expensive than an employer-sponsored retirement plan. You are under no obligation to roll over plan assets to an IRA managed by us or to engage us to monitor and/or manage the account while maintained at your employer.

### ***Item 5 - Fees and Compensation***

#### General Fee Information

Fees paid to us are exclusive of all custodial and transaction costs paid to your custodian, brokers or other third-party consultants. Please see **Item 12 - Brokerage Practices** for additional information. Fees paid to us are also separate and distinct from the fees and expenses charged by mutual funds, ETFs (exchange traded funds) or other investment pools to their shareholders (generally including a management fee and fund expenses, as described in each fund's prospectus or offering materials). You should review all fees

charged by funds, brokers, us and others to fully understand the total amount of fees you pay for investment and financial-related services.

### Wealth Management Fees

We charge a separate, one-time flat fee for the initial WMS. The minimum fee is usually \$2,500; however, the fee may be higher based on the complexity of your financial situation (at our sole discretion). The fee for this service is due upon presentation of the completed WMS to you. Should you elect to terminate the advisory agreement before the initial WMS is completed and presented, you will be assessed a pro-rata fee reflecting the degree to which the WMS is complete.

Fees for ongoing wealth planning and investment management services will be assessed as either a flat retainer fee or a percentage of investment assets under management. You choose which type of fee will be assessed at the beginning of the engagement. Since the minimum flat retainer fee is \$10,000 annually, clients with less than \$1,000,000 of investment assets will generally be assessed an asset-based percentage fee under the investment assets under management calculation.

### ***Flat Fees***

Our flat, annual fee (payable in quarterly installments, in advance) is based in part on the value of your investment portfolio according to the schedule below. Other factors include the nature and complexity of your investments (taxable, tax-deferred, proprietary products, individual stocks, privately held businesses, etc.) and the complexity of your overall financial situation (marital status, family situation, sources of income, etc.). Fees may be higher if you are self-employed.

<b><u>Investment Assets</u></b>	<b><u>Fee Range</u></b>
Up to \$1,000,000	\$10,000 - \$12,000
\$1,000,000 - \$2,000,000	\$10,000 - \$20,000
\$2,000,000 - \$5,000,000	\$17,500 - \$30,000
\$5,000,000 or more	\$25,000 or more

Flat retainer fee amounts are quoted and agreed to by you at the beginning of the engagement. The first payment is due upon your acceptance of your completed WMS and will be prorated based on the number of days remaining in the calendar quarter. After the initial year, the ongoing flat service fee will be increased each year by US inflation (Seasonally Adjusted CPI-U) and rounded up or down to the nearest five-dollar increment. The quarterly fee may also be adjusted to reflect a material change in your financial situation. We will provide you a written notification of any fee changes. It is difficult to pinpoint the retainer fee a potential client will be charged based on just one or two factors. A single person may have a more complicated situation than a married couple with the same level of income. A person with a relatively low-income level may have a more complicated situation, because of investments or family needs, than someone with a higher income. And a self-employed person may have greater needs and opportunities than an employed person with the same income. Therefore, the fee schedule lists ranges which overlap as the investment brackets change.

**Asset-Based Percentage Fees**

The annual fee schedule, based on a percentage of assets under management, is as follows:

First \$1,000,000	1.00%
Next \$2,000,000	0.75%
Next \$2,000,000	0.50%
Next \$5,000,000	0.25%
Amounts over \$10,000,000	0.10%

Portfolio management fees are generally payable quarterly, in arrears. Fees are rounded to the nearest whole dollar and are prorated for deposits to and withdrawals from the account. If management begins after the start of a quarter, fees will be prorated accordingly. With your authorization and unless other arrangements are made, fees are normally debited directly from your account(s).

We may, at our discretion, make exceptions to the foregoing or negotiate special fee arrangements where we deem it appropriate under the circumstances. Therefore, some clients may pay more or less than other clients for the same management services, depending, for example, on account inception date, number of related investment accounts or total assets under management. Further, some clients' fee schedules are based on prior contractual arrangements and/or historical fee schedules that differ from our current fee arrangements.

Either party may terminate our Wealth Management Agreement at any time, subject to any written notice requirements in the agreement. In the event of termination, any paid but unearned fees will be promptly refunded to you based on the number of days that the account was managed, and any fees due to us from you will be invoiced or deducted from your account prior to termination.

**Institutional Intelligent Portfolios™ Fees**

Fees for portfolio management through the Program are individually negotiated with each client and may be a fixed fee or an asset-based fee not to exceed 1.0% annually. Among other things, the fee will be based on any related family accounts, pro bono activities, anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, courtesy accounts, etc. Your specific fee arrangement and payment method will be detailed in your agreement with us.

Our fees are not set or supervised by Schwab. You do not pay commissions on the transactions executed in the Program. Some of the securities used in the Program may be available for commission-free trading by all Schwab customers even if they do not participate in this Program. Therefore, you may not receive any extra benefit from the commission-free trading this Program provides.

Schwab does receive other revenues in connection with the Program, as described in the Program Disclosure Brochure. Schwab does receive other revenues, including (i) the profit earned by Charles Schwab Bank, SSB, a Schwab affiliate, on the allocation to the Schwab Intelligent Portfolios Sweep Program described in the Schwab Intelligent Portfolios Sweep Program Disclosure Statement; (ii) investment advisory and/or administrative service fees (or unitary fees) received by Charles Schwab Investment Management, Inc., a Schwab affiliate, from Schwab ETFs™ Schwab Funds®; (iii) fees received by Schwab from mutual

funds in the Schwab Mutual Fund Marketplace®; and (iv) remuneration Schwab receives from the market centers where it routes ETF trade orders for execution. These revenue sources combine and cover any expenses, such as trading costs, which clients who invest in the same securities outside the program might have to pay separately. We do not receive any portion of this revenue.

#### Other Compensation

Gregory Curry or Ben Allison, Advisors of PFA, may serve as an expert witness in litigation involving securities and investment issues. The fee for this service is \$250 per hour, payable in arrears.

Advisory Representatives of PFA may conduct seminars, workshops, or 401(k) and IRA educational services, which may include presentations on Investment Management, financial planning, various investment and risk management strategies, tax and estate planning, retirement and college planning. We may charge a seminar or workshop fee to those in attendance or to the companies sponsoring such programs. Fees vary depending upon the complexity of a seminar's content, the length of service and the materials provided. Fees are due prior to or on the day of the seminar or presentation and are as set forth in the seminar announcement or as prearranged with a company sponsor by Agreement. Cancellation and refund provisions are clearly disclosed in the seminar invitation or announcement. Attendees are under no obligation to do so but are welcome to engage individualized services with us.

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

We do not have any performance-based fee arrangements. "Side-by-Side Management" refers to a situation in which the same firm manages accounts that are billed based on a percentage of assets under management and at the same time manages other accounts for which fees are assessed on a performance fee basis. Because we have no performance-based fee accounts, we have no side-by-side management.

#### ***Item 7 - Types of Clients***

We serve individuals, trusts, and estates. We typically require a minimum portfolio value of \$500,000 for Wealth Management Services. The minimum flat retainer fee is \$10,000 annually. We also provide Standalone Portfolio Management Services on the Schwab IIP Platform, which requires a minimum portfolio of \$5,000. Under certain circumstances and in our sole discretion, we may negotiate such minimums.

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

##### Methods of Analysis

In accordance with your Investment Plan, we will primarily invest in mutual funds, ETFs, and to a lesser extent, fixed income securities. We may also invest in some common stock upon your request. We generally recommend long-term investment strategies requiring a minimum of a three to five-year time horizon and holding period.

We believe that the majority of clients are risk-averse and that markets are basically efficient. Investment management is focused on portfolios as a whole, with a view to total risk-reward parameters. Parallel with our consideration of which asset classes should be held and in what amounts, we consider where these asset classes should be held in your portfolio for the most tax efficiency. Tax deferred accounts have the potential to make a



big difference for investors, especially when matched with investments that may be subject to significant taxation. Therefore, we seek to design solid plans for asset allocation and within that framework maintain a strategy for optimal asset location.

Passive investment strategies are primarily employed in client portfolios with an aim to maximizing returns over the long run, without attempting to profit from short-term price fluctuations. Passive investing involves building portfolios that are comprised of various distinct asset classes. These asset classes are weighted in a manner to achieve a desired relationship between correlation, risk and return. Passive investment management is characterized by low portfolio expenses (i.e. the funds inside the portfolio have low internal costs), minimal trading costs (due to infrequent trading activity), and relative tax efficiency (because the funds inside the portfolio are tax efficient and turnover inside the portfolio is minimal).

We typically recommend that clients invest in no-load mutual funds advised by Dimensional Fund Advisors ("DFA") or Vanguard that have low operating expenses, low portfolio turnover, below average capital gains distributions and a demonstrated expertise and focus in each particular asset class. DFA funds generally are available for investment only by clients of registered investment advisers, and all investments are subject to approval of the adviser. This means you may not be able to make additional investments in DFA funds if your agreement with us is terminated, except through another adviser authorized by DFA.

A portion of your portfolio may be invested through accounts where the available investment vehicles are limited (e.g. employer sponsored retirement plans, annuities). In selecting the investment vehicles to be used in these accounts, we will use the investment options available that we believe best represent the broad asset classes that fit within a diversified portfolio.

Mutual funds and ETFs may invest in a broad range of equity and fixed income securities, including foreign securities and securities of issuers located in emerging markets. Underlying funds may also invest in equity securities of any market capitalization including micro-, small- and mid-cap companies, real estate, commodities-related assets, fixed income securities of any maturity or credit quality, including high-yield, high-risk debt securities, and they may engage in leveraged or derivative transactions. Mutual funds and ETFs are generally evaluated and selected based on a variety of factors, including, as applicable and without limitation, past performance, fee structure, portfolio manager, fund sponsor, overall ratings for safety and returns, and other factors.

Fixed income investments may also be used as a strategic investment, as an instrument to fulfill liquidity or income needs in a portfolio, or to add a component of capital preservation. We will generally evaluate and select individual bonds or bond funds based on a number of factors including, without limitation, rating, yield and duration.

#### Schwab Institutional Intelligent Portfolios

Your accounts will generally be invested in one or more goals-based, model portfolios comprised of mutual funds and a minimum of 4.0% allocated to cash. As noted in **Item 12** below, Schwab is compensated by earning interest on the uninvested cash in your account in Schwab's Cash Features Program. The model portfolios are designed to offer investment options that fit your objectives and desired risk profile across the risk spectrum, ranging from "Conservative" to "Aggressive." The desired risk level is achieved

by controlling the allocation to the various major asset classes – equities, fixed income, and cash.

### Investment Strategies

Our strategic approach is to invest each portfolio in accordance with the IPS that has been developed specifically for each client. This means that the following strategies may be used in varying combinations over time, depending upon your individual circumstances:

- Long Term Purchases – securities purchased with the expectation that the value of those securities will grow over a relatively long period of time, generally greater than one year.
- Short Term Purchases – securities purchased with the expectation that they will be sold within a relatively short period of time, generally less than one year, to take advantage of the securities' short-term price fluctuations.

### Risk of Loss

While we seek to diversify your investment portfolio across various asset classes consistent with your IPS in an effort to reduce risk of loss, all investment portfolios are subject to risks. Accordingly, there can be no assurance that your portfolio will be able to fully meet its investment objectives and goals, or that investments will not lose money.

Below is a description of several of the principal risks that clients should be prepared to bear.

*Management Risks.* While we manage your investment portfolio based on our experience, research and proprietary methods, the value of your portfolio will change daily based on the performance of the underlying securities in which it is invested. Accordingly, your portfolio is subject to the risk that we allocate your assets to individual securities and/or asset classes that are adversely affected by unanticipated market movements, and the risk that our specific investment choices could underperform their relevant indexes.

*Risks of Investments in Mutual Funds, ETFs and Other Investment Pools.* As described above, we may invest a portion of your portfolio in mutual funds and other investment pools ("pooled investment funds"). Investments in pooled investment funds are generally less risky than investing in individual securities because of their diversified portfolios; however, these investments are still subject to risks associated with the markets in which they invest. In addition, pooled investment funds' success will be related to the skills of their particular managers and their performance in managing their funds. Pooled investment funds are also subject to risks due to regulatory restrictions applicable to registered investment companies under the Investment Company Act of 1940.

*ETF Tracking Error Risks.* ETF performance may not exactly match the performance of the index or market benchmark that the ETF is designed to track because 1) the ETF will incur expenses and transaction costs not incurred by any applicable index or market benchmark; 2) certain securities comprising the index or market benchmark tracked by the ETF may, from time to time, temporarily be unavailable; and 3) supply and demand in the market for either the ETF and/or for the securities held by the ETF may cause the ETF shares to trade at a premium or discount to the actual net asset value of the securities owned by the ETF.

*Equity Market Risks.* We may invest portions of your assets directly into equity

investments, i.e., stocks, or into pooled investment funds that invest in the stock market. As noted above, while pooled investments have diversified portfolios that may make them less risky than investments in individual securities, funds that invest in stocks and other equity securities are nevertheless subject to the risks of the stock market. These risks include, without limitation, the risks that stock values will decline due to daily fluctuations in the markets, and that stock values will decline over longer periods (e.g., bear markets) due to general market declines in the stock prices for all companies, regardless of any individual security's prospects.

*Fixed Income Risks.* We may invest portions of your assets directly into fixed income instruments, such as bonds and notes, or may invest in pooled investment funds that invest in bonds and notes. While investing in fixed income instruments, either directly or through pooled investment funds, is generally less volatile than investing in stock (equity) markets, fixed income investments nevertheless are subject to risks. These risks include, without limitation, interest rate risks (risks that changes in interest rates will devalue the investments), credit risks (risks of default by borrowers), or maturity risk (risks that bonds or notes will change value from the time of issuance to maturity).

*Foreign Securities Risks.* We may invest portions of your assets into pooled investment funds that invest internationally. While foreign investments are important to the diversification of client investment portfolios, they carry risks that may be different from U.S. investments. For example, foreign investments may not be subject to uniform audit, financial reporting or disclosure standards, practices or requirements comparable to those found in the U.S. Foreign investments are also subject to foreign withholding taxes and the risk of adverse changes in investment or exchange control regulations. Finally, foreign investments may involve currency risk, which is the risk that the value of the foreign security will decrease due to changes in the relative value of the U.S. dollar and the security's underlying foreign currency.

*Technology and Cyber Security Risks.* We depend heavily on our, and the certainty of our service providers', telecommunication, information technology and other operational systems (e.g., brokers, custodians, transfer agents and other parties to which we outsource certain services or business operations). These systems may fail to operate properly or become disabled as a result of events or circumstances wholly or partly beyond our control. Despite our best efforts to implement security measures, our information technology and other systems, and those of others, could be subject to physical or electronic break-ins, unauthorized tampering or other security breaches, resulting in a failure to maintain the security, availability, integrity and confidentiality of data assets. Technology failures or cyber security breaches, whether deliberate or unintentional, including those arising from use of third-party service providers, as well as failures or breaches suffered by the issuers of securities in which our strategy invests, could delay or disrupt our ability to do business and service our clients, harm our reputation, result in a violation of applicable privacy and other laws, require additional compliance costs, subject us to regulatory inquiries or proceedings and other claims, lead to a loss of clients and revenues or financial loss to our clients or otherwise adversely affect our business, our clients and/or investors.

### ***Item 9 - Disciplinary Information***

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to a client's evaluation of us or the

integrity of our management. We have no disciplinary events to report.

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

Neither PFA nor its Management Persons has any other financial industry activities or affiliations to report.

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

#### Code of Ethics and Personal Trading

We have adopted a Code of Ethics ("the Code"), the full text of which is available to you upon request. Our Code has several goals. First, the Code is designed to assist us in complying with applicable laws and regulations governing our investment advisory business. Under the Investment Advisers Act of 1940, we owe fiduciary duties to our clients. Pursuant to these fiduciary duties, the Code requires persons associated with us (managers, officers and employees) to act with honesty, good faith and fair dealing in working with clients. In addition, the Code prohibits such associated persons from trading or otherwise acting on insider information.

Next, the Code sets forth guidelines for professional standards for our associated persons. Under the Code's Professional Standards, we expect our associated persons to put the interests of our clients first, ahead of personal interests. In this regard, our associated persons are not to take inappropriate advantage of their positions in relation to our clients.

Third, the Code sets forth policies and procedures to monitor and review the personal trading activities of associated persons. From time to time, our associated persons may invest in the same securities recommended to clients. Under the Code, we have adopted procedures designed to reduce or eliminate conflicts of interest that this could potentially cause. The Code's personal trading policies include procedures for limitations on personal securities transactions of associated persons, reporting and review of such trading and pre-clearance of certain types of personal trading activities. These policies are designed to discourage and prohibit personal trading that would disadvantage clients. The Code also provides for disciplinary action as appropriate for violations.

#### Participation or Interest in Client Transactions

Because client accounts are invested almost exclusively in open-end mutual funds and ETFs, there is little opportunity for a conflict of interest between personal trades by our associated persons and trades in client accounts, even when such accounts invest in the same securities. However, in the event of identified potential trading conflicts of interest, our goal is to place client interests first.

Consistent with the foregoing, we maintain policies regarding participation in initial public offerings ("IPOs") and private placements to comply with applicable laws and avoid conflicts with client transactions.

Finally, if associated persons trade with client accounts (i.e., in a bundled or aggregated trade), and the trade is not filled in its entirety, the associated person's shares will be removed from the block, and the balance of shares will be allocated among client accounts in accordance with our written policy.

## ***Item 12 - Brokerage Practices***

### Best Execution and Benefits of Brokerage Selection

When given discretion to select the brokerage firm that will execute orders in client accounts, we seek “best execution” for client trades, which is a combination of a number of factors, including, without limitation, quality of execution, services provided and commission rates. Therefore, we may use or recommend the use of brokers who do not charge the lowest available commission in the recognition of research and securities transaction services, or quality of execution. Research services received with transactions may include proprietary or third-party research (or any combination) and may be used in servicing any or all our clients. Therefore, research services received may not be used for the account for which the particular transaction was affected.

We recommend that clients establish brokerage accounts with Charles Schwab & Co., Inc. (“Schwab”), a FINRA registered broker-dealer, member SIPC, as the qualified custodian to maintain custody of clients’ assets. Although we may recommend that you establish accounts at Schwab, it is ultimately your decision to custody assets with Schwab. We are independently owned and operated and are not affiliated with Schwab.

Schwab Advisor Services provides us with access to its institutional trading, custody, reporting and related services, which are typically not available to Schwab retail investors. Schwab also makes available various support services. Some of those services help us manage or administer our clients’ accounts while others help us manage and grow our business. These services generally are available to independent investment advisors on an unsolicited basis, at no charge to them. These services are not soft dollar arrangements but are part of the institutional platform offered by Schwab. Schwab’s brokerage services include the execution of securities transactions, custody, research, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

If your account is maintained at Schwab, it generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab account. Certain trades may not incur Schwab commissions or transaction fees. Schwab is also compensated by earning interest on the uninvested cash in your account in Schwab’s Cash Features Program. In addition to commissions, Schwab charges you a flat dollar amount as a “prime broker” or “trade away” fee for each trade that we have executed by a different broker-dealer but where the securities bought or the funds from the securities sold are deposited (settled) into your Schwab account. These fees are in addition to the commissions or other compensation you pay the executing broker/dealer. Because of this, in order to minimize your trading costs, we have Schwab execute most trades for your account. We have determined that having Schwab execute most trades is consistent with our duty to seek “best execution” of your trades.

Schwab Advisor Services also makes available to us other products and services that benefit us but may not directly benefit our clients’ accounts. Many of these products and services may be used to service all or some substantial number of our accounts, including accounts not maintained at Schwab.

Schwab’s products and services that assist us in managing and administering clients’

accounts include software and other technology that (i) provide access to client account data (such as trade confirmations and account statements); (ii) facilitate trade execution and allocate aggregated trade orders for multiple client accounts; (iii) provide pricing and other market data; (iv) facilitate payment of our fees from clients' accounts; and (v) assist with back-office functions, recordkeeping and client reporting.

Schwab Advisor Services also offers other services intended to help us manage and further develop our business enterprise. These services may include: (i) technology, compliance, legal and business consulting; (ii) publications and conferences on practice management and business succession; and

(iii) access to employee benefits providers, human capital consultants and insurance providers. Schwab may make available, arrange and/or pay third-party vendors for the types of services rendered to us. Schwab Advisor Services may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to us. Schwab Advisor Services may also provide other benefits such as educational events or occasional business entertainment of our personnel. In evaluating whether to recommend that clients custody their assets at Schwab, we may take into account the availability of some of the foregoing products and services and other arrangements as part of the total mix of factors we consider and not solely on the nature, cost or quality of custody and brokerage services provided by Schwab, which creates a potential conflict of interest.

Please note: With respect to *Schwab Institutional Intelligent Portfolios™*, we do not pay SWIA fees for its services in the Program so long as we maintain at least \$100 million in client assets in accounts at Schwab that are not enrolled in the Program. If we do not meet this condition, then we pay SWIA an annual fee of 0.10% on the value of our clients' assets in the Program. Accordingly, this fee arrangement gives us an incentive to recommend or require that our clients with accounts not enrolled in the Program be maintained with Schwab.

#### Directed Brokerage

Clients may direct us to use a particular broker for custodial or transaction services on behalf of their portfolio. In directed brokerage arrangements, you are responsible for negotiating the commission rates and other fees to be paid to the broker. Accordingly, if you direct brokerage you should consider whether such designation may result in certain costs or disadvantages to you, either because you may pay higher commissions or obtain less favorable execution, or the designation limits the investment options available to you.

The arrangement that we have with Schwab is designed to maximize efficiency and to be cost effective. By directing brokerage arrangements, clients acknowledge that these economies of scale and levels of efficiency are generally compromised when alternative brokers are used. While every effort is made to treat clients fairly over time, the fact that a client chooses to use the brokerage and/or custodial services of these alternative service providers can in fact result in a certain degree of delay in executing trades for their account(s) and otherwise adversely affect management of their account(s).

By directing us to use a specific broker or dealer, clients who are subject to ERISA confirm and agree with us that they have the authority to make the direction, that there are no provisions in any client or plan document which are inconsistent with the direction, that the brokerage and other goods and services provided by the broker or dealer through the

brokerage transactions are provided solely to and for the benefit of the client's plan, plan participants and their beneficiaries, that the amount paid for the brokerage and other services have been determined by the client and the plan to be reasonable, that any expenses paid by the broker on behalf of the plan are expenses that the plan would otherwise be obligated to pay, and that the specific broker or dealer is not a party in interest of the client or the plan as defined under applicable ERISA regulations.

#### Aggregated Trade Policy

We typically direct trading in individual client accounts as and when trades are appropriate based on each client's IPS, without regard to activity in other client accounts. However, from time to time, we may aggregate trades together for multiple client accounts, most often when these accounts are being directed to sell the same securities. If such an aggregated trade is not completely filled, we will allocate shares received (in an aggregated purchase) or sold (in an aggregated sale) across participating accounts on a pro rata or other fair basis; provided, however, that any participating accounts that are owned by us or our officers, directors, or employees will be excluded first.

#### *Trade Aggregation - Schwab Institutional Intelligent Portfolios™*

Neither we nor the Client may give Schwab trading instructions on accounts enrolled in the Program. SWIA, acting as our agent, implements our investment advice via the Program's automated investment engine and communicates required trades to Schwab. . Schwab may aggregate purchase and sale orders for ETFs across accounts SIP, including both accounts for our clients and accounts for clients of other independent investment advisory firms using the Platform.

#### **Item 13 - Review of Accounts**

The WMS is generally reviewed and updated on an annual basis. Managed portfolios are reviewed at least quarterly. Reviews may occur more often if you request, upon receipt of information material to the management of your portfolio, or at any time we deem such review necessary or advisable. These factors generally include but are not limited to, the following: change in your general circumstances (marriage, divorce, retirement); or economic, political or market conditions. Gregory M. Curry, PFA's Principal, Ben Allison, Advisor, or Tom Walsh, Advisor, review client accounts.

Account custodians are responsible for providing monthly or quarterly account statements which reflect the positions (and current pricing) in each account as well as transactions in each account, including fees paid from an account. Account custodians also provide prompt confirmation of all trading activity, and year-end tax statements, such as 1099 forms. In addition, we provide at least a quarterly report for each managed portfolio. This written report normally includes a summary of portfolio holdings and performance results. Additional reports are available at your request.

#### *Schwab Institutional Intelligent Portfolios clients*

We review portfolios enrolled in the SWIA Program at inception and then monitor those portfolios as part of an ongoing process. Portfolios are periodically rebalanced to maintain the original asset allocation targets. When notified of a material change to your investment objectives or risk profile, reviews are conducted by one of our investment adviser representatives to determine an appropriate portfolio based on the new information. You are encouraged to discuss your needs, goals and objectives with us and

to keep us informed of any changes thereto. We will contact you at least annually to review our previous services and/or recommendations and to discuss the impact resulting from any changes in your financial situation and/or investment objectives.

The Program website provides you with access to your account information on a continuing basis. You may obtain real-time portfolio reports which include their account status and holdings. We may also issue periodic information on the website and/or via email to inform you about portfolio performance and other investment and administrative matters. You are provided with transaction confirmation notices and regular summary account statements directly from Schwab. You should compare the account statements you receive from Schwab with those you may obtain from the Program website.

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

As noted above, we receive an economic benefit from Schwab in the form of support products and services it makes available to us and other independent investment advisors whose clients maintain accounts at Schwab. These products and services, how they benefit our firm, and the related conflicts of interest are described in (***Item 12 - Brokerage Practices***). The availability of Schwab's products and services to us is based solely on our participation in the program, and not on the provision of any particular investment advice. Neither Schwab nor any other party is paid to refer clients to us.

#### ***Item 15 - Custody***

Schwab is the custodian of nearly all our client accounts. From time to time however, clients may select an alternate broker to hold accounts in custody. In any case, it is the custodian's responsibility to provide clients with confirmations of trading activity, tax forms and at least quarterly account statements. You are advised to review this information carefully, and to notify us of any questions or concerns. You are also asked to promptly notify us if the custodian fails to provide statements on each account held.

From time to time and in accordance with our agreement with you, we will provide additional reports. The account balances reflected on these reports should be compared to the balances shown on your brokerage statements to ensure accuracy. At times, there may be small differences due to the timing of dividend reporting and pending trades.

PFA has limited custody of some of our clients' funds or securities when the clients authorize us to deduct our management fees directly from the client's account. We are also deemed to have custody of clients' funds or securities when clients have standing authorizations with their custodian to move money from a client's account to a third-party ("SLOA") and under that SLOA authorize us to designate the amount or timing of transfers with the custodian. The SEC has set forth a set of standards intended to protect client assets in such situations, which we follow.

Certain clients have provided us with their personal username and password information to access accounts held away from Schwab directly on the custodian's website. Under these circumstances, PFA will follow additional safeguarding procedures established by the SEC. Specifically, the funds and securities held in accounts for which we have the client's login credentials will be subject to a surprise "custody" examination at least once during each calendar year by an independent public accountant retained by us for that purpose.



***Item 16 - Investment Discretion***

As described in *Item 4 - Advisory Business*, we manage client portfolios on a discretionary basis. For *discretionary accounts*, you will execute a Limited Power of Attorney ("LPOA"), giving us the authority to carry out various activities in your account, generally including the following: trade execution; the ability to request checks on your behalf; and the withdrawal of advisory fees directly from your account(s). We then direct investment of your portfolio using our discretionary authority. You may limit the terms of the LPOA to the extent consistent with your investment advisory agreement with us and the requirements of your custodian.

***Item 17 - Voting Client Securities***

As a policy and in accordance with our agreement, we do not vote proxies related to securities held in your account(s). The custodian of your account(s) will normally provide proxy materials directly to you. You may contact us with questions relating to proxy matters; however, we do not generally perform detailed research regarding proxy voting options.

***Item 18 - Financial Information***

We do not require nor solicit prepayment of more than \$1,200 in fees per client, six months or more in advance, and therefore we have no disclosure required for this item.

Set forth below is the Summary of Material Changes for Pillar Financial Advisors, LLC:

Date of Change	Description of Item
March 2023	Tom Walsh joined Pillar Financial Advisors, LLC and serves as an Advisor and investment adviser representative. For more information about Tom, please see his <b><i>Form ADV Part 2B Supplement</i></b> .

## **Exhibit A**

**Brochure Supplement  
Form ADV Part 2B  
Item 1 - Cover Page**

**Gregory Michael Curry, CFA<sup>®</sup>, CPA, PFS  
CRD# 2824530**

**of**

**Pillar Financial Advisors, LLC**

3046 Breckenridge Lane  
Suite 104  
Louisville, Kentucky 40220  
(502) 384-3890

**[www.Pillar.net](http://www.Pillar.net)**

**March 26, 2023**

This Brochure Supplement provides information about Greg Curry, and supplements the Pillar Financial Advisors, LLC ("PFA") Brochure. You should have received a copy of that Brochure. Please contact us at (502) 384-3890 if you did not receive PFA's Brochure, or if you have any questions about the contents of this Supplement.

Additional information about Greg is available on the SEC's website at  
**[www.AdviserInfo.sec.gov](http://www.AdviserInfo.sec.gov)**.

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***Item 2 - Educational Background and Business Experience***

Gregory Michael Curry (year of birth 1963) is an Owner and Advisor of PFA. Greg graduated from the University of Louisville in 1986 with a BSBA in Accounting. After his graduation, Greg immediately began his career at Coopers & Lybrand (now PricewaterhouseCoopers), serving from January 1987 until October 1989. While employed at Coopers & Lybrand, he obtained his Certified Public Accounting\* (CPA) certificate, passing all parts of the CPA examination on his first attempt. Greg has since been awarded the Personal Financial Specialist\*\* (PFS) designation by the American Institute of Certified Public Accountants.

After leaving Coopers & Lybrand, Greg moved to Capital Holding (renamed Providian, then merged into Aegon, Inc.) as an internal auditor. He stayed with that position for about 2 ½ years until he accepted a position to move to the Institutional Investment

Marketing and Management where he was instrumental in managing and overseeing one of Aegon's largest and most profitable stable value product lines. Greg obtained his Chartered Financial Analyst® designation\*\*\* while at Providian. He decided to leave Aegon in November 1997 to pursue a career in personal financial planning.

In November 1997, Greg formed Pillar Financial Advisors to assist individuals plan and manage their finances.

\*A CPA is a Certified Public Accountant. ALL CPA candidates must pass the Uniform CPA Examination to qualify for a CPA certificate and license to practice public accounting. While the exam is the same regardless of where it is taken, every state/jurisdiction has its own set of education and experience requirements that individuals must meet. However, most states require at least a bachelor's degree and a concentration in accounting, and at least one year of public accounting experience under the supervision of or verification by a CPA. Once the designation is attained, the CPA is required to meet continuing education requirements.

\*\*The PFS designation is granted exclusively to CPAs with the combination of extensive tax expertise and comprehensive knowledge of personal financial planning. The requirements for the PFS credential are established by the PFP (Personal Financial Planning) staff at the AICPA (American Institute of CPAs), the National Accreditation Commission, along with the PFS Credential Committee, and accurately reflect the depth and breadth of experience and technical expertise required to obtain this credential. The 5 major requirements are: (1) Obtain CPA licensure (2) join the AICPA and be a member in good standing (3) complete a comprehensive PFP education, consisting of a minimum of 80 hours of PFP training and education within the five year period preceding the date of the PFS application (4) fulfill 3,000 hours of personal financial planning business experience and (5) pass a PFP examination. Disciplinary Information

There is no disciplinary information to report regarding Greg Curry.

\*\*\*The Chartered Financial Analyst® ("CFA®") designation is a professional designation given by the CFA Institute that measures the competence and integrity of financial analysts. The CFA Program is a graduate-level self-study program that combines a broad-based curriculum of investment principles with professional conduct requirements. Candidates are required to pass three levels of examinations covering areas such as accounting, economics, ethics, money management and security analysis. Before a candidate is eligible to become a CFA charterholder, he/she must meet minimum experience requirements in the area of investment/financial practice. To enroll in the program, a candidate must hold a bachelor's degree.

### ***Item 3 - Disciplinary Information***

Advisers are required to disclose any material facts regarding certain legal or disciplinary events that would be material to your evaluation of an adviser; however, Greg has no such disciplinary information to report.

### ***Item 4 - Other Business Activities***

From time to time, Greg serves as an expert witness in litigation involving securities and investment issues. The fee for this service is \$250 per hour, payable in arrears.

Advisory Representatives of PFA may conduct seminars, workshops, or 401(k) and IRA educational services, which may include presentations on Investment Management, Financial Planning, various investment and risk management strategies, tax and estate

planning, retirement and college planning. PFA may charge a seminar or workshop fee to those in attendances or to the companies sponsoring such programs. Fees vary depending upon the complexity of a particular seminar content, the length of service and the materials provided. Fees are due prior to or on the day of the seminar or presentation and are as set forth in the seminar announcement or as prearranged with a company sponsor by Agreement. Cancellation and refund provisions are clearly disclosed in the seminar invitation or announcement. Attendees are under no obligation to do so but are welcome to engage individualized services with PFA.

Other than serving as an expert witness and conducting seminars and/or workshops, Greg is not engaged in any other investment-related business or occupation and does not earn compensation for the sale of any other products or services.

***Item 5 - Additional Compensation***

Other than as stated above, Greg has no other income or compensation to disclose.

***Item 6 - Supervision***

Greg Curry is an Advisor and co-owner of PFA and serves as Chief Compliance Officer. As Chief Compliance Officer, Greg is responsible for providing compliance oversight to the staff. He also participates as a team member in the investment and trading processes and may be contacted at (502) 384-3890.

**Brochure Supplement  
Form ADV Part 2B  
Item 1 - Cover Page**

**Ben D. Allison, CFA<sup>®</sup>  
CRD# 2867393**

**of**

**Pillar Financial Advisors, LLC**

3046 Breckenridge Lane  
Suite 104  
Louisville, Kentucky 40220  
(502) 384-3890

**[www.Pillar.net](http://www.Pillar.net)**

**March 26, 2023**

This Brochure Supplement provides information about Ben Allison, and supplements the Pillar Financial Advisors, LLC ("PFA") Brochure. You should have received a copy of that Brochure. Please contact us at (502) 384-3890 if you did not receive PFA's Brochure, or if you have any questions about the contents of this Supplement.

Additional information about Ben is available on the SEC's website at  
**[www.AdviserInfo.sec.gov](http://www.AdviserInfo.sec.gov)**.

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***Item 2 - Educational Background and Business Experience***

Ben D. Allison (year of birth 1963) is an Owner and Advisor of Pillar Financial Advisors, LLC. Ben graduated from Miami University, Oxford, OH in 1985 with a BS in Finance. After his graduation, Ben began his career with Citizens Fidelity Bank (now PNC Bank) as a commercial lender serving from May 1985 to September 1989. He then joined one of his clients and worked for the Los Angeles Kings as Director of Special Products working on the NHL expansion, retail stores and other business operations. Ben moved within the organization to become the Executive Director of MultiVision Marketing – leading the implementation of the rotating advertising signage within professional and college sports arenas.

Ben next joined Providian (subsequently acquired by Aegon) in April 1994 as an underwriter within the Institutional Investment Marketing area analyzing the liquidity and investment needs of defined contribution plans. He then went on to become the Director of Stable Value Relationship Management where he was responsible for three underwriters and all relationships with stable value managers representing over \$25 billion in assets. Ben obtained his Chartered Financial Analyst® designation\* in 1998. Ben then joined INVESCO's stable value division in September 1999 as National Director of Marketing responsible for sales and product management of stable value management to institutional defined contribution plans. He then became the Senior Manager for Stable Value Portfolio Management responsible for over \$40 billion in stable value assets. In March 2007, Ben joined others in establishing a global fixed income operation in Louisville for DB Advisors a division of Deutsche Asset Management. As a Director, Product Specialist, he was responsible for communicating all fixed income investment strategies and performance to clients and consultants.

\*The Chartered Financial Analyst® ("CFA®") designation is a professional designation given by the CFA Institute that measures the competence and integrity of financial analysts. The CFA Program is a graduate-level self-study program that combines a broad-based curriculum of investment principles with professional conduct requirements. Candidates are required to pass three levels of examinations covering areas such as accounting, economics, ethics, money management and security analysis. Before a candidate is eligible to become a CFA charter holder, he/she must meet minimum experience requirements in the areas of investment/financial practice. To enroll in the program, a candidate must hold a bachelor's degree.

### ***Item 3 - Disciplinary Information***

Advisers are required to disclose any material facts regarding certain legal or disciplinary events that would be material to your evaluation of an adviser; however, Ben has no such disciplinary information to report.

### ***Item 4 - Other Business Activities***

Ben is not engaged in any other business activities.

### ***Item 5 - Additional Compensation***

Ben has no other income or compensation to disclose.

### ***Item 6 - Supervision***

Ben is an Advisor and co-owner of PFA. Greg Curry is also an Advisor and co-owner of PFA and serves as Chief Compliance Officer. As Chief Compliance Officer, Greg is responsible for providing compliance oversight of Ben. He also participates as a team member in the investment and trading processes and may be contacted at (502) 384-3890.



**Brochure Supplement  
Form ADV Part 2B  
Item 1 - Cover Page**

**Thomas E. Walsh, CFA<sup>®</sup>  
CRD# 5702009**

**of**

**Pillar Financial Advisors, LLC**

3046 Breckenridge Lane  
Suite 104  
Louisville, Kentucky 40220  
(502) 384-3890

**[www.Pillar.net](http://www.Pillar.net)**

**March 26, 2023**

This Brochure Supplement provides information about Thomas "Tom" Edward Walsh, and supplements the Pillar Financial Advisors, LLC ("PFA") Brochure. You should have received a copy of that Brochure. Please contact us at (502) 384-3890 if you did not receive PFA's Brochure, or if you have any questions about the contents of this Supplement.

Additional information about Tom is available on the SEC's website at  
**[www.AdviserInfo.sec.gov](http://www.AdviserInfo.sec.gov)**.

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***Item 2 - Educational Background and Business Experience***

Tom Walsh (year of birth 1958) joined Pillar Financial Advisors, LLC in 2023 and serves as an Advisor. Tom graduated from Western Kentucky University with a BA in Mathematics and has an MBA from the University of Louisville. In his early career, Tom was a Marketing Director for Aegon Institutional Markets from 1993 to 2009. In 2009, he founded Cashel Financial Advisors, a registered financial advisory firm, where he delivered comprehensive financial planning and investment management services.

Tom has obtained the Chartered Financial Analyst<sup>®</sup> designation.\*

\*The Chartered Financial Analyst® ("CFA®") designation is a professional designation given by the CFA Institute that measures the competence and integrity of financial analysts. The CFA Program is a graduate-level self-study program that combines a broad-based curriculum of investment principles with professional conduct requirements. Candidates are required to pass three levels of examinations covering areas such as accounting, economics, ethics, money management and security analysis. Before a candidate is eligible to become a CFA charter holder, he/she must meet minimum experience requirements in the areas of investment/financial practice. To enroll in the program, a candidate must hold a bachelor's degree.

***Item 3 - Disciplinary Information***

Advisers are required to disclose any material facts regarding certain legal or disciplinary events that would be material to your evaluation of an adviser; however, Tom has no such disciplinary information to report.

***Item 4 - Other Business Activities***

Tom is also the sole owner and investment adviser representative of Cashel Financial Advisors, LLC ("Cashel"), a registered investment advisory firm he founded in 2009. Tom provides investment advice and financial planning services through this business. Starting March 2023, he will begin transitioning his clients to PFA and the time he spends at Cashel will diminish until all clients are transitioned. Cashel will then be withdrawn from registration and Tom's association with Cashel will end.

***Item 5 - Additional Compensation***

Other than as stated above, Tom has no other income or compensation to disclose.

***Item 6 - Supervision***

As Chief Compliance Officer, Greg Curry is responsible for providing compliance oversight of Tom. Greg may be contacted at (502) 384-3890.