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FORM ADV, PART II Disclosure Brochure

Pursuant to the so-called “brochure rule,” Pragmatic Financial Strategies, Inc, periodically updates Form ADV, Part II. This rule requires that Pragmatic Financial Strategies provide a written document containing the information contained in Form ADV, Part II, to all clients with whom the firm enters into an investment advisory or investment counseling contract. Pragmatic Financial Strategies must deliver this document to a client or prospective client:

- a) not less than 48 hours prior to executing an investment advisory contract with Pragmatic Financial Strategies, or
- b) at the time of executing such contract, in which case the client has the right to terminate the contract with Pragmatic Financial Strategies within five business days without penalty.

Part II of Form ADV contains information relating to Pragmatic Financial Strategies’ business. This information includes types of services offered, fees, types of clients served, types of investments generally recommended, methods of analysis, strategies employed, information sources consulted, educational and business backgrounds of management employees, participation in connection with client transactions, conditions for managing accounts, the nature of discretionary authority, the process for reviewing accounts, custodian used, and the allocation of consulting fees.

The information contained herein relates only to specific questions to which the relevant regulatory agencies request answers. The document is not, and is not intended to be, a marketing brochure, nor is it designed to provide detailed information about all aspects of Pragmatic Financial Strategies’ business. If you have any questions regarding the contents of this brochure, please contact us at 1-(888)-606-6403. 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.

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1. Advisory Services and Fees

Established in 2009, Pragmatic Financial Strategies is an independent fee only financial planning and registered investment advisory firm located in Marietta, Georgia. As a financial planning firm first; we focus on identifying current resources as a foundation to meeting our client's objectives. We have found that financial success is not always determined by your net worth. We feel that rearrangement of resources in a pragmatic manner can be the driving force for your financial success.

The principal business of Pragmatic Financial Strategies consists of financial planning, tax preparation and investment management to individual clients, small businesses, and families. Advice is offered through consultation with the client and may include: assessing a client's assets and liabilities, income and expenses, risk tolerance, tax exposure, and retirement planning needs. The financial planning process involves a review of a client's personal financial needs and goals for the future, with the objective of creating and implementing a financial plan designed to help each client achieve their financial goals.

Pragmatic Financial Strategies develops financial plans for clients without ongoing investment management. The financial plan may include, but is not limited to: a net worth statement; a cash flow statement (aka, a budget); a review of investment accounts, including reviewing asset allocation and offering repositioning recommendations; strategic tax planning; a review of retirement accounts and plans including recommendations; a review of insurance policies and recommendations for changes, if necessary; one or more retirement scenarios; estate planning review and recommendations; and education planning with funding recommendations. Detailed investment advice and specific recommendations may be offered as part of a financial plan. Implementation of the recommendations is at the discretion of the client.

The fee for a financial plan is typically estimated based upon the facts known at the start of the engagement. The fee range for a financial plan is usually between \$500 and \$5,500 and depends on the client's situation. The fee is based upon an hourly billing rate of \$125, and is generally negotiable depending on services. In the event that the client's financial planning needs are substantially different than understood at the initial meeting, more time than initially estimated may be needed to complete the planning process. For example, some clients may wish to evaluate a variety of future scenarios, which takes additional time, and thus may involve more planning time and cost. After delivery of a financial plan, future face-to-face meetings may be scheduled at the client's preference. Follow up planning is also billed at the rate of \$125 per hour if provided on a non-retained basis.

Pragmatic Financial Strategies is strictly a fee-only financial planning and investment management firm. Pragmatic Financial Strategies does not sell annuities, insurance, stocks, bonds, mutual funds, limited partnerships, or other commissioned products. Pragmatic Financial Strategies is not directly affiliated with entities that sell financial products or securities. No commissions in any form are accepted through our firm. No finder's fees are accepted. Investment advice is offered, with the client making the final decision on investment selection unless discretionary authority is provided. Pragmatic Financial Strategies does not act as a custodian of client assets. The client always maintains asset control. Pragmatic Financial Strategies employs principals that have non discretionary and discretionary authority to place trades for clients under a signed investment advisory agreement.

A written evaluation of each client's initial situation is provided to the client, generally in the form of a net worth statement. Periodic reviews may be conducted to communicate reminders of the specific courses of action that need to be taken. Other professionals (e.g., lawyers, accountants, insurance agents, etc.) may be engaged directly by the client on an as-needed basis. Conflicts of interest will be disclosed to the client in the unlikely event they should occur. An initial meeting, which may be by telephone, is free of charge and is considered an exploratory interview to determine the extent to which financial planning and investment management may be beneficial to the client.

The specific manner in which fees are charged by Pragmatic Financial Strategies is established in a client's written investment advisory agreement. The annual fee for investment advisory services are subject to be charged as a percentage of assets under management percentage of household income depending on your situation.

The Investment Management Agreement is an ongoing agreement and constant adjustments are required, the length of service to the client is at the client's discretion. The client or the investment consultant may terminate an agreement by written notice to the other party. At termination, fees will be billed on a pro rata basis for the portion of the quarter completed under the AUM option. The portfolio value at the completion of the prior full billing quarter is used as the basis for the fee computation, adjusted for the number of days during the billing quarter prior to termination.

Each month, you will receive a statement directly from your custodian showing all transactions, positions and credits / debits into or from your account; the statements after the quarter end will reflect these transactions, including the advisory fee paid by you to us under the AUM option.

Certain clients of Pragmatic Financial Strategies with pre-existing relationships may initially be charged fees which are more or less than similar firms of the same size. With regards to retirement related accounts and certain other accounts, the quarterly fees may be less, depending upon a number of factors, including portfolio size, length of employment and relationship to the employee.

2. Minimum Household Size and Annual Fee Minimums and Maximums

No minimum account size is identified for clients who are both Financial Planning and Investment Management clients. Instead, for accounts less than 100,000 a minimum charge of 1% per annum is applied. The officers of Pragmatic Financial Strategies have the discretion to waive the account minimums.

3. Negotiability of Fees

To ensure the equal treatment of all clients, Pragmatic Financial Strategies' fees are generally negotiable. We reserve the right to negotiate fees for clients who have an engagement with us for comprehensive financial planning and tax preparation as well.

4. Fee Billing Process

Investment management fees are billed quarterly, in arrears, meaning that clients are invoiced after the three-month billing period has ended during the second billing cycle. Payment in full is expected upon invoice presentation. Fees are typically deducted from a designated client account to facilitate payment. The client must consent in advance to direct debiting of her/his investment account or personal account. Fees for financial plans or hourly consultations are billed upon completion, with the fee due upon billing.

Custodians may charge transaction fees on purchases or sales of certain mutual funds and exchange-traded funds. These transaction charges are usually small and incidental to the purchase or sale of a security. The selection of the security is more important than the nominal fee that the custodian charges to buy or sell the security. Mutual funds and Exchange Traded Funds generally charge a management fee for their services as investment managers. The management fee is called an expense ratio. For example, an expense ratio of 0.35 means that the mutual fund company charges 0.35% for their services. These fees are in addition to the fees paid by you to Pragmatic Financial Strategies under the AUM option. Performance figures quoted by mutual fund companies in various publications and websites are after their fees have been deducted, so are the net investment returns an investor receives.

5. Types of Clients

Pragmatic Financial Strategies offers investment management services to individuals, families, and businesses.

6. Types of Securities

Pragmatic Financial Strategies provides investment counseling based on our clients goals and objectives. Depending on the return needed to meet those objectives Pragmatic Financial Strategies may recommend the following:

- exchange-listed,
- over-the counter
- foreign-issuer securities
- corporate debt securities
- municipal securities

- United States government securities
- Mutual fund shares.
- Annuities

7. Methods of Analysis, Sources of Information, and Investment Strategies

Pragmatic Financial Strategies focuses on a strategic asset allocation approach centered on your goals, objectives, and risk tolerance. We may use a combination of technical and fundamental methods to assess risks and opportunities in the capital markets. Fundamental data helps us identify companies, industries, and sectors with compelling financial characteristics. Technical data help us identify securities with attractive supply demand characteristics.

Throughout our investment management process, we review numerous sources of information: financial newspapers and magazines; inspections of corporate activities; research materials prepared by others; corporate rating services; annual reports, prospectuses, and filings with the SEC; and company press releases.

Asset allocation is the relative mix of cash, fixed income and equity securities suitable for a client's investment portfolio. Pragmatic Financial Strategies believes investment risk is lessened when a portfolio is diversified. Diversification is a disciplined long-term investment strategy that helps prevent overexposure to asset classes or specific securities or identify a fitting time when exposure to an undervalued asset class or security may be present. We combine asset allocation with diversification to ensure a client's portfolio will be managed in a prudent manner. We then implement the strategy to achieve the client's investment objectives. Although strategies may be changed if necessary, adhering to the investment policy statement over the determined time horizon seeks to provide enhanced portfolio returns with reduced volatility. Our approach to investing is also centered on diversification of your portfolio among uncorrelated assets. This approach allows for greater diversification, greater efficiencies, and lower risk. Each client's situation differs based on assets under management and as such Pragmatic Financial Strategies may or may not utilize mutual funds in your portfolio

8. Education and Business Standards

Pragmatic Financial Strategies requires any officer or employee who determines or gives investment advice to clients to demonstrate clear command of the firm's investment discipline, its principles and implementation, and its suitability for clients. Pragmatic Financial Strategies takes its fiduciary responsibilities very seriously, and ensures to the maximum possible extent that its professionals meet high standards of financial sophistication as evidenced by education and/or experience.

9. Code of Ethics

The Pragmatic Financial Strategies Code of Ethics is very important to our company. All investment advisory services will be delivered in accordance with the following standard of care:

- Integrity
- Objectivity
- Competence
- Fairness
- Confidentiality
- Professionalism
- Diligence

10. Participation or Interest in Client Transactions

From time to time, Pragmatic Financial Strategies' officers invest alongside the firm's clients, both to align the interests of firm personnel and firm clients and as an expression of confidence in our investing philosophy. In order to ensure that Pragmatic Financial Strategies personnel never "trade ahead" of their clients, the firm requires all trading in specific positions for officer and employee accounts to come *after* the analogous trades are executed for client accounts. Given that the firm may establish (or close) client positions in particular securities over multiple trading days, Pragmatic Financial Strategies' prohibition on trading ahead refers not only to intraday sequence but across days as well, sometimes even weeks. Firm personnel communicate freely and frequently among themselves in order to ensure the application of these important restrictions.

11. Review of Accounts

We regularly review client accounts on a daily, monthly, quarterly, semi-annual, and annual basis. While the nature of each review is somewhat different, they are purposefully designed to ensure each account is maintained in accordance with a client's goals and objectives or investment policy statement. These reviews effectively identify any issues that may require immediate attention. Should such an instance occur, appropriate actions are taken as necessary. Accounts are reviewed by Jason B. Culp CFP®, Founder & CEO

Daily:

Confirm and reconcile all account activity between internal reporting system and custodian reported transactions.

Monthly:

- Compare asset allocation vs. target; reallocate as necessary
- Identify concentrated positions; reduce as necessary
- Identify large fluctuations in bond prices; take action as necessary
- Reconcile any ending monthly balance differences between internal reporting system and custodian reported amounts
- Assess that an account's appreciation/depreciation is reasonable and in situations where it is not identify reasons for deviation and take action as necessary
- Verify all withdrawals are supported by client requests

Quarterly:

Evaluate performance vs. relevant benchmark(s), determine cause for deviations (positive or negative) and, as appropriate, develop internal recommendations for potential portfolio changes. We evaluate accounts in aggregate and the individual holdings for compliance with stated goals or Investment Policy Statements (IPS). Departures, if any, from the client's goals or IPS will be identified and a suitable recommendation to resolve the issue(s) implemented.

Semi-Annual/Annual:

This account review is an integrated and comprehensive evaluation of client portfolios. We consider the results of reviews conducted during the last month and quarter along with meetings and discussions with the client. With this information and the client's prospective needs understood, we carefully examine any pending or proposed strategic changes to the investment portfolio.

In addition to the reviews listed above, portfolio evaluations may also arise in response to changing client circumstances, goals and objectives or current market conditions. Reports are furnished to our clients on a quarterly basis by our contracted custodian. These reports may include performance for the most recent quarter, YTD, trailing 12 months, 3 year, 5 year and since inception periods (as applicable). For comparison purposes, performance is reported along with relevant and appropriate benchmarks. Additionally, the reports include current data regarding client accounts as of the report date – asset allocation, diversification metrics, fixed income ratings; asset balances per account and in the aggregate, and aggregate quarterly account activity.

12. Investment and Brokerage Discretion

Pragmatic Financial Strategies manages client accounts on a discretionary and non discretionary basis. The firm's discretion in portfolio management is guided by our investment discipline. Pragmatic Financial Strategies uses BNY Mellon/Pershing, LLC as its custodian for private client assets. The firm has chosen this custodian on the basis of its reasonable, straightforward management structure, integrity, and financial stability. Pragmatic Financial Strategies benefits from certain services and information provided to the firm by Shareholder Services Group our third party custodian but we do not have discretion as to the trade fees our clients pay on certain transactions.

As a function of Pragmatic Financial Strategies choosing BNY Mellon/Pershing LLC as the custodian for its private clients' assets, the firm enjoys access to certain research reports to which we might not otherwise have access. The availability of these reports is in no way a function of the number or type of trades the firm executes on behalf of its clients. Pragmatic Financial Strategies receives no cash benefits from Pershing LLC.

13. Financial Information

Pragmatic Financial Strategies does not have any financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.

14. Disciplinary Information

Pragmatic Financial Strategies has never been the subject of an investment related regulatory or legal complaint. To the best of our knowledge, no employee has ever been the subject of an investment related regulatory complaint or litigation.

15. Privacy Notice

Pragmatic Financial Strategies has adopted policies in order to safeguard the personal information of the firm's clients, their families, their businesses, and other related entities. Pragmatic Financial Strategies' client relationships are deeply personal. We assist our clients with the management of private wealth. As a Pragmatic Financial Strategies client, you entrust us with detailed personal information concerning yourself, your family, your investments, your business, and your estate and financial planning. Maintaining the security of confidential client information is a top priority for Pragmatic Financial Strategies. This privacy notice explains the firm's collection, use, retention, and disclosure of information about you and others in your household.

How We Gather Information

In order to deliver suitable financial planning, tax, and investment advice, Pragmatic Financial Strategies necessarily collects and stores or archives detailed information about the firm's clients. The types of information we collect include, but are not limited to: names; residential, postal, and business addresses; phone numbers and e-mail addresses; Social Security numbers, including those of family members; detailed financial information including income, tax status and history, net worth data, and asset lists; insurance and estate planning documents; and other personal, household, and business information.

To develop and deliver a suitable financial planning and investment counseling program, Pragmatic Financial Strategies gathers information from a combination of the following sources: client profile forms; bank, brokerage, and trust account statements; financial and estate planning documents; interviews with you, with members of your household, and with trusted advisors such as your accountant, attorney, financial planner, estate planning professional, or broker; transactions we execute on your behalf; and information we receive from you in written, telephonic, or electronic form.

Our Client Privacy Policy

Pragmatic Financial Strategies serves as a fiduciary for its investment counseling clients. In that important capacity, we protect personal information by maintaining physical, electronic, and procedural safeguards that meet or exceed applicable law. We do not sell, share, or divulge confidential information pertaining to Pragmatic Financial Strategies clients to any unaffiliated third party except as outlined in the three categories below. We do disclose, as permitted by law, certain information described above for the purposes outlined below.

Disclosure of Information Required to Conduct Business of Clients' Behalf

In the normal course of conducting business for you and acting as a fiduciary on your behalf, we must necessarily share or disclose some data about you to custodial organizations (which typically also possess detailed information about you as their client), brokerage firms we may select to execute transactions on your behalf, clearing agent firms, and law firms pursuing shareholder class action suits. These organizations have their own privacy and client confidentiality obligations and procedures. You should understand that we would be unable to conduct business on your behalf without disclosing certain limited information about you and your account(s) to these affiliated and unaffiliated third parties.

Disclosure of Information with Your Consent

In the normal course of Pragmatic Financial Strategies' business, clients routinely ask firm personnel to provide confidential information concerning profit and loss records, asset cost bases, portfolio market value, to accountants, attorneys, and other financial professionals such as planners and brokers. Pragmatic Financial Strategies is always pleased to comply with such requests, but we ask that clients provide written or electronic confirmation of their requests in order to ensure that the release of confidential data complies with the spirit and letter of Regulation S-P.

Disclosure of Information to Legally Empowered Regulatory Entities

Pragmatic Financial Strategies is subject to registration requirements with the State of Georgia. Regulatory authorities are empowered by law to perform certain audit functions to ensure that Pragmatic Financial Strategies complies with federal, state, and local laws governing Registered Investment Advisors. In the course of performing such audit functions, regulatory authorities may request information concerning Pragmatic Financial Strategies' clients. In complying with such requests, we take all possible steps to ensure that client information is protected and not removed from Pragmatic

Financial Strategies' offices in any form where it might become subject to public disclosure under applicable state and federal laws. Pragmatic Financial Strategies may also be required to provide information about you without your consent, as permitted by law, to respond to a subpoena or court order or in connection with a proposed or actual sale, merger, or transfer of ownership of our firm. As always, you should not hesitate to contact us with any questions or comments concerning this Privacy Notice or the policies, practices, and procedures it describes.

Pragmatic Financial Strategies Client Recordkeeping Policies

All Pragmatic Financial Strategies clients use a custodial brokerage firm to hold their securities and cash. Any such custodian holds securities, collects (and reinvests, if applicable) dividends and interest, makes disbursements, processes deposits, and handles other routine back-office functions. All custodians track account activity using proprietary technology and provide regular account statements to clients, unless a client declines such regular statements.

Pragmatic Financial Strategies also tracks client account activity using software provided by our primary custodian. When a client establishes a new account or set of accounts with Pragmatic Financial Strategies, we make a concerted effort to determine the cost basis of the client's current portfolio positions. This information is often provided by clients themselves or their accountant, broker, or financial advisor. Insofar as Pragmatic Financial Strategies depends on third parties to provide accurate cost bases, the firm is not always able to provide clients with complete and accurate capital gain and loss information if and when positions are subsequently liquidated.

As part of the investment management process, Pragmatic Financial Strategies tracks various "corporate actions" such as spinoffs, stock splits, tender offers, etc. The firm makes a concerted effort to maintain accurate account records to provide precise data concerning portfolio performance and tax implications. From time to time Pragmatic Financial Strategies receives notice of class action settlements with companies whose stock or bonds we have purchased for client accounts.

If Pragmatic Financial Strategies purchased the security in question, we assume the responsibility of filing for appropriate recovery on behalf of our clients. If we learn of a suit or settlement concerning securities not purchased by Pragmatic Financial Strategies, but prior to entering into a contract with the client, the client bears the responsibility of filing for recovery. If a client cancels our contract and terminates our advisory relationship, Pragmatic Financial Strategies will no longer be obligated to file for recovery on the client's behalf. Pragmatic Financial Strategies and most custodians accept client instructions, authorizations, and notifications sent by electronic mail. One important exception is that we require signed, original copies of any account transfer forms.

Brochure Supplement (Part 2B of Form A)

16. Education and Business Background

Jason B. Culp, Founder & CEO- Senior Private Wealth Advisor

Born 1980

Education

CFA Institute- current CFA Level 1 Candidate 2018

Wharton School of the University of Pennsylvania 2011, Certified Employee Benefit Specialist Program graduate

Oglethorpe University, The Professional Financial Planning Program graduate

Morehead State University, B.A., 2002

Background

President, Pragmatic Financial Strategies, Inc, 2009-present

Retirement Plan Manager- Board of Regents (University System of Georgia)

Teacher/Instructor- Kennesaw State University Certified Financial Planner Program (Insurance Planning)-present

Retirement Plan Consultant- contracted for the Army National Guard, Dobbins Air Force Base -2016 –2018

Retirement Plan Manager (NQDC), Infosys (*Client WellsFargo*), 2008-2016

Financial Planner, The AYCO Company, LP, A Goldman Sachs Co., 2006-2008

Relationship Banker, Washington Mutual Bank, 2004-2006

Sales Manager, Western Southern Life Insurance Co, 2002-2004

Certifications

FLMI, Fellow Life Management Institute - Since 1932 the FLMI designation has been the standard of excellence in the field of insurance operations and financial services.

CEBS, Certified Employee Benefit Specialist - The premier designation in total compensation, considered the standard of excellence in the industry. (CEBS) is a professional designation available in both the United States and Canada that indicates a human resource professional's expertise in employee benefits. The program is overseen by the Wharton School of Business at the University of Pennsylvania and at Dalhousie University in Canada. A certified employee benefit specialist has a vast understanding of compensation structures and plan development.

RPA, Retirement Plan Associate - The program is overseen by the Wharton School of Business at the University of Pennsylvania and at Dalhousie University in Canada. A retirement plan associate has a vast understanding of all aspects of retirement plans both qualified and non-qualified.

CFP®, CERTIFIED FINANCIAL PLANNER™ - The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”). The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;

- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board’s *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board’s enforcement process, which could result in suspension or permanent revocation of their CFP® certification.