

Form ADV Part 3 (Form CRS): Relationship Summary

Item 1: Introduction

Pure Financial Advisors, LLC (“PURE”) is an investment adviser registered with the Securities and Exchange Commission. Investment advisory and brokerage services and fees differ, and it is important for you to understand the differences. Free and simple tools are available to research firms and financial professionals at www.investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisers, and investing.

Item 2: Relationships and Services

What investment services and advice can you provide me?

We provide financial planning services that can be to assess, review or make recommendations on a specific issue but we generally provide a comprehensive evaluation process in which numerous strategic recommendations are given. During our data-gathering process, we determine the client’s individual objectives, time horizons, risk tolerance, and liquidity needs. We also review and discuss a client’s prior investment history, as well as family composition and background. We provide general advice on topics that may include investment strategy, retirement planning, tax and budgetary planning, estate planning and business planning. As the client implements the plan recommendations, we suggest the client work closely with his/her attorney, accountant, insurance agent, and/or investment advisor. Financial plans that are implemented and monitored by us are reviewed by your Financial Professional through a series of meetings throughout the year.

Our firm provides portfolio management services to clients using model asset allocation portfolios. Each model portfolio is designed to meet a particular investment profile in terms of risk and expected return over specific time horizons. These model portfolios have equity exposure from 0% to 100% and can be structured with a combination of ETFs, no-load index funds and/or institutional class mutual fund shares. Portfolios are globally diversified to minimize the risk associated with traditional markets. We manage these model portfolios on a discretionary basis. Our discretionary authority allows PURE to determine the security to buy or sell and/or the amount of the security to buy or sell without contacting the client. Clients may limit this authority by giving us written instructions. Model selection is guided by the client’s cash flow needs, risk tolerance, stated objectives as well as tax planning considerations. Accounts are continually monitored and reviewed by the Investment Management department in the context of the investment objectives and guidelines. PURE has no account minimums.

Further, we also provide Pension Consulting Services separately or in combination. While the primary clients for these services will be pension, profit sharing and 401(k) plans, we offer these non-discretionary services, which includes monitoring, where appropriate to corporations, individuals and trusts, estates, and charitable organizations.

We may offer the management of Variable Annuity (VA) sub-accounts to our clients. PURE has approved VA carrier products for this service. PURE manages various model portfolios for each VA carrier product, the model portfolios are monitored and actively managed for the client on a discretionary basis. Sub-account asset allocations are limited by the VA carrier product fund options.

For additional information, please see [Form ADV Brochure](#), Part 2A, items 4, 7, and 8.

Conversation Starter. Ask your financial professional.

- *Given my financial situation, should I choose an investment advisory service? Why or why not?*
- *How will you choose investments to recommend to me?*
- *What is your relevant experience, including licenses, education, and other qualifications? What do these qualifications mean?*

Item 3: Fees, Costs, Conflicts, and Standard of Care

What fees will I pay?

We charge fees for advisory services such as financial planning and asset management. We offer a complimentary, no obligation financial assessment service. Our comprehensive financial planning engagement fees are determined based on the level of the services being provided and the complexity of each client’s circumstances, typically ranging from \$1,000 to over \$5,000. All financial planning fees are agreed upon by you and our firm within a financial planning agreement.

Our investment advisory quarterly fees are calculated as a percentage of the assets under our management, so our fees will

rise and fall with the value of the assets, including cash that we manage for you. As a result, we are economically incentivized to recommend that you place more assets in your account, because as the value increases, so do our fees.

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying. Our fees for management services are based upon a percentage of assets under management and generally range from .40% to 1.60% annually depending on the total quarterly ending gross value of the client's managed accounts.

In addition to our fees, you may be charged transaction fees by your custodian for some of its services. Under a transaction fee arrangement, the more transactions effected in your account, the more fees you will generally pay, and high activity in your account does not assure positive portfolio performance. In addition to advisory and transaction fees, there may be additional fees such as transfer taxes, SEC fees for sales of securities, and similar fees. These additional fees have an adverse impact on the value of your portfolio over time.

Our fees for Pension Consulting Services are either included in the asset management fee or may be up to .50 basis points, depending on the account type. PURE reserves the discretion to reduce or waive the minimum fixed fee if a Pension Consulting client chooses to engage us for our portfolio management.

What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?

When we act as your investment adviser, we are legally required to act in your best interest and not put our interests ahead of yours. At the same time, the way we make money creates some conflicts of interest. For instance, our firm is compensated for assets under management, so we have an incentive to move accounts to our management or add assets to the accounts which we manage for you. Please ask us about these conflicts if you do not understand them, because they can affect the investment advice we provide.

How do your financial professionals make money?

Our financial professionals are compensated based on revenue the firm receives from the households to which they provide advisory and financial planning services. We do not accept any other forms of compensation.

For additional information, please see [Form ADV Brochure](#), Part 2A, items 5, 6, 8, 10, 11, 12 and 14.

Conversation Starter. Ask your financial professional.

- *Help me understand how these fees and costs might affect my investment? If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?*
- *How might your conflicts of interest affect me, and how will you address them?*

Item 4: Disciplinary History

Do your financial professionals have legal or disciplinary history?

No. PURE and its financial professionals have no legal or disciplinary record. Visit www.investor.gov/CRS, for a free and simple search tool to research our firm and our financial professionals.

Conversation Starter. Ask your financial professional.

- *As a financial professional, do you have any disciplinary history? For what type of conduct?*

Item 5: Additional Information

Who is my primary contact person?

Your PURE financial professional will be your primary point of contact. However, you may also contact PURE's Chief Compliance Officer, Danielle Martin at (877) 222-6044 or by email to compliance@purefinancial.com.

Summary of Material Changes

This Client Relationship Summary reflects the following material changes from the version dated February 2022.

- We have updated the typical range of our financial planning engagements fees. (Item 3)
- We have updated how we calculate our financial professional's compensation. (Item 3)