

Item 1: Cover Page

Pure Planning, LLC

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Form ADV Part 2A – Firm Brochure

(925) 309-9865

Dated May 29, 2017

This Brochure provides information about the qualifications and business practices of Pure Planning, LLC, “Pure Planning”. If you have any questions about the contents of this Brochure, please contact us at (925) 309-9865. 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.

Pure Planning, LLC is registered as an Investment Adviser with the State of CA. Registration of an Investment Adviser does not imply any level of skill or training.

Additional information about Pure Planning is available on the SEC’s website at www.adviserinfo.sec.gov which can be found using the firm’s CRD identification number 288189.

Item 2: Material Changes

Business Phone Number has been updated since the original filing. The new phone number for Pure Planning LLC is (925) 309-9865.

Since the original filing Gretchen Caldwell has added an additional Business Activity. Gretchen Caldwell performs contract paraplanning work for outside financial planning firms. She performs administrative tasks during these contract engagements. This activity accounts for approximately 20% of her time.

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Item 4: Advisory Business

Description of Advisory Firm

Pure Planning, LLC is registered as an Investment Adviser with the State of CA. We were founded in February 2017. Gretchen Caldwell is the principal owner of Pure Planning. Because Pure Planning is a new entity, it currently reports no discretionary or non-discretionary Assets Under Management.

Types of Advisory Services

Investment Advisory Services

We offer investment advisory services through use of third-party money managers (“Outside Managers”) for portfolio management services. We assist clients in selecting an appropriate allocation model, completing the Outside Manager’s investor profile questionnaire, interacting with the Outside Manager and reviewing the Outside Manager. Our review process and analysis of outside managers is further discussed in Item 8 of this Form ADV Part 2A. Additionally, we will meet with the client on a periodic basis to discuss changes in their personal or financial situation, suitability, and any new or revised restrictions to be applied to the account. Fees pertaining to this service are outlined in Item 5 of this brochure.

Outside Manager’s we use:

Pure Planning has entered into a collaborative arrangement with First Ascent Asset Management, LLC, an independent investment manager not affiliated with our firm. Through this arrangement Pure Planning may recommend First Ascent’s investment strategies and services to clients, when appropriate, based on client’s individual needs and in relation to the client’s investment objectives, time horizon and risk tolerance.

Pure Planning and First Ascent will act as co-advisors and fiduciaries for your accounts. First Ascent will have discretion to determine the securities to buy and sell within the account, based on its model allocation policy and subject to any reasonable restrictions required by you.

Pure Planning will:

- Assist in the identification of your investment objectives & assist the client in understanding and evaluating First Ascent’s investment management Portfolios
- Determine which of those Portfolios that are suitable for the client based on the client’s goal and objectives
- Monitor your performance and review progress with you
- Recommend reallocation among allocation strategies within the program
- Provide you with First Ascent’s ADV Disclosure Brochure, which you should carefully review for important and specific program details.

Financial Planning

We provide financial planning services on topics such as retirement planning, risk management, college savings, cash flow, debt management, work benefits, and estate and incapacity planning.

Financial planning is an evaluation of a client's current and future financial state by using currently known variables to predict future cash flows, asset values and withdrawal plans. The key defining aspect of financial planning is that through the financial planning process, all questions, information and analysis will be considered as they affect and are affected by the entire financial and life situation of the client. Clients purchasing this service will receive a written or an electronic report, providing the client with a detailed financial plan designed to achieve his or her stated financial goals and objectives.

In general, the financial plan will address any or all of the following areas of concern. The client and advisor will work together to select the specific areas to cover. These areas may include, but are not limited to, the following:

- **Cash Flow and Debt Management:** We will conduct a review of your income and expenses to determine your current surplus or deficit along with advice on prioritizing how any surplus should be used or how to reduce expenses if they exceed your income. Advice may also be provided on which debts to pay off first based on factors such as the interest rate of the debt and any income tax ramifications. We may also recommend what we believe to be an appropriate cash reserve that should be considered for emergencies and other financial goals, along with a review of accounts (such as money market funds) for such reserves, plus strategies to save desired amounts.
- **College Savings:** Includes projecting the amount that will be needed to achieve college or other post-secondary education funding goals, along with advice on ways for you to save the desired amount. Recommendations as to savings strategies are included, and, if needed, we will review your financial picture as it relates to eligibility for financial aid or the best way to contribute to grandchildren (if appropriate).
- **Employee Benefits Optimization:** We will provide review and analysis as to whether you, as an employee, are taking the maximum advantage possible of your employee benefits. If you are a business owner, we will consider and/or recommend the various benefit programs that can be structured to meet both business and personal retirement goals.
- **Estate Planning:** This usually includes an analysis of your exposure to estate taxes and your current estate plan, which may include whether you have a will, powers of attorney, trusts and other related documents. Our advice also typically includes ways for you to minimize or avoid future estate taxes by implementing appropriate estate planning strategies such as the use of applicable trusts.

We always recommend that you consult with a qualified attorney when you initiate, update, or complete estate planning activities. We may provide you with contact information for attorneys

who specialize in estate planning when you wish to hire an attorney for such purposes. From time-to-time, we will participate in meetings or phone calls between you and your attorney with your approval or request.

- **Financial Goals:** We will help clients identify financial goals and develop a plan to reach them. We will identify what you plan to accomplish, what resources you will need to make it happen, how much time you will need to reach the goal, and how much you should budget for your goal.
- **Insurance:** Review of existing policies to ensure proper coverage for life, health, disability, long-term care, liability, home and automobile.
- **Investment Analysis:** This may involve developing an asset allocation strategy to meet clients' financial goals and risk tolerance, providing information on investment vehicles and strategies, reviewing employee stock options, as well as assisting you in establishing your own investment account at a selected broker/dealer or custodian. The strategies and types of investments we may recommend are further discussed in Item 8 of this brochure.
- **Retirement Planning:** Our retirement planning services typically include projections of your likelihood of achieving your financial goals, typically focusing on financial independence as the primary objective. For situations where projections show less than the desired results, we may make recommendations, including those that may impact the original projections by adjusting certain variables (e.g., working longer, saving more, spending less, taking more risk with investments).

If you are near retirement or already retired, advice may be given on appropriate distribution strategies to minimize the likelihood of running out of money or having to adversely alter spending during your retirement years.

- **Risk Management:** A risk management review includes an analysis of your exposure to major risks that could have a significant adverse impact on your financial picture, such as premature death, disability, property and casualty losses, or the need for long-term care planning. Advice may be provided on ways to minimize such risks and about weighing the costs of purchasing insurance versus the benefits of doing so and, likewise, the potential cost of not purchasing insurance ("self-insuring").
- **Tax Planning Strategies:** Advice may include ways to minimize current and future income taxes as a part of your overall financial planning picture. For example, we may make recommendations on which type of account(s) or specific investments should be owned based

in part on their “tax efficiency,” with consideration that there is always a possibility of future changes to federal, state or local tax laws and rates that may impact your situation.

We recommend that you consult with a qualified tax professional before initiating any tax planning strategy, and we may provide you with contact information for accountants or attorneys who specialize in this area if you wish to hire someone for such purposes. We will participate in meetings or phone calls between you and your tax professional with your approval.

Comprehensive Financial Planning

This service involves working one-on-one with a planner over an extended period of time. By paying a monthly or quarterly retainer, clients get continuous access to a planner who will work with them to design their plan. The planner will monitor the plan, recommend any changes and ensure the plan is up to date.

Upon desiring a comprehensive plan, a client will be taken through establishing their goals and values around money. They will be required to provide information to help complete the following areas of analysis: net worth, cash flow, insurance, credit scores/reports, employee benefit, retirement planning, insurance, investments, college planning and estate planning. Once the client’s information is reviewed, their plan will be built and analyzed, and then the findings, analysis and potential changes to their current situation will be reviewed with the client. Clients subscribing to this service will receive a written or an electronic report, providing the client with a detailed financial plan designed to achieve his or her stated financial goals and objectives. If a follow up meeting is required, we will meet at the client's convenience. The plan and the client’s financial situation and goals will be monitored throughout the year and follow-up phone calls and emails will be made to the client to confirm that any agreed upon action steps have been carried out. On an annual basis there will be a full review of this plan to ensure its accuracy and ongoing appropriateness. Any needed updates will be implemented at that time.

Project-Based Financial Planning Package

We offer a Project-Based Financial Planning program for clients who wish to focus on 1-2 specific areas of financial planning. These Project Based plans will include a 90 minute consultation, a written recommendation of what was discussed and a list of action items. Project-based planning will not include investment advisory services.

Examples of project based projects include:

- Get Organized - Organize and digitize financial paperwork.
- Cash Flow & Budgeting Strategy package - Evaluate current income, expenses and debts. Create a workable budget and plan to pay off debts and/or save for future goals.
- Employer Benefits Review Package - Review all basic and fringe benefits offered by client(s) employers.
- Risk Management Review Package - Discuss potential financial risks and evaluate current insurance policies ability to mitigate those risks.
- Merging Finances Package - Ideal for a couple who are combining their finances. This will include a review of cash flow, budgeting and an evaluation of Employee benefits.
- Planning for Baby - Discuss the financial impact of taking time off work, parental leave, child care costs, insurance changes and dependent care benefits.

- College Planning - Calculate approximate future college costs based on timing and type of college. Discuss vehicles for saving/paying for college including 529's, Coverdell accounts and Parent Plus Loans.

Hourly Financial Planning

This service is for individuals who may not desire or need ongoing financial planning and simply want to consult with a planner, as needed, on various financial topics including, but not limited to, those outlined above under Financial Planning. A written plan outlining the planner's recommendations will be prepared and delivered, if applicable to client's needs.

Client Tailored Services and Client Imposed Restrictions

We offer the same suite of services to all of our clients. However, specific client financial plans and their implementation are dependent upon the client Investment Policy Statement which outlines each client's current situation (income, tax levels, and risk tolerance levels) and is used to construct a client specific plan to aid in the selection of a portfolio that matches restrictions, needs, and targets. Client's may impose restrictions on investing in certain securities or types of securities.

Wrap Fee Programs

We do not participate in wrap fee programs.

CCR Section 260.235.2 Disclosure

For clients who receive our Financial Planning services, we must state when a conflict exists between the interests of our firm and the interests of our client. The client is under no obligation to act upon our recommendation. If the client elects to act on any of the recommendations, the client is under no obligation to effect the transaction through our firm.

Item 5: Fees and Compensation

Please note, unless a client has received the firm's disclosure brochure at least 48 hours prior to signing the investment advisory contract, the investment advisory contract may be terminated by the client within five (5) business days of signing the contract without incurring any advisory fees. How we are paid depends on the type of advisory service we are performing. Please review the fee and compensation information below.

For all services & fees outlined below, clients are entitled to a full refund should termination of the contract occur within five (5) business days pursuant to California Code of Regulation, Section 260.235.4(c).

Investment Advisory Services

Investment Advisory Services are offered as an added service to Comprehensive Financial Planning clients, if desired, client's will sign a separate investment advisory agreement prior to engaging in this service. We currently use First Ascent Asset Management, LLC "First Ascent" as our third party manager.

The annual fee for First Ascent's services is \$500 per account. Fees are charged quarterly, in advance, at the beginning of each quarter. First Ascent will debit the client's account at the beginning of each calendar quarter.

Accounts opened during a quarter will be charged a pro-rata fee that will be assessed at the beginning of the first full calendar quarter that First Ascent manages the account. Upon termination of the account First Ascent will refund the prorated portion of any quarterly fee. Fees may be negotiable based on the relationship and specific needs or circumstances related to the client. No increase in the annual or monthly fee shall be effective without agreement from the client by signing a new agreement or amendment to their current advisory agreement. Their fee will be further explained in their ADV Part 2A and client agreement prior to entering into the agreement.

We do not charge a separate fee for Investment Advisory Services and do not receive any portion of the fee charged by First Ascent.

Comprehensive Financial Planning

Comprehensive Financial Planning consists of an upfront charge between \$999 - \$1,999 based on complexity, for the preparation and delivery of the comprehensive financial plan, and an ongoing fee that is paid monthly, in advance, at a rate between \$149 - \$299 per month based on complexity. The fee may be negotiable in certain cases. Pure Planning will not require prepayment of more than \$500 in fees per client, six months or more in advance. Fees for this service may be paid by electronic funds transfer or check. This service may be terminated with 30 days' notice. Upon termination of any account, the fee will be prorated and any unearned fee will be refunded to the client. In the event of early termination, the client will be billed for the hours worked at a rate of \$200.00 per hour. If the initial deposit is greater than the amount billed, then the client will be refunded the difference. If the initial deposit is less, then the client will be billed the difference.

Project-Based Financial Planning Fee

The fees associated with our project-based planning services typically range from \$499 to \$2,499 per project. Project fees take into consideration factors such as the estimated amount of time needed for the engagement, as well as the complexity of your project based on your needs. Credit towards a comprehensive financial planning package will be provided to clients who decide to upgrade within 90 days of a project-based engagement. The fees for this service will involve a \$499 payment at the start of the engagement, with the remainder due upon completion of the project. Fees for this service may be paid by electronic funds transfer or check. Upon termination, the half of the fee that is due up front will be non-refundable, and no further fees will be charged.

Financial Planning Hourly Fee

Occasionally Pure Planning will offer financial planning services on an hourly basis. The hourly rate is \$200 to \$300 per hour; billed in 15 minute increments, and a partial increment will be treated as a whole increment. The hourly fee rate will take into consideration such factors as the expertise necessary for the type of engagement, services to be rendered, as well as any special requirements the client may require. The fee may be negotiable in certain cases and is due at the completion of the engagement. In the event of early termination by client, any fees for the hours already worked will be due. Fees for this service may be paid by electronic funds transfer or check.

Other Types of Fees and Expenses

Our fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which may be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, and other third parties such as custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual fund and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to our fee, and we shall not receive any portion of these commissions, fees, and costs.

Item 12 further describes the factors that we consider in selecting or recommending broker-dealers for client's transactions and determining the reasonableness of their compensation (e.g., commissions).

We do not accept compensation for the sale of securities or other investment products including asset-based sales charges or service fees from the sale of mutual funds.

CCR Section 260.238(j) Disclosure

Please note, lower fees for comparable services may be available from other sources.

Item 6: Performance-Based Fees and Side-By-Side Management

We do not offer performance-based fees.

Item 7: Types of Clients

We provide financial planning and portfolio management services to individuals

We do not have a minimum account size requirement.

Item 8: Methods of Analysis, Investment Strategies and Risk of Loss

When clients have us complete an Investment Analysis (described in Item 4 of this brochure) as part of their financial plan, our primary methods of investment analysis are fundamental, technical, cyclical and charting analysis.

Fundamental analysis involves analyzing individual companies and their industry groups, such as a company's financial statements, details regarding the company's product line, the experience, and expertise of the company's management, and the outlook for the company's industry. The resulting data is used to measure the true value of the company's stock compared to the current market value. The risk of fundamental analysis is that information obtained may be incorrect and the analysis may not provide an accurate estimate of earnings, which may be the basis for a stock's value. If securities prices adjust rapidly to new information, utilizing fundamental analysis may not result in favorable performance.

Use of Outside Managers

We refer clients to third-party investment advisers (“outside managers”). Our analysis of outside managers involve the examination of the experience, expertise, investment philosophies, and past performance of the outside managers in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. We monitor the manager’s underlying holdings, strategies, concentrations and leverage as part of our overall periodic risk assessment. Additionally, as part of our due-diligence process, we survey the manager’s compliance and business enterprise risks. A risk of investing with an outside manager who has been successful in the past is that he/she may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in an outside manager’s portfolio. There is also a risk that a manager may deviate from the stated investment mandate or strategy of the portfolio, making it a less suitable investment for our clients. Moreover, as we do not control the manager’s daily business and compliance operations, we may be unaware of the lack of internal controls necessary to prevent business, regulatory or reputational deficiencies.

Passive Investment Management

We primarily practice passive investment management. Passive investing involves building portfolios that are comprised of various distinct asset classes. The asset classes are weighted in a manner to achieve a desired relationship between correlation, risk and return. Funds that passively capture the returns of the desired asset classes are placed in the portfolio. The funds that are used to build passive portfolios are typically index mutual funds or exchange traded funds.

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).

In contrast, active management involves a single manager or managers who employ some method, strategy or technique to construct a portfolio that is intended to generate returns that are greater than the broader market or a designated benchmark. Academic research indicates most active managers underperform the market.

Material Risks Involved

All investing strategies we offer involve risk and may result in a loss of your original investment which you should be prepared to bear. Many of these risks apply equally to stocks, bonds, commodities and any other investment or security. Material risks associated with our investment strategies are listed below.

Market Risk: Market risk involves the possibility that an investment’s current market value will fall because of a general market decline, reducing the value of the investment regardless of the operational success of the issuer’s operations or its financial condition.

Strategy Risk: The Adviser’s investment strategies and/or investment techniques may not work as intended.

Interest Rate Risk: Bond (fixed income) prices generally fall when interest rates rise, and the value may fall below par value or the principal investment. The opposite is also generally true: bond prices generally rise when interest rates fall. In general, fixed income securities with longer maturities are more sensitive to these price changes. Most other investments are also sensitive to the level and direction of interest rates.

Legal or Legislative Risk: Legislative changes or Court rulings may impact the value of investments, or the securities' claim on the issuer's assets and finances.

Inflation: Inflation may erode the buying-power of your investment portfolio, even if the dollar value of your investments remains the same.

Risks Associated with Securities

Apart from the general risks outlined above which apply to all types of investments, specific securities may have other risks.

Common stocks may go up and down in price quite dramatically, and in the event of an issuer's bankruptcy or restructuring could lose all value. A slower-growth or recessionary economic environment could have an adverse effect on the price of all stocks.

Corporate Bonds are debt securities to borrow money. Generally, issuers pay investors periodic interest and repay the amount borrowed either periodically during the life of the security and/or at maturity. Alternatively, investors can purchase other debt securities, such as zero coupon bonds, which do not pay current interest, but rather are priced at a discount from their face values and their values accrete over time to face value at maturity. The market prices of debt securities fluctuate depending on such factors as interest rates, credit quality, and maturity. In general, market prices of debt securities decline when interest rates rise and increase when interest rates fall. The longer the time to a bond's maturity, the greater its interest rate risk.

Municipal Bonds are debt obligations generally issued to obtain funds for various public purposes, including the construction of public facilities. Municipal bonds pay a lower rate of return than most other types of bonds. However, because of a municipal bond's tax-favored status, investors should compare the relative after-tax return to the after-tax return of other bonds, depending on the investor's tax bracket. Investing in municipal bonds carries the same general risks as investing in bonds in general. Those risks include interest rate risk, reinvestment risk, inflation risk, market risk, call or redemption risk, credit risk, and liquidity and valuation risk.

Exchange Traded Funds prices may vary significantly from the Net Asset Value due to market conditions. Certain Exchange Traded Funds may not track underlying benchmarks as expected.

Investment Companies Risk. When a client invests in open end mutual funds or ETFs, the client indirectly bears its proportionate share of any fees and expenses payable directly by those funds. Therefore, the client will incur higher expenses, many of which may be duplicative. In addition, the client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives). ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net asset value; (ii) the ETF may employ an investment strategy that utilizes high leverage ratios; or (iii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are de-listed from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. The Adviser has no control over the risks taken by the underlying funds in which client's invest.

Item 9: Disciplinary Information

Criminal or Civil Actions

Pure Planning and its management have not been involved in any criminal or civil action.

Administrative Enforcement Proceedings

Pure Planning and its management have not been involved in administrative enforcement proceedings.

Self-Regulatory Organization Enforcement Proceedings

Pure Planning and its management have not been involved in legal or disciplinary events that are material to a client's or prospective client's evaluation of Pure Planning or the integrity of its management.

Item 10: Other Financial Industry Activities and Affiliations

No Pure Planning employee is registered, or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

No Pure Planning employee is registered, or have an application pending to register, as a futures commission merchant, commodity pool operator or a commodity trading advisor.

Pure Planning does not have any related parties. As a result, we do not have a relationship with any related parties.

Pure Planning only receives compensation directly from clients. We do not receive compensation from any outside source. We do not have any conflicts of interest with any outside party.

Recommendations or Selections of Other Investment Advisers

As referenced in Item 4 of this brochure, Pure Planning recommends clients to Outside Managers to manage their accounts. In the event that we recommend an Outside Manager, please note that we do not share in their advisory fee. Our fee is separate and in addition to their compensation (as noted in Item 5) and will be described to you prior to engagement. You are not obligated, contractually or otherwise, to use the services of any Outside Manager we recommend. Additionally, Pure Planning will only recommend an Outside Manager who is properly licensed or registered as an investment adviser.

Clients will not be charged a total management fee over the 3% industry average

Disclosure of Material Conflicts

All material conflicts of interest under CCR Section 260.238(k) are disclosed regarding Pure Planning, its representatives or any of its employees, which could be reasonably expected to impair the rendering of unbiased and objective advice.

Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

As a fiduciary, our firm and its associates have a duty of utmost good faith to act solely in the best interests of each client. Our clients entrust us with their funds and personal information, which in turn places a high standard on our conduct and integrity. Our fiduciary duty is a core aspect of our Code of Ethics and represents the expected basis of all of our dealings. The firm also accepts the obligation not only to comply with the mandates and requirements of all applicable laws and regulations but also to take responsibility to act in an ethical and professionally responsible manner in all professional services and activities.

Code of Ethics Description

This code does not attempt to identify all possible conflicts of interest, and literal compliance with each of its specific provisions will not shield associated persons from liability for personal trading or other conduct that violates a fiduciary duty to advisory clients. A summary of the Code of Ethics' Principles is outlined below.

- Integrity - Associated persons shall offer and provide professional services with integrity.
- Objectivity - Associated persons shall be objective in providing professional services to clients.
- Competence - Associated persons shall provide services to clients competently and maintain the necessary knowledge and skill to continue to do so in those areas in which they are engaged.
- Fairness - Associated persons shall perform professional services in a manner that is fair and reasonable to clients, principals, partners, and employers, and shall disclose conflict(s) of interest in providing such services.
- Confidentiality - Associated persons shall not disclose confidential client information without the specific consent of the client unless in response to proper legal process, or as required by law.
- Professionalism - Associated persons' conduct in all matter shall reflect credit of the profession.
- Diligence - Associated persons shall act diligently in providing professional services.

We periodically review and amend our Code of Ethics to ensure that it remains current, and we require all firm access persons to attest to their understanding of and adherence to the Code of Ethics at least annually. Our firm will provide of copy of its Code of Ethics to any client or prospective client upon request.

Investment Recommendations Involving a Material Financial Interest and Conflicts of Interest

Neither our firm, its associates or any related person is authorized to recommend to a client, or effect a transaction for a client, involving any security in which our firm or a related person has a material financial interest, such as in the capacity as an underwriter, adviser to the issuer, etc.

Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest

Our firm and its “related persons” do not invest in the same securities, or related securities, e.g., warrants, options or futures, which we recommend to clients.

Trading Securities At/Around the Same Time as Client’s Securities

Because our firm and its “related persons” do not invest in the same securities, or related securities, e.g., warrants, options or futures, which we recommend to clients, we do not trade in securities at or around the same time as clients.

Item 12: Brokerage Practices

Factors Used to Select Custodians and/or Broker-Dealers

Pure Planning, LLC does not have any affiliation with Broker-Dealers. Specific custodian recommendations are made to client based on their need for such services. We recommend custodians based on the reputation and services provided by the firm.

1. Research and Other Soft-Dollar Benefits

We currently do not receive soft dollar benefits.

2. Brokerage for Client Referrals

We receive no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

3. Clients Directing Which Broker/Dealer/Custodian to Use

We do recommend a specific custodian for clients to use, however, clients may custody their assets at a custodian of their choice. Clients may also direct us to use a specific broker-dealer to execute transactions. By allowing clients to choose a specific custodian, we may be unable to achieve most favorable execution of client transaction and this may cost clients money over using a lower-cost custodian.

Aggregating (Block) Trading for Multiple Client Accounts

Outside Managers used by Pure Planning may block client trades at their discretion. Their specific practices are further discussed in their ADV Part 2A, Item 12.

Item 13: Review of Accounts

Client accounts with the Investment Management Service will be reviewed regularly on a quarterly basis by Gretchen Caldwell, President and CCO. The account is reviewed with regards to the client’s investment policies and risk tolerance levels. Events that may trigger a special review would be unusual performance, addition or deletions of client imposed restrictions, excessive draw-down, volatility in performance, or buy and sell decisions from the firm or per client's needs.

Clients will receive trade confirmations from the broker(s) for each transaction in their accounts as well as monthly or quarterly statements and annual tax reporting statements from their custodian showing all activity in the accounts, such as receipt of dividends and interest.

Pure Planning will not provide written reports to Investment Management clients.

Item 14: Client Referrals and Other Compensation

We do not receive any economic benefit, directly or indirectly, from any third party for advice rendered to our clients. Nor do we, directly or indirectly, compensate any person who is not advisory personnel for client referrals.

Item 15: Custody

Pure Planning does not accept custody of client funds except in the instance of withdrawing client fees.

For client accounts in which Pure Planning directly debits their advisory fee:

- i. Pure Planning will send a copy of its invoice to the custodian at the same time that it sends the client a copy.
- ii. The custodian will send at least quarterly statements to the client showing all disbursements for the account, including the amount of the advisory fee.
- iii. The client will provide written authorization to Pure Planning, permitting them to be paid directly for their accounts held by the custodian.

Clients should receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains client's investment assets. We urge you to carefully review such statements and compare such official custodial records to the account statements or reports that we may provide to you. Our statements or reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Item 16: Investment Discretion

We use Outside Managers for investment management, and therefore do not exercise discretion. However, the Outside managers we may exercise discretion over client accounts if authorized by the client to do so. The Outside Manager's Form ADV Part 2A and client agreement will address discretionary authority and will be reviewed prior to the client entering into an agreement with the Outside Manager.

Pure Planning will properly secure the client's permission prior to effecting securities transactions in client accounts managed on a non-discretionary basis pursuant to California Code of Regulation, Section 260.237.2(f)(1).

Item 17: Voting Client Securities

We do not vote Client proxies. Therefore, Clients maintain exclusive responsibility for: (1) voting proxies, and (2) acting on corporate actions pertaining to the Client's investment assets. The Client shall instruct the Client's qualified custodian to forward to the Client copies of all proxies and shareholder communications relating to the Client's investment assets. If the client would like our opinion on a particular proxy vote, they may contact us at the number listed on the cover of this brochure.

In most cases, you will receive proxy materials directly from the account custodian. However, in the event we were to receive any written or electronic proxy materials, we would forward them directly to you by mail, unless you have authorized our firm to contact you by electronic mail, in which case, we would forward you any electronic solicitation to vote proxies.

Item 18: Financial Information

Registered Investment Advisers are required in this Item to provide you with certain financial information or disclosures about our financial condition. We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to clients, and we have not been the subject of a bankruptcy proceeding.

We do not have custody of client funds or securities or require or solicit prepayment of more than \$500 in fees per client six months in advance.

Item 19: Requirements for State-Registered Advisers

Gretchen Caldwell

Born: 1977

Educational Background

- 2017– Certificate in Financial Planning, Santa Clara University
- 1999– Bachelors in Economics, University of Nebraska - Lincoln

Business Experience

- 03/2017 – Present, Pure Planning, LLC, President and CCO
- 8/2016 – 1/2017, EP Wealth Advisors, Financial Planning Intern
- 7/2015 – 8/2016, Not Employed
- 12/2013 – 7/2015, Selligy, Senior Account Executive
- 4/2010 – 12/2013, Talent Merchants, Recruiter
- 8/2007 – 3/2010, Stay at Home Mother
- 7/2006 – 7/2007, Wild Packets, Regional Sales Manager

Professional Designations, Licensing & Exams

FINRA Series 65 - Uniform Investment Advisor Law Examination

Other Business Activities

Gretchen Caldwell performs contract paraplanning work for outside financial planning firms. She performs administrative tasks during these contract engagements. This activity accounts for approximately 20% of her time.

Performance Based Fees

Pure Planning is not compensated by performance-based fees.

Material Disciplinary Disclosures

No management person at Pure Planning, LLC has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

Material Relationships That Management Persons Have With Issuers of Securities

Pure Planning, LLC, nor Gretchen Caldwell, have any relationship or arrangement with issuers of securities.

Additional Compensation

Gretchen Caldwell does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through Pure Planning.

Supervision

Gretchen Caldwell, as President and Chief Compliance Officer of Pure Planning, is responsible for supervision. She may be contacted at the phone number on this brochure supplement.

Requirements for State Registered Advisers

Gretchen Caldwell has NOT been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.

Conflicts of Interest

Pursuant to California Code of Regulations Section 260.238 (k) any material conflicts of interest regarding the investment adviser, its representatives or any of its employees are disclosed to the client prior to entering into any Advisory or Financial Planning Agreement.

Business Continuity Plan

Pure Planning Financial maintains a written Business Continuity Plan that identifies procedures related to an emergency or significant business disruptions, including death of the investment adviser or any of its representatives.

Pure Planning, LLC

696 San Ramon Valley Blvd, Suite 251
Danville, CA 94526
(925) 309-9865

Dated March 29, 2017

Form ADV Part 2B – Brochure Supplement

For

Gretchen Caldwell Individual CRD# 6776419

President, and Chief Compliance Officer

This brochure supplement provides information about Gretchen Caldwell that supplements the Pure Planning, LLC (“Pure Planning”) brochure. A copy of that brochure precedes this supplement. Please contact Gretchen Caldwell if the Pure Planning brochure is not included with this supplement or if you have any questions about the contents of this supplement.

Additional information about Gretchen Caldwell is available on the SEC’s website at www.adviserinfo.sec.gov which can be found using the identification number 6776419.

Item 2: Educational Background and Business Experience

Gretchen Caldwell

Born: 1977

Educational Background

- 2017– Certificate in Financial Planning, Santa Clara University
- 1999– Bachelors in Economics, University of Nebraska - Lincoln

Business Experience

- 03/2017 – Present, Pure Planning, LLC, President and CCO
- 8/2016 – 1/2017, EP Wealth Advisors, Financial Planning Intern
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Professional Designations, Licensing & Exams

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Item 3: Disciplinary Information

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Item 4: Other Business Activities

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Item 5: Additional Compensation

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Item 6: Supervision

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Item 7: Requirements for State Registered Advisers

Gretchen Caldwell has NOT been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.