

## Item 1: Cover Page

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# Form ADV Part 2A Investment Adviser Brochure

March 2020

This brochure provides information about the qualifications and business practices of Paraklete® Financial, Inc. If you have any questions about the contents of this brochure, please contact Thomas N. Tillery, Vice President and Chief Compliance Officer at (678) 290-3930, ext.

103 or [ttillery@parakletefinancial.com](mailto:ttillery@parakletefinancial.com). 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. Registration as an investment advisor does not imply a certain level of skill or training.

Additional information about Paraklete® Financial, Inc. is also available on the SEC's website at <https://adviserinfo.sec.gov/Firm/142323>.

1230 Valley Reserve Drive NW  
Kennesaw, GA 30152-4846  
Tel: (678) 290-3930  
Fax: (678) 290-3901  
[ttillery@parakletefinancial.com](mailto:ttillery@parakletefinancial.com)  
[www.parakletefinancial.com](http://www.parakletefinancial.com)

## **Item 2: Summary of Material Changes**

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### **Annual Update**

In this Item of Paraklete<sup>®</sup> Financial, Inc.'s (Paraklete<sup>®</sup> or the Firm) Form ADV 2, the Firm is required to discuss any material changes that have been made to Form ADV since the last Annual Amendment, dated February 22, 2019.

### **Material Changes since the Last Update**

Since the last ADV Annual Amendment filing, there are no material changes to report.

### **Full Brochure Available**

Paraklete<sup>®</sup>'s Form ADV may be requested at any time, without charge by contacting Thomas N. Tillery, Vice President and Chief Compliance Officer at (678) 290-3930 or [ttillery@parakletefinancial.com](mailto:ttillery@parakletefinancial.com).

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## Item 4: Advisory Business

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### **Firm Description and Types of Advisory Services**

Paraklete® Financial, Inc. (Paraklete®) was founded with one very important underlying mission – to eliminate the burden of economic mismanagement by facilitating financial stewardship.

Paraklete® is the Koine Greek word for Advocate. Its primary meaning was "one who is called to someone's aid, as a helper or counselor." It is also the term for Holy Spirit in the New Testament. The word has a rich history and has been transliterated for use in many other languages; Arabic and Hebrew are two examples.

By acting as a "Paraklete" for our clients, we help them navigate the maze of financial decisions that are presented to them on a daily basis. Our advocacy reduces the "financial mistakes" which lead to the "economic mismanagement" of resources. Our advocacy also increases our clients' greatest asset, available time. Having more time enriches the quality of life for both our clients and their families.

Paraklete® is unique in that it is a true fee-for-service integrated financial planning firm; **there are no products sold and no assets managed.** Our primary focus is to financially educate our clients, who are then empowered with the knowledge they need to make correct choices regarding their individual financial situations. Paraklete® collaborates with the client's investment, legal, tax and insurance advisers to develop an overall integrated plan.

Paraklete® is marketed exclusively through a network of select professionals (CPAs, attorneys, bankers and financial advisers).

Paraklete® was founded in 2006, and is principally owned by Susan M. Tillery, CPA/PFS, President and Chief Executive Officer and Thomas N. Tillery, CFP®, AEP®, Vice President and Chief Compliance Officer. Together, Susan and Tom have over 60 years of experience in integrated financial planning, asset protection, estate planning, risk management, investments, philanthropy, and retirement and tax planning.

### **Financial Planning**

We may prepare an integrated financial plan for our clients. Our financial planning services may involve consultation, analysis, and recommendations in the six areas of financial planning, which include (1) financial situation; (2) income taxes; (3) risk management/insurance; (4) investments; (5) financial independence/retirement planning; and (6) estate planning.

In order to make a reasoned recommendation for an individual client, we will perform a review of the variables that are presented. This review may include but would not necessarily be limited to: consideration of the client's overall financial situation; income tax status; personal and business assets; risk profile; investment objectives; and other factors unique to the client's particular circumstances.

We review the client's present financial situation and provide an analysis and recommendations in accordance with stated goals and objectives. This service may include an initial consultation and subsequent follow-up meetings. The services provided in this regard may include, but would not be limited to the following:

- Prepare an annual Statement of Financial Position
- Create a Statement of Cash Flow
- Review client's most recent tax returns and provide tax planning advice
- Review client's insurance and make risk management recommendations
- Review client's estate plan and make recommendations
- Prepare an analysis of financial independence
- Review current investments
- Provide education planning advice

### **Selection of Other Advisers**

We also introduce clients to third-party unaffiliated advisers. Before recommending other advisers to introduce to clients, we conduct due diligence on each adviser and ensure that each is properly licensed or registered.

### **Tailored Relationships**

To the fullest extent possible, we endeavor to tailor our advisory services to meet the specific needs of each client. In order to determine a suitable course of action for an individual client, we review our clients' financial circumstances and other factors that may influence our recommendations. Such review may include, but would not necessarily be limited to, investment objectives, consideration of a client's overall financial condition, income tax status, personal and business assets, and other factors.

### **Fiduciary Statement**

Paraklete® and our employees are fiduciaries who must take into consideration the best interests of our clients. Paraklete® will act with competence, dignity, integrity, and in an ethical manner, when dealing with clients. Paraklete® will use reasonable care and exercise independent professional judgement when conducting investment analysis, promoting our services, and engaging in other professional activities.

As a fiduciary, Paraklete® has the obligation to deal fairly with our clients. Paraklete® has the following responsibilities when working with a client:

- To render impartial advice;
- To make appropriate recommendations based on the client's needs, financial circumstances and investment objectives;
- To exercise a high degree of care and diligence to ensure that information is presented in an accurate manner and not in a way to mislead;

- To have reasonable basis, information, and understanding of the facts in order to provide appropriate recommendations and representations;
- Disclose any material conflict of interest in writing; and
- Treat clients fairly and equitably.

**Wrap Fee Programs**

Paraklete® does not participate in a Wrap Fee Program.

**Client Assets**

Paraklete® does not manage client assets.

## Item 5: Fees and Compensation

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### **Compensation – Financial Planning**

Financial Planning fees will be charged as follows:

#### **Annual, flat/fixed fees**

Our annual fee (flat/fixed) for our financial planning services ranges from \$10,000 to \$150,000.

Paraklete® collects annual fees in three (3) separate installments.

The first installment is calculated as 50% of the total annual fee. (Note that 50% of the financial planning services are provided within 90 calendar days.) The initial payment is due upon a client's engagement of Paraklete® and an invoice is sent to the client with their copy of the engagement letter.

The second installment is calculated as 25% of the total annual fee. Paraklete® will issue an invoice for the second installment 90 calendar days after the client's initial engagement of Paraklete®.

The third installment is calculated as 25% of the total annual fee. Paraklete® will issue an invoice for the third installment 210 calendar days after the client's initial engagement of Paraklete®.

After the first 12 months, the annual fee is reassessed and ranges from \$6,000 to \$150,000, which will be invoiced in advance on a quarterly basis.

#### **Non-annual, flat/fixed fees**

Our non-annual, flat/fixed fees are calculated based on a pre-determined hourly rate and the anticipated number of hours associated with the work to be performed. Hourly fee rates will vary from project to project, however, the standard hourly fee range spans from \$250 to \$650. We require 50% of the total non-annual, flat/fixed fee up front and the balance upon project completion. (Note that most non-annual, flat/fixed fee engagements are completed within 90 calendar days.)

#### **Engagement Terms**

In the event a client terminates the engagement within 7 calendar days of having signed the engagement letter, the client will be entitled to a prorated refund, equal to (83/90% of the \*initial installment).

After the first 7 calendar days, the entire first installment is deemed earned and therefore, non-refundable to the client, and no further installments will be due. If the client terminates the engagement after the 90<sup>th</sup> calendar day but before the 210<sup>th</sup> calendar day, Paraklete® will deem

any previously collected fees as earned and will not issue a refund to the client. Further, any uninvoiced, uncollected fees will not be pursued by Paraklete®.

### **Other Compensation**

Neither Paraklete® nor any of its Supervised Persons (employees) accept compensation for the sale of securities or insurance products.

### **General Information on Compensation and Other Fees**

Specific fee arrangements will be set forth in the client's engagement letter with us. All fees are due within two (2) weeks of the date of delivery of the invoice to the client.

In certain circumstances, fees are negotiable depending on the time involved, complexity of the engagement, special skills needed to solve problems, the application of experience and knowledge of the client's situation.

In addition to our fees, the client may be charged other fees by parties independent from us as part of the implementation of their financial plan. Investment management fees may be charged by investment managers. Brokerage fees/commissions charged to a client for securities trade executions may be billed to the client by the broker-dealer or custodian of record for their account. Any such fees are exclusive of, and in addition to our compensation. The client will be solely and directly responsible for all fees, including fees from other advisers.

Clients should note that similar planning services may (or may not) be available from other registered investment advisers for similar or lower fees.



## **Item 6: Performance-Based Fees and Side-by-Side Management**

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### **Performance-Based Fees**

Neither Paraklete<sup>®</sup> nor any of its Supervised Persons (employees) accepts performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client). Paraklete<sup>®</sup> does not use a performance-based fee structure because of the potential for a conflict of interest. Performance-based compensation may create an incentive for the adviser to recommend strategies that may carry a higher degree of risk to the client.

## Item 7: Types of Clients

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### **Types of Clients**

We will generally provide our services to individuals, high net worth individuals, trusts, and estates.

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

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### **Methods of Analysis**

Paraklete® does not engage in the analysis of publicly-traded securities or recommend specific individual securities or fixed income instruments.

### **Investment Strategies**

The investment strategy for a specific client is based upon the objectives stated by the client during consultations. The client may change these objectives at any time.

Paraklete® does not engage in these investment strategies itself – clients may request an investment manager to assist in and implement these strategies.

### **Risk of Loss**

Investing in securities involves risk of loss that clients should be prepared to bear, including:  
Interest-rate Risk: Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.

- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- **Inflation Risk:** When any type of inflation is present, a dollar next year will not buy as much as a dollar today, because purchasing power is eroding at the rate of inflation.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good

times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

## **Item 9: Disciplinary Information**

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Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Paraklete® or the integrity of Paraklete®'s management. Paraklete® has no information to disclose applicable to this Item.

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

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### **Financial Industry Activities**

Paraklete® is not registered as a broker-dealer, and none of its Supervised Persons (employees) are registered representatives of a broker-dealer.

Neither Paraklete® nor any of its Supervised Persons (employees) is registered as (or associated with) a futures commissions merchant, commodity pool operator, or a commodity trading advisor.

### **Affiliations**

Neither Paraklete® nor any of its Supervised Persons (employees) have a material relationship or arrangement with any related person or financial industry entities.

### **Other Investment Advisors**

Paraklete® may recommend other investment advisors for its clients but does not receive any compensation for these recommendations.

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

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### **Code of Ethics**

We take great pride in our commitment to serving our clients' needs and the integrity with which we conduct our business. In our recent history, the financial services industry has come under significant scrutiny, especially in the area of the inherent responsibility of financial professionals to behave in the best interests of their clients.

We have developed a Code of Ethics ("Code") as a means of memorializing our vision of appropriate and professional conduct in carrying out the business of providing investment advisory services. Our Code addresses issues such as the following:

- Standards of conduct and compliance with applicable laws, rules, and regulations
- Protection of material non-public information
- Conflicts of interest
- Employee disclosure and reporting of personal securities holdings and transactions
- IPO and private placement policy
- Reporting of violations of the Code
- Educating employees about the Code
- Enforcement of the Code

Each of our Supervised Persons (employees) has been furnished with a copy of our Code and has signed their names to a written acknowledgement attesting to their understanding of the Code and acceptance of its terms. Clients and prospective clients can obtain a copy of Paraklete<sup>®</sup>'s Code of Ethics by contacting Thomas N. Tillery at (678) 290-3930.

### **Participation or Interest in Client Transactions**

As described above, Paraklete<sup>®</sup> does not manage client assets. Paraklete<sup>®</sup> and its Supervised Persons (employees) do not recommend to clients, or buy or sell for client accounts, securities in which they have a material financial interest. In addition, Paraklete<sup>®</sup> will not affect any principal or agency cross securities transactions for client accounts.

## Item 12: Brokerage Practices

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### **Research and Other Soft Dollar Benefits**

Soft dollar benefits are items such as research or other products or services that an investment adviser may receive from a broker-dealer(s), or other party, in connection with a client engagement. ***We do not participate in any soft dollar arrangements.***

### **Brokerage for Client Referrals**

Paraklete<sup>®</sup> receives client referrals from financial institutions, such as broker-dealers and other investment advisers. For all referred clients, Paraklete<sup>®</sup> may recommend that the referring broker-dealer, investment adviser, or other institution, with which the client already had an established relationship, be utilized to facilitate any securities transactions that are a part of the financial plan prepared by Paraklete<sup>®</sup>. In certain circumstances, firms like Paraklete<sup>®</sup> may receive client referrals as a result of recommending broker-dealers or other service providers. Paraklete<sup>®</sup>, however, does not participate in any formal arrangements wherein Paraklete<sup>®</sup> receives client referrals from any broker-dealer in return for selecting or recommending such broker-dealer.

### **Directed Brokerage**

As described above, Paraklete<sup>®</sup> does not manage client assets, and does not engage in securities trading activities on behalf of clients.

### **Trade Aggregation**

Since Paraklete<sup>®</sup> does not manage assets, Paraklete<sup>®</sup> does not aggregate or block trades.



## Item 13: Review of Accounts

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### **Reviews**

Paraklete® does not manage assets and therefore does not review clients' portfolios or accounts on an ongoing basis other than as part of the Firm's financial planning services. Following the delivery of the client's financial plan, Paraklete® will follow up with the various parties involved (broker-dealers, investment advisers, attorneys, etc.) to ensure the implementation of the plan. Beyond that, there is no ongoing account review process that will be carried out by Paraklete®. Unless specifically engaged to do so, Paraklete® does not periodically review financial plans for inactive clients. In such cases, the anticipated reviewer will be Mr. Thomas N. Tillery, Vice President and Chief Compliance Officer. Ms. Susan M. Tillery, President / Chief Executive Officer, may serve as a secondary reviewer.

### **Reporting**

Financial Planning clients receive reports as contracted for at the inception of the engagement.

## Item 14: Client Referrals and Other Compensation

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### **Other Compensation**

Other than the compensation arrangements described above in Item 5, Paraklete® does not receive any compensation in connection with the investment advisory services provided to our clients.

### **Compensation – Client Referrals**

Under certain circumstances, firms like ours may compensate other parties for having referred clients or potential investment advisory clients to them. These sorts of arrangements are generally referred to as “solicitor” arrangements. **We do not participate in any solicitor arrangements.**

## Item 15: Custody

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Paraklete® does not have custody of client assets.

## Item 16: Investment Discretion

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### **Non-Discretionary Authority**

Paraklete<sup>®</sup> does not accept discretionary authority to manage accounts.

## Item 17: Voting Client Securities

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### **Proxy Voting**

Paraklete® does not have any authority to and does not vote proxies on behalf of clients. Clients retain the responsibility for receiving and voting proxies for securities maintained in their portfolios; clients receive these proxies directly from either custodians or transfer agents.

## Item 18: Financial Information

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Paraklete<sup>®</sup> has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients and has not been the subject of a bankruptcy proceeding.

Paraklete<sup>®</sup> is not required to provide a balance sheet; Paraklete<sup>®</sup> does not serve as a custodian for client funds or securities and does not require prepayment of fees of both more than \$500 per client, and more than six months in advance.

## **Item 19: Requirements for State Registered Advisers**

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### **Management Background**

Information may be found in Form ADV Part 2B - Investment Adviser Brochure Supplement.

### **Other Business**

Susan M. Tillery, President and Chief Executive Officer, and Thomas N. Tillery, Vice President and Chief Compliance Officer, are co-owners of Financial Planning Advocate, LLC. Financial Planning Advocate, LLC provides curriculum and classroom instruction for various financial planning designations, including, but not limited to, the CFP® and CPA/PFS programs. They spend no more than 10% of their time on this activity.

### **Performance-Based Fees**

Neither Paraklete® nor any Supervised Persons are compensated by performance-based fees.

### **Disciplinary Disclosures**

Neither Paraklete® nor any management persons have been involved in any activities resulting in a disciplinary disclosure.

### **Issuer of Securities**

Neither Paraklete® nor any management persons have any relationships or arrangements with any issuer of securities.

## Form ADV Part 2B – Investment Adviser Brochure Supplement

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### Form ADV Part 2B Investment Adviser Brochure Supplement

**Supervisor: Susan M. Tillery**

**Supervisor of:**  
Patricia Steward  
Thomas N. Tillery

March 2020

This brochure supplement provides information about the Firm's Supervised Persons that supplements the Paraklete<sup>®</sup> Financial, Inc.'s brochure. You should have received a copy of that brochure. Please contact Thomas N. Tillery, Vice President and Chief Compliance Officer if you did not receive Paraklete<sup>®</sup> Financial, Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about the Firm's Supervised Persons is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You may search this site using a unique identifying number, known as a CRD number for each Supervised Person.

1230 Valley Reserve Drive NW  
Kennesaw, GA 30152-4846  
Tel: (678) 290-3930  
Fax: (678) 290-3901  
[ttillery@parakletefinancial.com](mailto:ttillery@parakletefinancial.com)  
[www.parakletefinancial.com](http://www.parakletefinancial.com)



## Educational Background and Business Experience

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### **Education and Business Background**

Paraklete® requires that advisers in its employ have a bachelor's degree and further coursework demonstrating knowledge of financial planning and tax planning. Examples of acceptable coursework include: an MBA, a CFP®, a CFA, a ChFC, JD, CTFA, EA or CPA. Additionally, advisers must have work experience that demonstrates their aptitude for financial planning and investment management.

### **Supervised Persons**

***Susan M. Tillery***

***Born 1958***

CRD #: 2619678

### **Business Background:**

Paraklete® Financial, Inc.

2007 to Present

President and Chief Executive Officer

### **Formal Education after High School:**

University of Georgia

Master of Accounting

University of Georgia

Bachelor of Business Administration / Accounting

### **Professional Designations:**

Certified Public Accountant/ Personal Financial Specialist (CPA/PFS)

Accredited Estate Planner® (Distinguished) Nominee

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***Thomas N. Tillery***

***Born 1958***

CRD #: 1776600

### **Business Background:**

Paraklete® Financial, Inc.

2006 to Present

Vice President / Chief Compliance Officer

### **Formal Education after High School:**

The American College

Master of Science, Financial Services

The Southern Baptist Theological Seminary

Master of Arts, Christian Education

Columbus State University

Bachelor of Arts, English Literature

**Professional Designations:**

Certified Financial Planner (CFP®)

Accredited Estate Planner (AEP®)

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**Patricia Steward**

CRD #: 5769447

**Born 1951**

**Business Background:**

Paraklete® Financial, Inc.

Investment Adviser Representative

2010 to Present

Steward Ingram & Cooper, PLLC

Principal

Certified Public Accountant

1987 to 2018

2018 to Present

**Formal Education after High School:**

University of North Carolina – Chapel Hill

Classes completed for CPA Certification

North Carolina State University

Bachelor of Science, Math Education

**Professional Designations:**

Certified Public Accountant/ Personal Financial Specialist (CPA/PFS)

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**Professional Certifications**

Paraklete®'s Supervised Persons maintain professional designations, which required the following minimum requirements:

**CFP® - Certified Financial Planner**

**Issued by:** Certified Financial Planner Board of Standards, Inc.

**Prerequisites/Experience Required:** Candidate must meet the following requirements:

- A bachelor's degree (or higher) from an accredited college or university, and
- 3 years of full-time personal financial planning experience

**Educational Requirements:** Candidate must complete a CFP® board registered program, or hold one of the following:

- CPA
- ChFC
- Chartered Life Underwriter (CLU)
- CFA
- Ph.D. in business or economics
- Doctor of Business Administration
- Attorney's License

**Examination Type:** CFP® Certification Examination

**Continuing Education/Experience Requirements:** 30 hours every 2 years

***CPA – Certified Public Accountant***

**Issued by:** State Boards of Accountancy

**Prerequisites/Experience Required:** Candidate must meet the following requirements:

- Minimum experience levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA);
- Successful passing of the Uniform CPA Examination

**Educational Requirements:**

- At minimum, a college education (typically 150 credit hours with at least a baccalaureate degree and a concentration in accounting)

**Examination Type:** Uniform CPA Examination

**Continuing Education/Experience Requirements:** Completion of 40 hours of continuing professional education each year (or 80 hours over a two-year period) in order to maintain a CPA license

***PFS – Personal Financial Specialist***

**Issued by:** American Institute of Certified Public Accountants (AICPA)

**Prerequisites/Experience Required:** Candidate must meet the following requirements:

- Must hold an unrevoked CPA license;
- Fulfill 3,000 hours of personal financial planning business experience;

- Complete 80 hours of personal financial planning continuing professional education credits;
- Pass a comprehensive financial planning exam (PFS Exam); and
- Be an active member of the AICPA

**Educational Requirements:** Must meet minimum education requirements for CPA

**Examination Type:** PFS Exam

**Continuing Education/Experience Requirements:** Completion of 60 hours of financial planning continuing professional education credits every three years

***AEP® - Accredited Estate Planner***

**Issued by:** National Association of Estate Planners & Councils

**Prerequisites/Experience Required:** Candidate must meet all of the following requirements:

- Must be an attorney (JD), accountant (CPA), insurance professional and financial planner (CLU/ChFC, CFP®) or trust officer (CTFA)
- Must be in good standing with their professional organization and not be subject to disciplinary investigation
- Must have a minimum of 5 years of experience in estate planning in one or more of the prerequisite professions

**Educational Requirements:** Candidate must complete the following:

- 2 graduate level courses administered by The American College or from another accredited graduate program as part of a master's or doctoral degree unless applicant has 15 or more years of experience as an estate planner

**Examination Type:** Final exam for each course. If self-study through The American College, must be taken at Pearson VUE testing centers, which are proctored.

**Continuing Education/Experience Requirements:** 30 hours every 24 months, including 15 hours in estate planning. Re-certification required annually.

## **Disciplinary Information**

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Neither Paraklete® nor any Supervised Persons have been involved in any activities resulting in a disciplinary disclosure.

## **Other Business Activities**

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Disclosure on Outside Business Activities is provided in Form ADV Part 2A Item 10 – Other Financial Industry Activities and Affiliations.

As disclosed in Form ADV Part 2A Item 5 – Fees and Compensation, neither Paraklete® nor any Supervised Persons receive commissions, bonuses or other compensation based on the sale of securities or other investment products.

Susan M. Tillery, President and Chief Executive Officer, and Thomas N. Tillery, Vice President and Chief Compliance Officer, are co-owners of Financial Planning Advocate, LLC. Financial Planning Advocate, LLC provides curriculum and classroom instruction for various financial planning designations, including, but not limited to, the CFP® and CPA/PFS programs. They spend no more than 10% of their time on this activity.

Patricia Steward is engaged in providing traditional accounting and tax services in her respective CPA firm (see above in Business Background).

## **Additional Compensation**

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No Supervised Person receives any economic benefit outside of regular compensation.

## **Supervision**

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Susan M. Tillery, President, supervises all persons named in this Form ADV Part 2B Investment Adviser Brochure Supplement. Susan M. Tillery supervises these persons by holding regular staff and other ad hoc meetings. In addition, Susan M. Tillery regularly reviews client reports and emails, as well as employees' personal securities transaction and holdings reports. Susan M. Tillery may be reached at (678) 290-3930.

## **Requirements for State Registered Advisers**

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Neither Paraklete® nor any management persons have been involved in any activities resulting in a disciplinary disclosure.

Susan M. Tillery has been the subject of a bankruptcy petition. The bankruptcy petition was discharged in 1993.