

**PVA FINANCIAL LLC**

**Form ADV Part 2A – Firm Brochure**

www.pvafinancial.com

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This Brochure provides information about the qualifications and business practices of PVA Financial LLC “PVA”. If you have any questions about the contents of this Brochure, please contact us at (773) 825-9090. 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.

Additional information about PVA is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov), which can be found using the firm’s identification number, 312523.

PVA Financial LLC is registered as an Investment Adviser. Registration of an Investment Adviser does not imply any level of skill or training.

## Item 2: Material Changes

4. Addition of alternative investments and sub-advisor relationships
5. Increase in minimum IAS Fees for new Clients and outline of sub-advisor fees
8. Additional information related to short-sale risk, option risk and margin risk. Additional risks related to liquidity risk and alternative investments outlined
1. Firm applied for SEC registration.

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## Item 4: Advisory Business

- A. PVA Financial LLC (hereinafter “PVA” or the “Firm”) is a Limited Liability Company organized in the State of Illinois. PVA was formed in July 2018, and the principal owner is Naveen Neerukonda.
- B. PVA offers the following services to advisory clients:

### **Financial Planning Services (FPS)**

PVA offers creation, analysis and evaluation of financial plans for its clients. For those clients that take advantage of this component of our offering, financial plans and financial planning are completed using a goals-based framework. Clients may elect to only utilize FPS if they so choose.

PVA’s financial planning or consultation services could include, depending on the client’s needs and requests, a financial review and analysis of some or all of the following areas:

- Determining Financial Goals & Objectives
- Asset Allocation Review
- Retirement Plan Analysis
- Employee Stock Option Analysis
- Current Portfolio Review
- Education Funding Analysis
- Cost Audit of Current Investments
- Cash Flow Management Review
- Review of Insurance Needs
- Mortgage and Refinance Evaluation
- Estate Plan Review or Development
- Charitable Planning
- Other financial or investment analysis

### **Investment Advisory Services (IAS)**

The IAS we provide are based on each individual client’s financial circumstances and investment objectives. Our investment advisor communicates with each client to discuss the client’s current financial condition and to review the client’s current investment holdings. Based upon each client’s circumstances, we determine an appropriate asset allocation for the client’s investment portfolio, in accordance with the client’s specific financial objectives and risk tolerance and in consideration of other factors, including the client’s time horizon (education funding, home purchase, retirement, legacy planning), liquidity needs, and other available resources (including external retirement plans, projected social security, outside investments, real estate, and insurance). Clients may identify any investment restrictions to be placed on their account. Each client’s financial objectives, risk tolerance, and liquidity needs, along with a recommended asset allocation, are incorporated into an Investment Policy Statement that is customized for each client.

IAS include, but are not limited to, the following:

- Investment strategy
- Personal investment policy
- Asset allocation
- Asset selection
- Risk tolerance
- Regular portfolio monitoring

PVA seeks to provide investment decisions in accordance with the fiduciary duties owed to its accounts and without consideration of PVA economic, investment or other financial interests. To meet its fiduciary obligations, PVA attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and, accordingly, PVA's policy is to seek fair and equitable allocation of investment opportunities/transactions among its clients to avoid favoring one client over another over time. It is PVA policy to allocate investment opportunities and transactions it identifies as being appropriate and prudent.

When appropriate, we utilize the services of third-party investment advisers ("Outside Managers") to assist with the management of Client accounts. 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 Brochure. 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.

#### **Charles Schwab Investment Management, Inc. ("CSIM") as a Sub-Advisor**

Charles Schwab Investment Management, Inc, CRD No. 106753 ("CSIM"), an unaffiliated SEC-registered investment adviser, and a wholly-owned subsidiary of The Charles Schwab Corporation, a Delaware corporation that is publicly traded and listed on the New York Stock Exchange. CSIM provides investment management services for various SMA strategies ("SMA Strategies"). These SMA Strategies include Schwab Intelligent Portfolios®, (the "SIP Program"), Schwab Managed Portfolios™, (the "SMP Program") and Schwab Personalized Indexing™, ("SPI") PVA may utilize SPI as part of the overall strategy to achieve client objectives.

Each SPI strategy is designed to provide exposure to a client's selected equity market segment while seeking to enhance after-tax returns relative to the client's designated index. SPI strategies are benchmarked to a specific index chosen by the client. SPI strategies typically invest directly in an optimized subset of the securities that seeks to track the performance of the designated index by attempting to mimic the characteristics of the designated index, such as the designated index's exposure and risk characteristics. SPI strategies invest both in securities of issuers included in the designated index and securities of issuers that are not included in the designated index. The securities selected for a client's account can be individually tailored based on a client's investment restrictions and account size, as well as tax attributes of the assets held in the account. At times, an index may provide exposure to publicly traded-partnerships which can generate Internal Revenue Service ("IRS") Schedule K-1 tax forms.

SPI strategies are only available for taxable accounts. CSIM seeks to opportunistically harvest net realized capital losses to provide improved returns over the designated index on an after-

tax basis. This is achieved by utilizing tax-efficient optimization methodologies such as tax-loss harvesting, while also accounting for tracking the designated index. Tax-loss harvesting generally means selling a security that has lost value in order to offset capital gains on the investor's tax return. In order to preserve a "harvested" loss CSIM will seek to avoid transactions which may cause a violation of applicable wash sale rules. However, while CSIM will monitor for wash sales within an SPI account, CSIM does not prevent wash sales in all cases, and as a result wash sales may occur from trading in multiple accounts held by a client, including multiple SPI accounts held by the same client.

#### **SyntheticFi LLC ("SyntheticFi") as a Sub-Advisor**

We have a sub-advisory relationship with SyntheticFi LLC, an unaffiliated investment advisor (CRD# 330200/SEC# 801-129765). In exercising our discretion in making investment decisions for our clients, we may determine if it is in a client's best interest to engage SyntheticFi to implement trades in all or a portion of the client's account. If PVA determines that engaging SyntheticFi is in a client's best interest, we will provide the client with SyntheticFi's relevant disclosure documents, including Form ADV 2A, Privacy policy and any other documents necessary to provide a complete description of SyntheticFi's services and fees. Clients are responsible for paying all fees of SyntheticFi.

#### **O'Shaughnessy Asset Management, L.L.C. ("OSAM") as a Sub-Advisor**

We have a sub-advisory relationship with O'Shaughnessy Asset Management, LLC, an unaffiliated investment advisor (CRD# 144594/SEC# 801-681777). In exercising our discretion in making investment decisions for our clients, we may determine if it is in a client's best interest to engage OSAM to implement trades in all or a portion of the client's account. If PVA determines that engaging OSAM is in a client's best interest, we will provide the client with OSAM's relevant disclosure documents, including Form ADV 2A, Privacy policy and any other documents necessary to provide a complete description of OSAM's services and fees. Clients are responsible for paying all fees of OSAM. In September 2019, OSAM launched an investment service called CANVAS®, which is powered by a proprietary research and investment management platform. The CANVAS® system is an interactive, web-based customizable portfolio management platform developed by OSAM that permits PVA to devise a desired investment strategy.

#### **Retirement Plan Consulting (RPC)**

Our firm provides retirement plan services to employer plan sponsors on an ongoing basis. Generally, such services consist of assisting employer plan sponsors or plan named fiduciaries in establishing, monitoring, and reviewing their company's participant-directed retirement plan. As the needs of the plan sponsor dictate, areas of advising could include: design of investment policy statement, investment review and recommendations, fee analysis, participant education, and vendor searches & analysis.

In providing retirement plan services, our firm does not provide any advisory services with respect to the following types of assets: employer securities, real estate (excluding real estate funds and publicly-traded REITs), participant loans, non-publicly traded securities or assets, other illiquid investments, or brokerage window programs (collectively, "Excluded Assets").

Certain plans and/or clients that we may provide services to are regulated under the Employee Retirement Income Securities Act of 1974 (“ERISA”). We will provide employee benefit plan services to the plan sponsor and/or fiduciaries as described above for the fees set forth in Item 5 of this brochure. The services we provide are advisory in nature. We are not subject to any disqualifications under Section 411 of ERISA. In performing fiduciary services, we may be acting as a fiduciary of the plan as defined in Section 3(21)(A)(ii) under ERISA.

### **Retirement Plan Management (RPM)**

Our firm provides retirement plan services to employer plan sponsors on an ongoing basis. Such services consist of assisting employer plan sponsors or plan named fiduciaries in buying and selling securities within the Plan on a discretionary basis. More information on our trading authority is explained in Item 16 of this Brochure. Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors. As the needs of the plan sponsor dictate, areas of advising could also include: design of investment policy statement, investment review and recommendations, fee analysis, participant education, and vendor searches & analysis.

In providing retirement plan services, our firm does not provide any advisory services with respect to the following types of assets: employer securities, real estate (excluding real estate funds and publicly-traded REITs), participant loans, non-publicly traded securities or assets, other illiquid investments, or brokerage window programs (collectively, “Excluded Assets”).

Certain plans and/or clients that we may provide services to are regulated under the Employee Retirement Income Securities Act of 1974 (“ERISA”). We will provide employee benefit plan services to the plan sponsor and/or fiduciaries as described above for the fees set forth in Item 5 of this brochure. We are not subject to any disqualifications under Section 411 of ERISA. In performing fiduciary services, we may be acting as an “investment manager” as defined in section 3(38) of ERISA pursuant to section 402(c)(3) of ERISA.

### **Services Limited to Specific Types of Investments**

PVA limits its investment advice to mutual funds, equities, fixed income securities, ETFs (including ETFs in the gold and precious metal sectors), alternative investments, real estate funds (including REITs) and non-U.S. securities.

Specifically, PVA primarily holds ETFs, mutual funds and individual securities in managed client accounts. Equity allocations typically consist of individual securities, ETFs and mutual funds whereas exposure to other asset classes such as fixed income, alternative investments and foreign equities is typically achieved using ETFs, private funds or mutual funds. Exposure to commodities or real estate may be achieved using either individual securities or ETFs. PVA may seek to beat the market by making tactical asset allocation decisions, investing in single stocks, and or overweighting/underweighting certain regions/sectors or duration/credit quality. As "held away" accounts cannot be directly managed by us, recommendations for these accounts are typically focused on achieving a desired asset allocation using lower cost, passive investing approaches.

### **Retirement Account Advice**

When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income

Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. Under this special rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
  - Never put our financial interests ahead of yours when making recommendations (give loyal advice);
  - Avoid misleading statements about conflicts of interest, fees, and investments;
  - Follow policies and procedures designed to ensure that we give advice that is in your best interest;
  - Charge no more than is reasonable for our services; and
  - Give you basic information about conflicts of interest.
- C. PVA evaluates the managed portfolios of each client to ensure assets are invested in accordance with the client's Investment Policy Statement. PVA will request discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client. PVA offers the same suite of services to all of its clients. However, specific client investment strategies and their implementation are dependent upon both the time at which a particular client is onboarded and the client Investment Policy Statement which outlines each client's current situation (income, return objective, risk tolerance, time horizon, liquidity constraints, and any other relevant constraints). Clients may impose clearly articulated restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent PVA from properly servicing the client account, or if the restrictions would require PVA to deviate from its standard suite of services, PVA reserves the right to end the relationship.
- D. A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and any other administrative fees. PVA does not participate in any wrap fee programs.
- E. As of May 15, 2026, PVA manages \$114,239,227 on a discretionary basis and \$22,614,429 on a non-discretionary basis.

## Item 5: Fees and Compensation

- A. Clients of PVA fit into one of the three following categories:
1. Financial Planning Services (FPS)
  2. Investment Advisory Services (IAS)
  3. Retirement Plan Consulting Services (RPC)
  4. Retirement Plan Management Services (RPM)

For clients who avail only FPS, clients may choose to pay (1) A fixed annual fee, ranging from \$4,500 to \$10,000 per year, paid quarterly in arrears or (2) On an hourly basis for these services at an hourly rate of \$300, with 25% of the estimated fee paid in advance with the remainder paid upon completion. Consideration for full payment upon completion will be made on a case-

by-case basis. The fees are negotiable, and the final fee schedule will be attached as an Exhibit of the FPS Agreement. The client may terminate the agreement without penalty, for full refund of PVA's fees, within five business days of signing the FPS Agreement. Thereafter, clients may terminate the FPS Agreement with written notice. In the event of early termination, the client will be billed for the quarter on a pro-rated basis.

For clients who avail IAS, the fee is calculated as an advisory fee based on assets under management (AUM) as outlined below:

1.00% on the market value of Account \$1,000,000 and under,  
Plus: 0.75% on the market value of Account between \$1,000,001 and \$2,500,000  
Plus: 0.50% on the market value of Account between \$2,500,001 and \$5,000,000  
Plus: 0.25% on the market value of Account over \$5,000,001

Any client who avails IAS, can receive FPS for no additional charge. The IAS fees are negotiable, and the final fee schedule is attached as an Exhibit of the IAS Agreement. The minimum annual IAS Fee is \$7,500. Due to this minimum annual fee, for clients who wish to have PVA manage less than \$375,000, fees on a percentage basis are higher than the industry average even though in addition to IAS, these clients are also receiving comprehensive FPS.

Our RPC and RPM services are billed based on the percentage of Plan assets under management or flat fee basis. The total estimated fee, as well as the ultimate fee charged, is based on the scope and complexity of our engagement with the client. Fees based on a percentage of managed Plan assets will not exceed 1.00%. The fee-paying arrangements will be determined on a case-by-case basis and will be detailed in the signed agreement.

Our firm's fees are in addition to any fee assessed by any mutual or private funds in which Plan assets are invested, record keepers, custodians, certain Outside Managers or third-party administrators. Our firm acknowledges that it receives no compensation of any kind from any party in relation to the services it provides as an independent consultant to the Plan fiduciaries. To the extent that the client requires extraordinary time, effort or travel, client and our firm will agree in advance on any additional compensation and or expense reimbursement.

Clients may terminate any agreement without penalty, for full refund of PVA's fees, within five business days of signing the Agreement. Thereafter, clients may terminate the Agreement on written notice. PVA does not assess any fees related to termination but will be entitled to all management fees earned up to the date of termination.

PVA uses an average of the daily average balance in the client's account throughout the billing period, after taking into account deposits and withdrawals, for purposes of determining the market value of the assets upon which the advisory fee is based.

Any increase in fees will require the Client be given thirty (30) days' prior written notice and an amendment to this agreement which the Client will need to sign. There are no set-up or termination fees.

If PVA and the Client decide to utilize the services of SyntheticFi, SyntheticFi may charge an Annual Management fee not to exceed 0.50% of the loan/option value amount which is calculated by the illustration below: For example, if SyntheticFi manages a client's \$100,000 portfolio and trades a box spread as a synthetic loan on January 1, 2026, that expires on

December 31, 2026, with loan size (value-at expiration) of \$50,000, the monthly management fee for July 2026 would be calculated as  $\$50,000 * 0.50\% * (31/365) = \$21.23$ , regardless of the balance withdrawn. SyntheticFi shall be responsible for sending monthly client fee invoices via email. The fees related to the use of SyntheticFi will be charged to the Client and are independent of any and all fees paid to PVA. PVA does not receive any portion of the fees paid to SyntheticFi.

Certain clients of PVA may benefit from the use of particular long-short strategies. If PVA and the Client decide to utilize the services of OSAM, OSAM charges annual management fees not to exceed 0.45% of assets, paid quarterly in arrears using month-end market values and debited directly from Client account(s). Although OSAM offers other strategies, PVA only utilizes OSAM's services for their equity tax-aware long-short strategy. To execute this strategy, margin would need to be utilized in Client account(s). The costs associated with the use of margin and the services of OSAM will be solely paid by Client from Client account(s). PVA does not receive any portion of the fees paid to OSAM.

- B.** FPS fees are billed as incurred as outlined above. Fixed or Hourly FPS fees are paid via check or bank transfer. IAS Fees are withdrawn directly from the client's accounts with client's written authorization and are paid quarterly in arrears.
- C.** Clients are responsible for the payment of all third-party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by PVA. Please see Item 12 of this brochure regarding broker/custodian.
- D.** Refunds for fees paid in advance will be returned within fourteen days to the client via check or return deposit back into the client's account. Fixed fees that are collected in advance will be refunded based on the prorated amount of work completed at the point of termination. For hourly fees that are collected in advance, the fee refunded will be the balance of the fees collected in advance minus the hourly rate times the number of hours of work that has been completed up to and including the day of termination.
- E.** PVA does 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.

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

PVA does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

## Item 7: Types of Clients

PVA generally provides advisory services to the following types of clients:

- Individuals
- High-Net Worth Individuals
- Trusts or Charitable Organizations
- Pension and Profit Sharing Plans

For FPS, there is no minimum annual fee for those who elect hourly billing. For those clients who utilize FPS and elect fixed-fee, the minimum annual fee is \$4,500. For IAS, the account minimum is \$500,000, which may be waived by PVA in its discretion. PVA also has a minimum annual fee of \$7,500 for IAS which may be waived by PVA in its discretion.

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

### A. METHODS OF ANALYSIS

PVA uses a variety of methods to evaluate the overall financial market, market sectors, mutual funds and various types of securities. The Firm conducts internal research and analysis and also may procure research and analysis from third parties.

Depending upon the type of investment, PVA utilizes a combination of fundamental and technical analysis. Fundamental analysis involves analyzing real data, including overall economic and company-specific information available to determine the value of a particular investment. Technical analysis involves analyzing statistics provided by market activity such as past prices and volume to identify patterns that can be used to predict future activity. In performing these analyses, the Firm may consult third-party research materials, company annual reports and other regulatory filings, and financial newspapers and periodicals.

PVA's strategy does not utilize "leverage," meaning that it does not recommend strategies that would necessitate a client to borrow cash against the value of their securities portfolio in order to fund additional PVA recommended purchases.

**Use of Outside Managers:** We may refer Clients to Third Party Investment Advisers or advisory programs ("Outside Managers"). Our analysis of Outside Managers involves the examination of the experience, expertise, investment philosophies, and past performance of the Outside Managers in an attempt to determine if that Outside Manager has demonstrated an ability to invest over a period of time and in different economic conditions. We monitor the Outside 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 Outside Manager's compliance and business enterprise risks. A risk of investing with an Outside Manager who has been successful in the past is that they may not be able to replicate that success in the future. In addition, we do not control the underlying investments in an Outside Manager's portfolio. There is also a risk that an Outside 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 Outside 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.

### B. INVESTMENT STRATEGY & RISK

PVA generally invests client assets in individual stocks, no-load mutual funds and exchange-traded funds (ETFs) in accordance with its view that this approach offers clients both diversification and lower expenses. PVA does not believe however, that the fees and expenses charged by a fund should be the only criteria upon which a fund is evaluated. Depending upon a specific clients risk tolerance, objectives, time horizon and tax position, PVA may invest in individual equity securities on behalf of a client account.

Primarily through the use of SyntheticFi as a Sub-Advisor as outlined in Item 4, clients of PVA may have options bought and sold for them. The buying and selling of call options and put options may be used to accomplish several different investment goals; to buy equities, to sell equities and to limit potential loss on

investing in certain equities or sectors or to utilize strategies that use options as a source of short-to-medium term financing. Option activity may involve buying calls to be able to move into positions at lower risk of capital, or to leverage gains where growth in specific securities or sectors is expected; selling calls on long hold positions to gain additional income for the client account or to move out of a position at a price that may secure acceptable gains; selling puts when a position may want to be established at an acceptable price and add income to client accounts, and buying puts when a hedge against a drop in value of a long position is desired.

### **Asset Allocation**

In implementing our Clients' investment strategy, we begin by attempting to identify an appropriate ratio of equities, fixed income, and cash (i.e. "asset allocation") suitable to the Client's investment goals and risk tolerance. A risk of asset allocation is that the Client may not participate in sharp increases in a particular security, industry or market sector. Another risk is that the ratio of equities, fixed income, and cash will change over time due to stock and market movements and, if not corrected, will no longer be appropriate for the Client's goals. We attempt to closely monitor asset allocations and make changes periodically to keep in line with the target risk tolerance model.

### **Passive Investment Management**

Passive investing involves building portfolios that are composed of various distinct asset classes. The asset classes are weighted in a manner to achieve the 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.

### **Passive and Active Investment Management**

We may choose investment vehicles that are considered passive, active, or a combination of both styles.

Passive investing involves building portfolios that are composed 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.

Active investing 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. Actively managed funds are also designed to reduce volatility and risk.

We may engage in both passive and active investing in Client's portfolio. However, we strive to construct portfolios of funds and individual securities that we believe will have the greatest probability for achieving

our Clients' personal financial goals with the least amount of volatility and risk rather than attempt to outperform an arbitrary index or benchmark.

Specific investment selections are based on a number of factors that we evaluate in order to select, what we believe to be, the highest quality funds or individual securities for our Clients. These factors include but are not limited to underlying holdings of funds, percentage weighting of holdings within funds, liquidity, tax efficiency, bid/ask spreads, and other smart/strategic beta factors. These factors may or may not result in the lowest cost ETFs and mutual funds available when utilizing funds in a Client's portfolio, but we strive to keep internal fund expenses as low as possible.

## **INVESTMENT RISKS**

All securities investments carry risk, including the risk that an investor loses a part or all of his or her initial investment. Risk refers to the uncertainty that the actual return the investor realizes could differ from the expected return. Risks may be systematic, referring to factors that affect the returns on all comparable investments and that affect the market as a whole. Systematic risks include market risk, interest rate risk, reinvestment rate risk, purchasing power risk and exchange rate risk. Unsystematic risks depend on factors that are unique to the specific investment security. These risks include business risk and financial risk.

Here are some of the general risks associated with parts of our investment strategy:

**Short-term purchases** – on occasion, generally only for tax management purposes, we may determine to buy or sell securities in a client's account and hold them for less than a year. Some of the risks associated with short-term trading that could affect investment performance are increased commissions and transaction costs to the account and increased tax obligations on the gains in a security's value.

**Bond Pricing** – The price of bonds depends in part on the current rate of interest. Rising interest rates decrease the current price of bonds because current purchasers require a competitive yield. As such, decreasing interest rates increase the current value of bonds with associated decrease in bond yield. We may decide to exchange to a lower or higher duration bond or to another asset class due to interest rate risk that could affect investment performance.

**Inflation** - Inflation is the loss of purchasing power through a general rise in prices. If an investment portfolio is designed for current income with a real rate of return of 4% and inflation were to rise to 5% or higher, the account would result in a loss of purchasing power and create a negative real rate of return.

**Price Fluctuation** - Security prices do fluctuate (except for cash or cash equivalents) and clients must accept that risk associated with the fluctuations or change to a more appropriate investment portfolio in alignment with their risk tolerance.

**Reinvestment of Dividends** - An investor can choose to reinvest interest, dividends and capital gains to accumulate wealth. This is an appropriate strategy for a portfolio designed for capital growth. However, the reinvested earnings could result in a lower or a higher rate than was initially earned.

**Mutual Funds or ETF's with Foreign Asset Holdings** – Any investments in mutual funds that make foreign investments are subject to the uncertainty with changes in the foreign currency value. The client will bear more risk and possibly earn a substantially higher return or a substantially lower return.

Short Sale Trading – Short Sale Trading, or “shorting” involves a great amount of risk and is generally not advocated by PVA, nor is it a part of our core investment strategy. In rare cases, short selling may be used as directed by client to achieve specific goals. Additionally, for certain clients, through our sub-advisory relationship with OSAM, the Client and PVA may jointly agree that a long-short strategy may be utilized to achieve certain tax or financial outcomes.

Margin Risk & Trading – PVA does not generally advocate leverage as a part of its investment strategy. Margin is the act of borrowing money to enhance investment returns. Margin risk can include the following: You can lose more than deposited, the firm can force the sale of securities in your account, the firm can sell the securities without contacting you, and you are not entitled to an extension of time on a margin call. In rare cases, and generally only for short term financing considerations, clients may elect to assume a margin balance on their investment account. The client’s custodian will require a percentage of assets under management to be pledged as collateral for the margin amount. Clients risk that in a falling market, the pledged collateral will be insufficient to cover a margin call by the client’s custodian. Consequently, all margin decisions are left to the client. For certain clients, through our sub-advisory relationship with OSAM, the Client and PVA may jointly agree that a long-short strategy may be utilized which would utilize margin to achieve its objectives.

Option Trading – Certain PVA clients may engage in option trading. Option securities are complex derivatives of equity securities that incorporate certain leverage characteristics and as such carry an increased risk of investment loss. Selling call options without owning the underlying security could require the purchase of the same security in the open market to deliver and satisfy the contract. Selling put options could require the purchase of that security at the price stated in the option contract.

Liquidity Risk - Some investments have daily liquidity, however, some investments, particularly those related to alternative strategies in private markets, require lock-ups for months, quarters, or years (sometimes in excess of 10 years). These investments may not be redeemable or provide liquidity prior to the length of the fund commitment.

### **C. MATERIAL RISK OF VARIOUS SECURITY TYPES**

Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below (leaving aside Treasury Inflation Protected/Inflation Linked Bonds) are not guaranteed or insured by the FDIC or any other government agency.

Mutual Funds: Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. They can be of bond “fixed income” nature (lower risk) or stock “equity” nature (mentioned below).

Equities: Equity investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry market conditions and general economic environments.

Fixed Income/Bonds: Fixed income investments generally pay a return on a fixed schedule, though the amount of the payments can vary and include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best known type of fixed income security. In general, the

fixed income market is volatile, and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

Exchange Traded Funds (ETFs): An ETF is an investment fund traded on stock exchanges similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest, and the possibility of inadequate regulatory compliance. Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed “electronic shares” not physical metal) specifically may be negatively impacted by several unique factors, among them (1) large sales by the official sector which own a significant portion of aggregate world holdings in gold and other precious metals, (2) a significant increase in hedging activities by producers of gold or other precious metals, (3) a significant change in the attitude of speculators and investors. Prices may vary significantly from the Net Asset Value due to market conditions. Certain Exchange Traded Funds may not track underlying benchmarks as expected.

REIT's/Real-Estate Funds: REIT's and Real Estate Funds face several kinds of risk that are inherent in the real estate sector, which historically has experienced significant fluctuations and cycles in performance. Revenues and cash flows may be adversely affected by: changes in local real estate market conditions due to changes in national or local economic conditions or changes in local property market characteristics; competition from other properties offering the same or similar services; changes in interest rates and in the state of the debt and equity credit markets; the ongoing need for capital improvements; changes in real estate tax rates and other operating expenses; adverse changes in governmental rules and fiscal policies; adverse changes in zoning laws; the impact of present or future environmental legislation and compliance with environmental laws.

Foreign-Securities/ADR's: Non-U.S. securities present certain risks such as currency fluctuation, political and economic change, social unrest, changes in government regulation, differences in accounting and the lesser degree of accurate public information available.

Alternative Investments: Less traditional assets (sometimes called “alternative investments”) may help clients construct a long term portfolio--in combination with more traditional assets like stocks and bonds--that has higher expected returns and/or lower risk. This is because alternative investments, relative to a more traditional stock/bond portfolio, may have (a) higher expected returns, (b) lower expected risk, and/or (c) lower correlation to a stocks/bonds portfolio. Assets classes that may be utilized in client investment portfolios include, but are not limited to:

- (a) Commodities,
- (b) Currencies (which includes Cryptocurrencies),
- (c) Direct Lending,
- (d) Hedge Funds,
- (e) Precious Metals,
- (f) Private Equity,
- (g) Structured Products,
- (h) Systematic Investment Strategies,
- (i) Venture Capital, and/or
- (j) Volatility Investments.

Alternative Investments may be accessed in multiple ways, including, but not limited to, Direct Investment, Exchange Traded Funds, Mutual Funds, Pooled Investment Vehicles, Private Investment Funds, and/or Publicly-traded Derivatives (including Futures). Risks include, but are not limited to, concentration risk, credit/default risk, counterparty risk, high volatility and/or frequency changes in volatility, inflation, investor concentration, legal risk, limited markets, liquidity risk, long-term investment commitments, market risk, strategy risk, supply/demand constraints, turnover risk, and taxation risk. The taxation of Alternative Investments is also important, and may vary by factors such as investment holding period, asset class, and how the asset is accessed.

Use of Margin and Leverage: While the use of margin borrowing can substantially improve returns, such use may also increase the adverse impact to which a Client's portfolio may be subject. Borrowings will usually be from securities brokers and dealers and will typically be secured by the Client's securities and/or other assets. Under certain circumstances, such a broker-dealer may demand an increase in the collateral that secures the Client's obligations and if the client were unable to provide additional collateral, the broker-dealer could liquidate assets held in the account to satisfy the Client's obligations to the broker-dealer. You are not required to be notified before your securities are liquidated. Liquidation in that manner could have extremely adverse consequences. In addition, the amount of the client's borrowings and the interest rates on those borrowings, which will fluctuate, will have a significant effect on the Client's profitability. When using margin, you can lose more funds than you deposit into your account. A decline in the value of securities that are purchased on margin may require you to provide additional funds to the firm that has made the loan to avoid the forced sale of those securities or other securities in your account.

**Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

## Item 9: Disciplinary Information

- A. No criminal or civil action has ever been filed against PVA or its representatives.
- B. No administrative proceedings before any Agency or Authority has ever been initiated against PVA or its representatives.
- C. No Self-Regulatory Organization proceedings has ever been initiated against PVA or its representatives.

## Item 10: Other Financial Industry Activities & Affiliations

- A. Neither PVA nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer.
- B. Neither PVA nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.
- C. Neither PVA nor its representatives have any material relationships to this advisory business that would present a possible conflict of interest.
- D. PVA may, from time-to-time, utilize and select third-party investment advisers based on individual client needs. If a specific third-party investment adviser has particular expertise in an area that PVA and/or the client deems valuable, PVA may elect to utilize such adviser for services and may directly or indirectly receive or provide compensation for such a relationship. Any relationship will be disclosed to the client as well as the compensation arrangement. Any utilization of third-party

investment advisors may increase the total costs to the client as the third-party investment advisor may charge their own fees but will not increase any fees to PVA collected from that client.

- E. PVA offers Business Advisory Services (“BAS”) to certain organizations. The advisory work offered by PVA and its representative is consultative in nature and customers who choose to engage PVA for BAS sign a BAS Agreement that outlines the scope of services and terms of engagement. Clients who sign a BAS Agreement do not receive direct or personal investment advisory services or financial planning services. These clients are typically engaging PVA for advice in pursuit of acquisitions or strategic business or operational advice. Additionally, these clients may engage PVA for assistance in positioning for an eventual sale or merger of their business. PVA maintains no ownership stake or vested interest in the completion of any activity except for an agreed upon engagement fee as outlined in the BAS Agreement. If a representative of an organization under a BAS Agreement is also interested in personal IAS or FPS services, a separate agreement will be signed and disclosed to the BAS client. Any actual conflict of interest or perceived conflict of interest will be appropriately disclosed to the client under the BAS Agreement and the client under the IAS or FPS Agreement. PVA is registered as a Business Broker pursuant to the Illinois Business Brokers Act of 1995.

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

### **Code of Ethics**

PVA has a written Code of Ethics that covers the following areas: General Principles of PVA Financial LLC, Personal Trading Policies, Exemptions from Reporting Requirements, Non-Reportable Securities, Reporting Requirements, Restricted List, Principal Transactions, Private Placements, Initial Public Offerings, Manipulative Practices, Client Priority, Review of Personal Securities Transactions, Pre-Clearance for Personal Securities Transactions, Insider Trading, Prohibited Activities, Reporting of Material Non-Public Information, Penalties for Insider Trading, Sanctions and Annual Review. Our Code of Ethics is available free upon request to any client or prospective client.

### **Recommendations Involving Material Financial Interests**

PVA does not recommend that clients buy or sell any security in which a related person to PVA or PVA has a material financial interest.

### **Investing Personal Money in the Same Securities as Clients**

From time to time, representatives of PVA may buy or sell securities for themselves or their family that they also recommend to clients. This may provide an opportunity for representatives of PVA to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. PVA will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client’s disadvantage when similar securities are being bought or sold.

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

From time to time, representatives of PVA may buy or sell securities for themselves or their family at or around the same time as clients. This may provide an opportunity for representatives of PVA to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. Any such occurrences will be documented and, in order to address the conflict of interest, PVA will ensure its representatives do not engage in trading that operates to the client's disadvantage when similar securities are being bought or sold. We will not trade non-mutual fund securities prior to the same security for clients on the same day. Consistent with its fiduciary duty, PVA always acts in the best interest of the client, including in trading at or around the same time as client transactions.

## Item 12: Brokerage Practices

### **Factors Used to Select Custodians**

Advisor does not have any affiliation with any custodian we recommend. Specific custodian recommendations are made to the Client based on their need for such services. We recommend custodians based on the reputation and services provided by the firm.

In recommending custodians, we have an obligation to seek the "best execution" of transactions in Client accounts. The determinative factor in the analysis of best execution is not the lowest possible commission cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of the custodian's services. The factors we consider when evaluating a custodian for best execution include, without limitation, the custodian's:

- Combination of transaction execution services and asset custody services (generally without a separate fee for custody);
  - Capability to execute, clear, and settle trades (buy and sell securities for your account);
  - Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.);
  - Breadth of available investment products (stocks, bonds, mutual funds, exchange-traded funds (ETFs), etc.);
  - Availability of investment research and tools that assist us in making investment decisions
  - Quality of services;
  - Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate the prices;
- Reputation, financial strength, security and stability;  
Prior service to us and our clients.

### **Research & Other Soft-Dollar Benefits**

We do not have any soft-dollar arrangements with custodians whereby soft-dollar credits, used to purchase products and services, are earned directly in proportion to the amount of commissions paid by a Client. However, as a result of being on their institutional platform, Charles Schwab & Co., Inc. ("Schwab") may provide us with certain services that may benefit us.

Schwab Advisor Services™ is Schwab's business serving independent investment advisory firms like us. They provide our Clients and us with access to their institutional brokerage services (trading, custody, reporting and related services), many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help us manage or administer our Clients' accounts, while others help us manage and grow our business. Schwab's support services are

generally available on an unsolicited basis (we don't have to request them) and at no charge to us. The benefits received by Advisor or its personnel do not depend on the number of brokerage transactions directed to Schwab. As part of its fiduciary duties to Clients, Advisor at all times must put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits by Advisor or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the Advisor's choice of Schwab for custody and brokerage services. This conflict of interest is mitigated as Advisor regularly reviews the factors used to select custodians to ensure our recommendation is appropriate. Following is a more detailed description of Schwab's support services:

1. Services that benefit you. Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of Client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our Clients. Schwab's services described in this paragraph generally benefit you and your account.
2. Services that may not directly benefit you. Schwab also makes available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our Clients' accounts. They include investment research, both Schwab's own and that of third parties. We may use this research to service all or a substantial number of our Clients' accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:
  - provide access to Client account data (such as duplicate trade confirmations and account statements)
  - facilitate trade execution and allocate aggregated trade orders for multiple Client accounts
  - provide pricing and other market data
  - facilitate payment of our fees from our Clients' accounts
  - assist with back-office functions, recordkeeping, and Client reporting
3. Services that generally benefit only us. Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:
  - Educational conferences and events
  - Consulting on technology, compliance, legal, and business needs
  - Publications and conferences on practice management and business succession
4. Your brokerage and custody costs. For our Clients' accounts that Schwab maintains, Schwab generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab account. Certain trades (for example, many mutual funds and ETFs) may not incur Schwab commissions or transaction fees.

### **Brokerage for Client Referrals**

PVA receives no referrals from a custodian, broker-dealer or third party in exchange for using that custodian, broker-dealer or third party.

### **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 custodian to execute transactions. By

allowing Clients to choose a specific custodian, we may be unable to achieve the most favorable execution of Client transactions and this may cost Clients money over using a lower-cost custodian.

### **Aggregating (Block) Trading for Multiple Client Accounts**

Generally, we combine multiple orders for shares of the same securities purchased on the same trading day for advisory accounts we manage (this practice is commonly referred to as “block trading”). We will then distribute a portion of the shares to participating accounts in a fair and equitable manner. The distribution of the shares purchased is typically based on rebalancing needs but can also be proportionate to the size of the account, but it is not based on account performance or the amount or structure of management fees. Subject to our discretion, regarding particular circumstances and market conditions, when we combine orders, each participating account pays an average price per share for all transactions and pays a proportionate share of all transaction costs. Accounts owned by our firm or access persons may participate in block trading with your accounts; however, they will not be given preferential treatment.

Outside Managers 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**

### **A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews**

All client portfolio management accounts are reviewed at least annually only by Naveen Neerukonda, Managing Member with regard to clients’ respective investment policies and risk tolerance levels. All ongoing FPS are reviewed upon financial plan creation and plan delivery by Naveen Neerukonda, Managing Member. There is only one level of review for financial plans, and that is the review of client goals, savings habits, current assets, and investments (e.g., the primary drivers used when creating the original financial plan).

### **B. Factors That Will Trigger a Non-Periodic Review of Client Accounts**

IAS and FPS reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, marital status changes or inheritance). FPS reviews for hourly-billed clients will generally conclude upon delivery of the financial plan unless otherwise requested by the client.

### **C. Content and Frequency of Regular Reports Provided to Clients**

IAS clients will receive at a minimum annual written or verbal report detailing portfolio holdings of discretionary client accounts, tactical leanings across asset allocation, and our thinking behind those decisions. These reports and discussions will come from PVA and we urge clients to compare their custodial statements against any reports received from PVA.

FPS clients will receive the financial plan upon completion.

## Item 14: Client Referrals and Other Compensation

### **A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)**

PVA does not receive any economic benefit, directly or indirectly from any third party for advice rendered to PVA clients.

### **B. Compensation to Non-Advisory Personnel for Client Referrals**

PVA does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

## Item 15: Custody

When it deducts fees directly from client accounts at a selected custodian, PVA will be deemed to have limited custody of client's assets and must have written authorization from the client to do so. All account statements will come from the custodian; PVA does not provide these reports.

For client account(s) in which PVA directly debits its advisory fee:

- i. The custodian will send at least quarterly statements to the client showing all disbursements for the account(s), including the amount of the advisory fee.
- ii. The client will provide written authorization to PVA, permitting it to be paid directly from their account(s) held by the custodian.

PVA Financial LLC can establish standing letter of instructions or other similar asset transfer authorization arrangements ("SLOA") with qualified custodians in order for us to disburse funds to accounts as specifically designated by the client. With a SLOA a client can typically authorize first-party and/or third-party transfers. If transfers are third-party, PVA Financial LLC complies with each of the requirements and conditions enumerated below:

1. The client provides an instruction to the qualified custodian, in writing, that includes the client's signature, the third party's name, and either the third party's address or the third party's account number at a custodian to which the transfer should be directed.
2. The client authorizes PVA Financial LLC, in writing, either on the qualified custodian's form or separately, to direct transfers to the third party either on a specified schedule or from time to time.
3. The client's qualified custodian performs appropriate verification of the instruction, such as a signature review or other method to verify the client's authorization, and provides a transfer of funds notice to the client promptly after each transfer.
4. The client has the ability to terminate or change the instruction to the client's qualified custodian.
5. PVA Financial LLC has no authority or ability to designate or change the identity of the third party, the address, or any other information about the third party contained in the client's instruction.
6. PVA Financial LLC maintains records showing that the third party is not a related party of PVA Financial LLC or located at the same address as PVA Financial LLC.
7. The client's qualified custodian sends the client, in writing, an initial notice confirming the instruction and an annual notice reconfirming the instruction.

## Item 16: Investment Direction

PVA provides discretionary IAS and RPM to clients. For discretionary IAS and RPM, the client must execute limited power of attorney. The IAS Agreement established with each client outlines the discretionary authority for trading and discretion to select the broker-dealer to be used for the purchase or sale of securities for a client's account. Where investment discretion has been granted, PVA generally manages the client's account and makes investment decisions without consultation with the client as to what securities to buy or sell, when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, or the price per share. In some instances, PVA's discretionary authority in making these determinations may be limited by conditions imposed by a client (in investment guidelines or objectives, or client instructions otherwise provided to PVA).

For those client accounts where we provide non-discretionary IAS or RPC, we do not maintain discretion over client accounts with respect to securities to be bought and sold and the amount of securities to be bought and sold. This means we will require the client's direct authorization prior to making any changes to the client's account. The non-discretionary services will be outlined in the clients Agreement.

If our firm has engaged an Outside Manager to assist with the management of Client's portfolio, our firm has the discretion to direct the Outside Manager to buy or sell securities for Client's portfolio without obtaining prior Client approval for each transaction.

## Item 17: Voting Client Securities

PVA will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

## Item 18: Financial Information

### **A. Balance Sheet**

PVA neither requires nor solicits prepayment of more than \$1,200 in fees per client, six months or more in advance and therefore does not need to include a balance sheet with this brochure.

### **B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients**

Neither PVA nor its management has any financial condition that is likely to reasonably impair PVA's ability to meet contractual commitments to clients.

### **C. Bankruptcy Petitions in Previous Ten Years**

PVA has not been the subject of a bankruptcy petition in the last ten years.