

Is An Investment Advisory Account Right for you?

There are different ways you can get assistance with your investments. You should carefully consider which types of accounts and services are right for you.

Pure Portfolios Holdings LLC (“Pure Portfolios”) is registered with the Securities and Exchange Commission (SEC) as an investment adviser. This document gives you a summary of the types of services we provide and how you pay fees. Please ask us for additional information.

We provide advisory accounts and services rather than brokerage accounts and services. Brokerage and investment advisory services fees can differ, and it is important for you to understand these differences. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://www.investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisors, and investing.

Relationships and Services.

What Investment Services and Advice Can You Provide Me?

We offer investment advisory services to retail investors including investment management services, investment advisory services, financial planning, and consulting services.

If you retain our firm for investment management services, you will pay an on-going asset-based fee quarterly, in arrears, for our services based upon the market value of the assets being managed by the Firm on the last day of the previous billing period. We will meet with you in person if possible, otherwise by phone and/or computer to determine your investment objectives, risk tolerance, and other relevant information at the beginning of our advisory relationship. We will use this information to develop a strategy that enables our firm to give you continuous and focused investment advice and/or to make investments on your behalf. Once we construct an investment portfolio for you, we will monitor and rebalance your portfolio’s performance on an ongoing basis. If you participate in our discretionary investment management services, the authorization will allow us to manage your account regarding the purchase and/or sale of investments without your approval prior to each transaction until the termination of our agreement. You may limit our discretion by providing our firm with your restrictions and guidelines in writing.

Pure Portfolios also offers financial planning services which typically involve providing a variety of advisory services to clients regarding the management of their financial resources based upon an analysis of their individual needs. If you retain our firm for financial planning services, we will meet with you to gather information about your financial circumstances and objectives and make investment allocation recommendations based on your investment profile. You will be responsible for implementing our investment advice.

Pure Portfolios offers retirement consulting services to employee benefit plans and their fiduciaries based upon the needs of the plan and the services requested by the plan sponsor or named fiduciary. In general, these services may include an existing plan review and analysis, plan-level advice regarding fund selection and investment options, education services to plan participants, investment performance monitoring and/or ongoing consulting. These consulting services will generally be non-discretionary and advisory in nature, meaning you make the ultimate decision regarding the purchase and/or sale of investments.

We offer investment advisory services with a large selection of investments to individuals, trusts, estates, charitable organizations, corporations, and other business entities.

In general, we do not require a minimum to open and maintain an advisory account. **For additional information, please see Pure Portfolios’ ADV at www.adviserinfo.sec.gov (Part 2A brochure, items 4 and 7).**

Conversation Starters. Ask your financial professional –

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

Fees, Costs, Conflicts, and Standard of Conduct.

What Fees Will I Pay?

For investment Management Services, you will be charged an ongoing management fee based on the assets under management in accordance with the fee schedule presented in your agreement. Fees are typically charged *quarterly, in arrears* on the market value of the assets being managed by the Firm on the last day of the previous billing period. The asset-based fee reduces the value of your account and will be deducted from your account. Our current fee schedules are described in Item 5 of the Form ADV Part 2. **For additional information, please see Pure Portfolios’ ADV at www.adviserinfo.sec.gov (Part 2A brochure, item 5).**

Investment management clients pay either a flat fee or a tiered management fee ranging from 0.40% to 1.00% depending on the size and complexity of their investment account. Clients which are engaged with Pure Portfolios for Consultative Services pay a flat fee, or combination

of initial fee and hourly rate. At our discretion, we may combine the account values of family members living in the same household to determine the applicable advisory fee. Combining account values will increase your total assets under management, which may result in your paying a reduced advisory fee percentage. Although the effective management fee rate will decrease the larger your account, the total management fees you will pay will likely increase as you increase the total amount of assets under our management, and therefore we generally have an incentive to encourage transferring or depositing additional assets into your account.

Other fees and costs may include custodian fees and account maintenance fees. Some investments impose additional fees that will reduce the value of your investment over time. **You will pay fees and costs whether you make or lose money on your investments.**

Conversation Starters. Ask your financial professional –

- *Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?*

Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.

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

When we act as your investment adviser, we are held to a fiduciary standard that covers our entire investment advisory relationship with you. We act in your best interest and do not put our interest ahead of yours. Here are some examples to help you understand what this means:

- If your account value increases, and the fee percentage stays the same, your total fee may go up. Likewise, if your account value decreases, you may still pay a fee proportional to your assets under management. Because our advisory fee is based on your account value, we may be incentivized to increase your account value to increase the total fee paid.
- The custodians we use, or may use in the future, sometimes make available to firms other products and services that benefit our Firm, but may not directly benefit the client or its account. These products and services may assist us in managing and administering our clients' accounts.

At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here are some examples to help you understand what this means.

For additional information, please see Pure Portfolios' ADV at www.adviserinfo.sec.gov (Part 2A brochure, item 10).

Conversation Starters. Ask your financial professional –

- *How might your conflicts of interest affect me, and how will you address them?*

How do your financial professionals make money?

Our financial professionals are paid a salary plus discretionary bonuses based on company, team, and individual performance, which includes metrics like client retention and referrals. The employees' salaries are sourced from revenue the firm earns from the financial professional's advisory services or recommendations.

Disciplinary History

Do you or your financial professionals have a legal or disciplinary history?

No. Visit Investor.gov/CRS for a free and simple search tool to research us and our financial professionals.

Conversation Starters. Ask your financial professional –

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

Additional Information

For additional information about our services, including up-to-date information about the firm and/or a copy of this disclosure, please call Colin Purcell at (877) 261-0015. To report a problem to the SEC, visit Investor.gov or call the SEC's toll-free investor assistance line at (800) 732-0330. If you have a problem with your investments, investment account or a financial professional, you may contact us in writing at 1 Centerpointe Drive, Suite 120, Lake Oswego, OR 97035

Conversation Starters. Ask your financial professional –

- *Who is my primary contact person? Is he or she a representative of an investment adviser or broker dealer?*
- *Who can I talk to if I have concerns about how this person is treating me?*