



Form ADV

Part 2A

Paraklete Financial, Inc.

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This brochure (“Brochure”) provides information about the qualifications and business practices of Paraklete Financial, Inc. (“PFI”). You should review this Brochure in conjunction with our separate brochure supplement (“Supplement”). The Supplement(s) has been prepared for the purpose of providing information about the qualifications and background of the supervised person(s) working with you on our behalf or who may otherwise participate in the advisory services provided to you. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or by any state securities authority.

If you have any questions about the contents of this Brochure or our Supplement(s), please contact us at 678-290-3930 or ttillery@parakletefinancial.com. Additional information about PFI or any of our supervised persons (who are registered under our firm) is also available on the SEC’s Investment Adviser Public Disclosure (“IAPD”) which can be found at www.adviserinfo.sec.gov.

The format/layout of this Brochure has been dictated by the SEC. As such, the Brochure’s table of contents can be found after the “Material Changes” section of this Brochure, not at the beginning of the Brochure. The subsections appearing under each heading shall follow the mandated ordering of the items required to be addressed in this Brochure as set forth in the instructions and guidance issued by the SEC in regard to Part 2A of the Form ADV. PFI’s response to each such item shall immediately follow each numbered item. We encourage any reader of this Brochure to also refer to the SEC’s instructions and guidance related to Part 2A of the Form ADV. Throughout this Brochure, any references to “we,” “our,” “ours,” “us,” etc. are meant to refer to PFI.

II. Material Changes

Filing date of last annual ADV update: March 31, 2011.

On July 28, 2010, the SEC published Release No. IA-3060, titled, "Amendments to Form ADV" which announced the approval of the new amendments to Form ADV. This Brochure is a new document prepared according to the SEC's new requirements and rules and as set forth in the ADV and its corresponding instructions. As such, this Brochure is materially different in structure and requires certain new information that our previous client disclosure document (i.e. Part II and Schedule F) did not require. In the future, this Material Changes section will discuss only specific material changes that are made to the Brochure and will provide you with a summary of such changes.

Since the filing of our most recent annual ADV update and aside from that overall formatting/layout change described above, there have been no other material changes between our old Part II and Schedule F and this new Brochure.

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Key Definitions

There are several terms used throughout this Brochure that are defined in the Glossary of the Form ADV. The full Form ADV and its glossary can be found on the SEC's web site at <http://www.sec.gov/about/forms/formadv.pdf>, however, several of the more important terms that are used throughout this Brochure are provided below for your reference. The definitions appear below as they appear in the glossary of the ADV so be mindful that all references made to "you," "your," or "yours" are intended to refer to PFI. Each term is presented in alphabetical order, not necessarily its order of appearance or use in this Brochure.

Advisory Affiliate: Your advisory affiliates are (1) all of your officers, partners, or directors (or any person performing similar functions); (2) all persons directly or indirectly controlling or controlled by you; and (3) all of your current employees (other than employees performing only clerical, administrative, support or similar functions).

Control: Control means the power, directly or indirectly, to direct the management or policies of a person, whether through ownership of securities, by contract, or otherwise. Each of your firm's officers, partners, or directors exercising executive responsibility (or persons having similar status or functions) is presumed to control your firm. A person is presumed to control a corporation if the person: (i) directly or indirectly has the right to vote 25 percent or more of a class of the corporation's voting securities; or (ii) has the power to sell or direct the sale of 25 percent or more of a class of the corporation's voting securities. A person is presumed to control a partnership if the person has the right to receive upon dissolution, or has contributed, 25 percent or more of the capital of the partnership. A person is presumed to control a limited liability company ("LLC") if the person: (i) directly or indirectly has the right to vote 25 percent or more of a class of the interests of the LLC; (ii) has the right to receive upon dissolution, or has contributed, 25 percent or more of the capital of the LLC; or (iii) is an elected manager of the LLC. A person is presumed to control a trust if the person is a trustee or managing agent of the trust.

Management Persons: Anyone with the power to exercise, directly or indirectly, a controlling influence over your firm's management or policies, or to determine the general investment advice given to the clients of your firm. Generally, all of the following are management persons: Your firm's principal executive officers, such as your chief executive officer, chief financial officer, chief operations officer, chief legal officer, and chief compliance officer; your directors, general partners, or trustees; and other individuals with similar status or performing similar functions; The members of your firm's investment committee or group that determines general investment advice to be given to clients; and If your firm does not have an investment committee or group, the individuals who determine general investment advice provided to clients (if there are more than five people, you may limit your firm's response to their supervisors).

Person: A natural person (an individual) or a company. A company includes any partnership, corporation, trust, limited liability company ("LLC"), limited liability partnership ("LLP"), sole proprietorship, or other organization.

Related Person: Any advisory affiliate and any person that is under common control with your firm.

Self-Regulatory Organization or SRO: Any national securities or commodities exchange, registered securities association, or registered clearing agency. For example, the Chicago Board of Trade ("CBOT"), FINRA and New York Stock Exchange ("NYSE") are self-regulatory organizations.

Supervised Person: Any of your officers, partners, directors (or other persons occupying a similar status or performing similar functions), or employees, or any other person who provides investment advice on your behalf and is subject to your supervision or control.

IV. Advisory Business

Item IV.(A). PFI at a Glance

Firm Profile

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

Together the principals of the firm have over 50 years of experience in comprehensive financial planning, asset protection, estate planning, risk management, investments, philanthropy, and retirement and tax planning.

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

Years in Business

Date of formation: October 25, 2006.

Date of initial investment adviser registration: February 13, 2007.

Principal Owners

The following party(s) maintains at least 25% direct/indirect ownership in PFI.

- Susan Tillery, CPA/PFS, CFP[®], President/CEO
- Thomas Tillery, CFP[®], Vice President/CCO

IV.(B). PFI's Advisory Services

In this section, we will describe the services we offer as well as the fees that correspond to those services.

Product Type Limitations

We generally provide investment advice in relation to the following specific types of securities/investments.

<input checked="" type="checkbox"/>	Exchange listed equities	<input checked="" type="checkbox"/>	Mutual funds (closed-end and open-end funds)
<input checked="" type="checkbox"/>	Over the counter equities	<input checked="" type="checkbox"/>	Real Estate Investment Trusts ("REITs")
<input checked="" type="checkbox"/>	Equities of foreign issuers	<input checked="" type="checkbox"/>	Exchange traded funds
<input checked="" type="checkbox"/>	Interests in privately offered securities (hedge funds, venture capital funds, private equity funds, etc.) involving any of the following: <ul style="list-style-type: none"> • Real estate • Oil and gas • Mortgages or other receivables/assets • Other: 	<input checked="" type="checkbox"/>	U.S. government securities
<input checked="" type="checkbox"/>	Warrants	<input checked="" type="checkbox"/>	Options on securities
<input checked="" type="checkbox"/>	Corporate debt securities (other than commercial paper)	<input checked="" type="checkbox"/>	Options on commodities
<input checked="" type="checkbox"/>	Commercial paper	<input type="checkbox"/>	Options on futures
<input checked="" type="checkbox"/>	Certificates of deposit	<input type="checkbox"/>	Futures contracts (tangibles)
<input checked="" type="checkbox"/>	Municipal securities	<input type="checkbox"/>	Futures contracts (intangibles)
<input checked="" type="checkbox"/>	Variable life insurance	<input type="checkbox"/>	Other:
<input checked="" type="checkbox"/>	Variable annuities	<input type="checkbox"/>	Other:

Specialized Services

As designated below, we specialize in the following services. As applicable, a description of each such service is also included below.

- 1. Financial planning. Please refer to our Financial Planning service description below in Section IV.(B).
- 2. Quantitative analysis.
- 3. Market timing services.
- 4. Other:
- 5. None.

Our Services

Service:	<i>Financial Planning</i>
Service description:	<p>We may prepare a written 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) insurance; (4) investments; (5) retirement planning; and (6) estate planning.</p> <p>In order to determine a suitable course of action 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, investment objectives, consideration of your overall financial condition, income and tax status, personal and business assets, risk profile, and other factors unique to your particular circumstances.</p> <p>We will review your present financial situation and issue a written analysis and report of recommendations in accordance with your goals and objectives. This service may</p>

	<p>include an initial consultation and subsequent follow-up visits. The services provided in this regard may include but would not be limited to the following:</p> <ul style="list-style-type: none"> • Prepare an annual net worth statement; • Create a cash flow statement; • Review current investments and make recommendations thereon; • Review client’s most recent tax returns and provide tax planning advice or tax preparation services; • Review client’s life insurance and disability insurance and make recommendations thereon; • Review client’s estate plan and make recommendations thereon; • Complete a retirement analysis; and • Provide education planning advice. <p>Please be advised that a conflict exists between our interests and your interests; you are under no obligation to act upon the investment advice or recommendations we provide you; and if you elect to act on any of our recommendations, you are under no obligation to effect any transactions through us.</p>
<p>Use of discretion:</p>	<p>We do not possess or exercise investment discretion with respect to this service offering.</p>
<p>Service fees/collection:</p>	<p>For the service described above, we may charge fees in the following manner:</p> <p><input checked="" type="checkbox"/> Annual, flat/fixd fee. Our annual fee (flat/fixd) for our financial planning services ranges from \$6,000 to \$150,000.</p> <p>Adviser collects annual fees in three (3) separate installments. The first installment is calculated as fifty (50) percent of the total annual fee. The initial payment is due upon a client’s engagement of Adviser and an invoice is sent to client with their copy of the engagement letter. The second installment is calculated as twenty five (25) percent of the total annual fee. Adviser will issue an invoice for the second installment ninety (90) calendar days after the client’s initial engagement of Adviser. The third installment is calculated as twenty five (25) percent of the total annual fee. Adviser will issue an invoice for the third installment 210 calendar days after the client’s initial engagement of Adviser. After the first twelve (12) months’ worth of service, the annual fee is reassessed (as set forth below after the first twelve months) and ranges from \$2,000-\$150,000. The collection process will switch to a quarterly frequency, in advance and will continue on that basis unless the Agreement is terminated or otherwise amended. All fees are due within two (2) weeks of the date of delivery of the invoice to the client.</p> <p><input checked="" type="checkbox"/> Non-annual, flat/fixd fees. Our non-annual, flat/fixd 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 \$150 to \$650. We require fifty (50) percent of the total non-annual, flat/fixd fee up front and the balance upon project completion.</p> <p>All fees are negotiable at our sole discretion. Specific fee arrangements will be set forth in your service agreement (“Agreement”) with us.</p> <p>Lower fees for comparable services may be available from other sources, however, in light of the level and scope of service we offer and the qualifications and experience of our representatives, we believe our fees are not only reasonable but also competitive in relation to fees charged by other service providers.</p>

<p>Other fees:</p>	<p>In addition to our service fees, you may be assessed other fees by parties independent from us as part of the implementation of any investment transactions recommended under or as part of your financial plan. Relative to certain investment products (such as mutual funds), charges imposed directly at the investment product level (i.e. advisory fees, administrative fees, and other fund expenses.) Brokerage fees/commissions charged to you for securities trade executions may be billed to you by the broker-dealer or custodian of record for your account, not us. Any such fees are exclusive of, and in addition to our compensation. You will be solely and directly responsible for all fees, including fees other than those we may bill directly to you.</p> <p>Refer to Item V.(E) and Item 12 for additional information regarding other fees such as sales compensation, brokerage fees, custodial fees, etc.</p>
<p>Advanced billing and refunds:</p>	<p>The information below will address how we handle refunds for fees collected in advance.</p> <p><i>Annual, Flat/Fixed Fees</i></p> <p>In the event a client terminates the Agreement within seven (7) calendar days of having signed the Agreement, the client will be entitled to a prorated refund. Adviser's retained fee after the termination of an Agreement within the first seven calendar days will be equal to $(7/90 \times \text{initial installment})$. The amount refunded to the client will be equal to $(83/90 \times \text{initial installment})$. After the first seven calendar days, the entire first installment is deemed earned and therefore, non-refundable to the client. If the client terminates the Agreement more than seven calendar days after having signed it but not later than the ninetieth calendar day, Adviser will discontinue service and will not issue invoices for the remainder of the annual service fee installments. If the client terminates the Agreement after the ninetieth calendar day but before the 210th calendar day, Adviser 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 Adviser.</p> <p><i>Non-Annual, Flat/Fixed Fees</i></p> <p>In the event a client terminates the Agreement within three (3) calendar days of having signed the Agreement, the client will be entitled to a prorated refund. Adviser's minimum fee retained after the termination of an Agreement within the first three calendar days will be equal to $(3/\text{total \# of calendar days left in engagement} \times \text{initial installment})$. The amount refunded to the client will be equal to $((\text{total \# of calendar days in engagement} - 3)/\text{total \# of calendar days left in engagement} \times \text{initial installment})$. After the first three calendar days, the entire first installment is deemed earned and therefore, non-refundable to the client. If the client terminates the Agreement more than three calendar days after having signed it but not before project/service fulfillment, Adviser will discontinue service and will not issue an invoice for the remainder of the non-annual service fee installment. Fees received by Adviser after project/service completion are deemed fully earned and not subject to client refund. Specific fee arrangements will be set forth in your Agreement with us.</p>

IV.(C). Customization of Advisory Services

To the fullest extent possible, we will endeavor to tailor our advisory services to meet the specific needs of each and every client. In order to determine a suitable course of action for an individual client, we will perform a review of our clients' financial circumstances and other factors that may influence the investment recommendations we may make to you from time to time. Such review may include, but would not necessarily be limited to, investment

objectives, consideration of a client's overall financial condition, income and tax status, personal and business assets, risk profile, and other factors unique to a client's particular circumstances.

In making investment recommendations on behalf of a client, we will rely on a data gathering document or other questionnaire, which would be completed based on information provided by a client.

Our clients are free to impose any restrictions or other conditions with regard to how we provide our advisory services. If we agree to such restrictions and/or conditions, please be advised that restrictions and guidelines that you impose on our investment management functions may affect the composition and performance of custom portfolios (as a result, performance of custom portfolios within the same investment objective may differ and you should not expect that the performance of a custom portfolio will be identical to any other individual's portfolio performance) as well as any recommendations provided to you.

IV.(D). Wrap Fee Program Participation

None of our investment advisory services involve the use of wrap programs.

IV. (E). Assets Under Management¹ ("AUM")

AUM (discretionary):	\$ 0
AUM (non-discretionary):	\$ 0
Total AUM ² :	\$ 0
Date of AUM calculation:	N/A. PFI does not provide investment management services.

V. Fees and Compensation

V.(A). PFI Advisory Fees

Refer above to Item IV.(B).

V.(B). Fee Collection Process

Refer above to Item IV.(B).

V.(C). Other Fee/Expenses.

Refer above to Item IV.(B).

V.(D). Fees Charged in Advance

Refer above to Item IV.(B).

V.(E). Additional Compensation

Item V.(E) requires us to address situations in which we or any of our supervised persons accepts compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds. Neither we, nor any of our supervised persons are party to such arrangements.

¹ The term, "assets under management" shall carry the same meaning as that term is defined by Form ADV.

² Rounded to the nearest \$100,000

VI. Performance-Based Fees and Side-By-Side Management

We do not charge performance-based fees.

VII. Types of Clients

We will generally provide our services to the following types of clients.

- Individuals
- High net worth individuals
- Foundations / charitable organizations
- Trusts for natural persons
- Estates for natural persons
- Business or corporate entities

For information on any minimum fees, minimum initial/ongoing account balances, or other conditions we may impose, please refer to Item IV.(B).

VIII. Methods of Analysis, Investment Strategies and Risk of Loss

VIII.(A). Methods of Analysis

In the course of our management process and as appropriate on a case by case basis, we will employ some or all of the following methods of analysis. For a description of the risks related to each particular method of analysis, see the information following each analysis method description. A description of each key risk appears later in this section.

Charting / Technical –

The terms “charting” and “technical” analysis are generally used synonymously and therefore, for the purpose of this document, we will use the term, “technical analysis.” In most cases, technical analysis involves the evaluation of historical market data such as price and volume of a particular security or investment instrument. Technical analysis often times involves the use of charts, graphs, and other tools to evaluate historical factors relating to the investment instrument and perhaps the market as a whole. The goal of technical analysis is to try to identify historical trading patterns that suggest future trading activity or price targets.

Key risk(s): Economic Risk, Financial Risk, Inflation Risk, Interest Rate Risk, Legal/Regulatory Risk, Market Risk, Operational Risk, and Strategy Risk.

Fundamental

Fundamental analysis is generally the considered the opposite approach to technical analysis. Fundamental analysis involves the attempt to identify the intrinsic value (i.e. the actual, true/real value) of an investment instrument by examining any related economic, financial, and other quantitative/qualitative factors relevant to that instrument. Fundamental analysis can take into account anything that may impact the underlying value of the instrument. Examples of such things may include large-scale economic issues such as the overall condition or current cycle of the economy, industry-specific or sector-specific conditions, etc. Other company/issuer-specific factors may also be taken into consideration such as the company’s/issuer’s current financial condition, management experience and capabilities, legal/regulatory matters, the overall type and volume of current and expected business, etc.

One of the goals of fundamental analysis is to attempt to derive a value that can be compared to the current market price for a particular financial instrument in hopes of determining whether the instrument is overpriced (time to sell) or underpriced (time to buy).

Key risk(s): Economic Risk, Financial Risk, Inflation Risk, and Interest Rate Risk.

Cyclical

Cyclical analysis involves the evaluation of an investment instrument or perhaps its issuer for the purpose of identifying whether (and if so, to what extent) it/they may be impacted by fluctuations in the overall economic conditions throughout time. As an example, as more and more people lose their jobs, broad industries like housing or the automotive industries can be negatively impacted because consumers are less able to purchase things like homes and automobiles.

Key risk(s): Capital Risk, Economic Risk, Financial Risk, and Inflation Risk.

Investing in securities or other investment products involves the risk of loss and you should be prepared to bear such losses.

VIII.(A). (cont.) Investment Strategies

In the course of our management process and as appropriate on a case by case basis, we will employ any of the following investment strategies. For a description of the risks related to each particular investment strategy, see the information following each strategy description. The codes used below relate to risks described further below in this section.

Long-Term Purchases

Long-term purchases generally involve the acquisition of an investment instrument and holding it for a period of at least one year.

Key risk(s): Capital Risk, Economic Risk, Financial Risk, Inflation Risk, Interest Rate Risk, Legal/Regulatory Risk, Liquidity Risk, Market Risk, Operational Risk, Strategy Risk.

Investing in securities or other investment products involves the risk of loss and you should be prepared to bear such losses.

VIII.(B). Risk Disclosures

Capital Risk

Capital risk is one of the most basic, fundamental risks of investing; it is the risk that you may lose 100 percent of your money. All investments carry some form of risk and the loss of capital is generally a risk for any investment instrument.

Credit Risk

Credit risk can be a factor in situations where an investment's performance relies on a borrower's repayment of borrowed funds. With credit risk, an investor can experience a loss or unfavorable performance if a borrower does not repay the borrowed funds as expected or required. Investment holdings that involve forms of indebtedness (i.e. borrowed funds) are subject to credit risk.

Currency Risk

Fluctuations in the value of the currency in which your investment is denominated may affect the value of your investment and thus, your investment may be worth more or less in the future. All currency is subject to swings in valuation and thus, regardless of the currency denomination of any particular investment you own, currency risk is a realistic risk measure. That said, currency risk is generally a much larger factor for investment instruments denominated in currencies other than the most widely used currencies (U.S. dollar, British pound, Euro, Japanese yen, etc.).

Economic Risk

The prevailing economic environment is important to the health of all businesses. Some companies, however, are more sensitive to changes in the domestic or global economy than others. These types of companies are often referred to as cyclical businesses. Countries in which a large portion of businesses are in cyclical industries are thus also very economically sensitive and carry a higher amount of economic risk. If an investment is issued by a party located in a country that experiences wide swings from an economic standpoint or in situations where certain elements of an investment instrument are hinged on dealings in such countries, the investment instrument will generally be subject to a higher level of economic risk.

Financial Risk

Financial risk is represented by internal disruptions within an investment or the issuer of an investment that can lead to unfavorable performance of the investment. Examples of financial risk can be found in cases like Enron or many of the dot com companies that were caught up in a period of extraordinary market valuations that were not based on solid financial footings of the companies.

Higher Trading Costs

For any investment instrument or strategy that involves active or frequent trading, you may experience larger than usual transaction-related costs. Higher transaction-related costs can negatively affect overall investment performance.

Inflation Risk

Inflation risk involves the concern that in the future, your investment or proceeds from your investment will not be worth what they are today. Throughout time, the prices of resources and end-user products generally increase and thus, the same general goods and products today will likely be more expensive in the future. The longer an investment is held, the greater the chance that the proceeds from that investment will be worth less in the future than what they are today. Said another way, a dollar tomorrow will likely get you less than what it can today.

Interest Rate Risk

Certain investments involve the payment of a fixed or variable rate of interest to the investment holder. Once an investor has acquired or has acquired the rights to an investment that pays a particular rate (fixed or variable) of interest, changes in overall interest rates in the market will affect the value of the interest-paying investment(s) they hold. In general, changes in prevailing interest rates in the market will have an inverse relationship to the value of existing, interest paying investments. In other words, as interest rates move up, the value of an instrument paying a particular rate (fixed or variable) of interest will go down. The reverse is generally true as well.

Legal/Regulatory Risk

Certain investments or the issuers of investments may be affected by changes in state or federal laws or in the prevailing regulatory framework under which the investment instrument or its issuer is regulated. Changes in the regulatory environment or tax laws can affect the performance of certain investments or issuers of those investments and thus, can have a negative impact on the overall performance of such investments.

Liquidity Risk

Certain assets may not be readily converted into cash or may have a very limited market in which they trade. Thus, you may experience the risk that your investment or assets within your investment may not be able to be liquidated quickly, thus, extending the period of time by which you may receive the proceeds from your investment. Liquidity risk can also result in unfavorable pricing when exiting (i.e. not being able to quickly get out of an investment before the price drops significantly) a particular investment and therefore, can have a negative impact on investment returns.

Market Risk

The market value of an investment will fluctuate as a result of the occurrence of the natural economic forces of supply and demand on that investment, its particular industry or sector, or the market as a whole. Market risk may affect a single issuer, industry or sector of the economy or may affect the market as a whole. Market risk can affect any investment instrument or the underlying assets or other instruments held by or traded within that investment instrument.

Operational Risk

Operational risk can be experienced when an issuer of an investment product is unable to carry out the business it has planned to execute. Operational risk can be experienced as a result of human failure, operational inefficiencies, system failures, or the failure of other processes critical to the business operations of the issuer or counter party to the investment.

Past Performance

Charting and technical analysis are often used interchangeably. Technical analysis generally attempts to forecast an investment's future potential by analyzing its past performance and other related statistics. In particular, technical analysis often times involves an evaluation of historical pricing and volume of a particular security for the purpose of forecasting where future price and volume figures may go. As with any investment analysis method, technical analysis runs the risk of not knowing the future and thus, investors should realize that even the most diligent and thorough technical analysis cannot predict or guarantee the future performance of any particular investment instrument or issuer thereof.

Strategy Risk

There is no guarantee that the investment strategies discussed herein will work under all market conditions and each investor should evaluate his/her ability to maintain any investment he/she is considering in light of his/her own investment time horizon. Investments are subject to risk, including possible loss of principal.

VIII.(C). Investment-Specific Risks

There is no single type of investment instrument that we predominantly recommend, however, please be mindful that all investments carry some form and degree of risk. Certain types of investments carry greater types and levels of risk than others and you should make sure that you fully understand not only the investment product itself but also the attendant risk factors associated with such products.

IX. Disciplinary Information

The purpose of this section is for us to disclose to you any legal, disciplinary, or other events that you may consider material in your evaluation of our firm or the integrity of our management. Following each of the items below, we shall provide details as to each applicable matter or we will answer "No." This information is presented in a question and answer format. The time period required to be covered by our answers in this section is ten years from the date of the events requiring disclosure.

IX.(A). Criminal or Civil Action

In any domestic, foreign, or military court of competent jurisdiction, has PFI or any of its management persons...		
Been convicted of, or pled guilty or nolo contendere ("no contest") to (a) any felony; (b) a misdemeanor that involved investments or an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Been identified as the named subject of a pending criminal proceeding that involves an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Been found to have been involved in a violation of an investment-related statute or regulation; or	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Been the subject of any order, judgment, or decree permanently or temporarily enjoining, or otherwise limiting, your firm or a management person from engaging in any investment-related	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

activity, or from violating any investment-related statute, rule, or order?		
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IX.(B). Administrative Proceedings

Has PFI or any of its management persons been the subject of an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which PFI or any of its management persons...		
Was found to have caused an investment-related business to lose its authorization to do business; or	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Was found to have been involved in a violation of an investment-related statute or regulation and was the subject of an order by the agency or authority...		
denying, suspending, or revoking the authorization of PFI or one of its management persons to act in an investment-related business;	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
barring or suspending PFI or one of its management person's association with an investment-related business;	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
otherwise significantly limiting PFI or one of its management person's investment-related activities; or	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
imposing a civil money penalty of more than \$2,500 on PFI or one of its management persons?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

IX.(C). SRO Proceedings

Has PFI or any of its management persons been involved in a SRO proceeding in which PFI or any of its management persons ...		
Was found to have caused an investment-related business to lose its authorization to do business; or	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Was found to have been involved in a violation of the SRO's rules and was: (i) barred or suspended from membership or from association with other members, or was expelled from membership; (ii) otherwise significantly limited from investment-related activities; or (iii) fined more than \$2,500?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

X. Other Financial Industry Activities and Affiliations

The following information will address any active or pending financial industry affiliations that you need to know about for the purpose of identifying any related conflicts of interest that you might consider material in regard to letting us handle your investment advisory needs.

X.(A). Broker-Dealers

Neither PFI nor any of its management persons is registered as a broker-dealer nor do either parties have an application pending or otherwise in process for the purpose of seeking registration as a broker-dealer. Further, none of our management persons are registered as or currently seeking registration as a registered representative of a broker-dealer.

X.(B). Futures Commission Merchants, Introducing Brokers, Commodity Trading Advisors, Commodity Pool Operators

Neither PFI nor any of its management persons is registered as a futures commission merchant, an introducing broker, a commodity trading adviser, or a commodity pool operator, nor do either parties have an application pending or otherwise in process for the purpose of seeking registration as any of these types of firms. Further, none

of our management persons are registered as or currently seeking registration as associated persons of any of these types of firms.

X.(C). Related Persons

The purpose of this section is to address any relationship or arrangement (that is material to (1) our advisory business or (2) our clients) that we or any of our management persons have with any of our related persons that meet certain categories as identified by the Form ADV. Those categories are listed below and in the event that we have a related person that is included in one of those categories, we will address not only the relationship or arrangement that is material to our advisory business or our clients but also any conflict(s) arising out of this relationship/arrangement and how we address such conflict(s). It should be understood that if the checkbox immediately preceding a category is unselected, that category shall be deemed not applicable for the purpose of this item X.(C).

- Broker-dealer, municipal securities dealer, or government securities dealer or broker**
- Investment Company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or “hedge fund,” and offshore fund)**
- Other investment adviser or financial planner**
- Futures commission merchant, introducing broker, commodity pool operator, or commodity trading advisor**
- Banking or thrift institution**
- Accountant or accounting firm**
- Lawyer or law firm**
- Insurance company or agency**
- Pension consultant**
- Real estate broker or dealer**
- Sponsor or syndicator of limited partnerships**

X.(D) Use of Other Investment Advisers

We do not use other investment advisers in the course of the services described above in Item IV.(B).

XI. Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

XI.A 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
- The addressing of conflicts of interest
- Employee disclosure and reporting of personal securities holdings and transactions
- The firm's IPO and private placement policy
- The reporting of violations of the Code
- Educating employees about the Code
- Enforcement of the Code

Each of our representatives 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. A copy of our Code is available to all current and/or prospective clients upon request.

XI.(B) Participation in Client Trading

The information in this item is intended to address situations in which we or one of our related persons may have a material financial interest in the investment instruments we may recommend to you. No such arrangements exist.

XI.(C) Trading Alongside Our Clients

Neither we nor any of our related persons invests in the same securities that we recommend to our clients.

XI.(D) Trading Around the Same Time as Clients

Neither we nor any of our related persons invests in the same securities that we recommend to our clients.

XII. Brokerage Practices

The purpose of this Item is to present to you the factors that we take into consideration when (1) selecting or recommending broker-dealers to you for the purpose of effecting transactions on your behalf and (2) for determining the reasonableness of such broker-dealers' compensation related to such transactions.

PFI receives client referrals from financial institutions, such as broker-dealers and other investment advisers. For all referred clients, PFI may recommend that the referring broker-dealer, investment adviser, or other institution, with which the client already had an established relationship, be utilized to effect any securities transactions that are a part of the financial plan prepared by PFI. PFI does not effect or arrange for the effecting of any such securities transactions for its clients.

XII.(A).(1). Research and Soft Dollar Benefits

Soft dollar benefits are items such as research or other products or services (other than the typical execution and other brokerage services available to all other investment advisers) that an investment adviser may receive from a broker-dealer(s) or other party in connection with the client securities transactions are directed to that particular broker-dealer(s). We do not participate in any soft dollar arrangements.

XII.(A).(2). Brokerage for Client Referrals

In certain circumstances, firms like ours may receive client referrals as a result of recommending particular broker-dealers or other service providers. We, however, do not participate in any formal arrangements wherein we receive client referrals from any particular broker-dealer in return for selecting or recommending such broker-dealer.

XII.(A).(3). Directed Brokerage

We do not engage in specific securities trading activities on behalf of our clients, therefore this section does not apply to us.

XII.(B). Order Batching

We do not effect or arrange for the effecting of any such securities transactions for its clients, therefore, we do not engage in order batching.

XIII. Review of Accounts

XIII.(A). Review of Accounts or Financial Plans

We do not manage brokerage accounts, therefore, we do not review your brokerage accounts on an ongoing basis other than as part of our financial planning services. Following the delivery of the client's financial plan and/or investment policy statement, PFI will follow up with the various parties involved (broker-dealers, investment advisers, attorneys, etc.) to ensure the complete implementation of the plan. Beyond that, there is no ongoing account review process that will be carried out by PFI. Unless specifically engaged to do so, we do not periodically review financial plans for inactive clients. In such cases, the anticipated reviewer will be Mr. Thomas N. Tillery, VP/CCO.

XIII.(B). Non-Periodic Account Reviews

Not applicable; see XIII.(A).

XIII.(C). Reports to Clients

Account statements will be provided no less frequently than quarterly by the custodian, not by us. Account statements will identify account positions, balances, and transaction details.

XIV. Client Referrals and Other Compensation

XIV.(A). Compensation we Receive

Other than the compensation arrangements described above in Item IV.(B), PFI does not receive any other compensation in connection with the investment advisory services provided to our clients.

XIV.(B). Compensation we Pay

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

XV. Custody

We do not have custody of any client funds or securities.

XVI. Investment Discretion

In connection with our investment advisory services, we will not exercise discretionary authority.

XVII. Voting Client Securities

XVII.(A). Proxy Voting

Proxy Voting Policies and Procedures and Client Instruction

We do not vote proxies on behalf of any securities you own.

XVII.(B). Proxy Voting

Since you have not authorized us to vote proxies on your behalf, we will not do so. Proxies related to the securities you own will be disseminated as dictated by the issuer, transfer agent, or as otherwise set forth in the account opening paperwork you completed for the custodian holding your account/assets. If you have questions related to a particular proxy notice, please call us at 678-290-3930.

XVIII. Financial Information

XVIII.(A). Balance Sheet

We do not require or solicit prepayment of more than \$500 in fees per client, six months or more in advance. As a result, we are not required to provide our clients with a copy of our balance sheet from our most recently completed fiscal year.

XVIII.(B). Adverse Financial condition

In the event that we have discretionary authority or custody of any of our clients' assets or if we require or solicit prepayment of more than \$500 in fees per client, six months or more in advance, we are required to disclose any financial condition that is reasonably likely to impair our ability to meet contractual commitments with our clients. No such conditions exist.

XVIII.(C). Bankruptcy-Related Matters

PFI has never been the subject of a bankruptcy petition.

XIX. Requirements for State-Registered Advisers

XIX.(A). Control Persons

The following individuals represent our principal executive officers or management persons. You will also find in the information below, the formal educational and background for each of these persons.

Name:	Susan M. Tillery, CPA/PFS, CFP®	
Year of Birth:	1958	
Formal education after high school.		
Institution	Degree / Major	Date(s)
University of Georgia	BBA / Accounting	1976 - 1980
University of Georgia	MAcc	1980 - 1981
Business background for the preceding five years.		
Entity	Position Held	Date(s)

Paraklete Financial, Inc.	President	03/2007 - present
Harris myCFO, Inc.	Principal	01/2004 – 03/2007

Name:	Thomas N. Tillery, CFP®	
Year of Birth:	1958	
Formal education after high school.		
Institution	Degree / Major	Date(s)
The American College	MS, Financial Services	1995 - 1999
The Southern Baptist Theological Seminary	MA, Christian Education	1981- 1984
Columbus State University	BA, English Literature	1975 - 1981
Business background for the preceding five years.		
Entity	Position Held	Date(s)
Paraklete Financial, Inc.	Vice President	10/2006 - present
Ken Zahn, Inc.	Instructor	10/2006 – 12/2009
FINRA	Arbitrator	09/2006 - present
University of Georgia, Terry College of Business	Instructor	10/2006 - present

XIX.(B). Non-Investment Advisory Activities

In addition to the investment advisory services we offer as we have described in this Brochure, we offer the following services.

	Business Activity	Approximate Hours Per Month Spent on this Activity
<input checked="" type="checkbox"/>	None	
<input type="checkbox"/>	Brokerage services related to securities	
<input type="checkbox"/>	Brokerage or advisory services related to insurance	
<input type="checkbox"/>	Brokerage or advisory services related to futures or commodities	
<input type="checkbox"/>	Banking services	
<input type="checkbox"/>	Accounting or bookkeeping services	
<input type="checkbox"/>	Legal services	
<input type="checkbox"/>	Real estate-related services	

XIX.(C). Performance-Based Fees

We do not charge performance-based fees.

XIX.(D). Management Persons – Other Disclosures

XIX.(D).(1). Arbitration(s)

None of our management persons have been involved in an award or otherwise to have been found liable in an arbitration claim alleging damages in excess of \$2,500 involving any of the following matters.

- An investment or an investment-related business or activity;
- Fraud, false statement(s), or omissions;
- Theft, embezzlement, or other wrongful taking of property;
- Bribery, forgery, counterfeiting, or extortion; or

- Dishonest, unfair, or unethical practices.

XIX.(D).(2). Civil, SRO, or Administrative Proceeding(s)

None of our management persons have been involved in an award or otherwise to have been found liable in a civil, SRO, or administrative proceeding involving any of the following matters.

- An investment or an investment-related business or activity;
- Fraud, false statement(s), or omissions;
- Theft, embezzlement, or other wrongful taking of property;
- Bribery, forgery, counterfeiting, or extortion; or
- Dishonest, unfair, or unethical practices.

XIX.(E). Relationship Between Management Persons and Issuers

Other than that which we have already described in Item 10.(C)., there are no additional relationships or arrangements between our management persons and any issuer(s) of securities.