



Redeployment  
Wealth Strategies

# Form ADV Part 2A

## *“The Brochure”*

August 23, 2018

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*Redeployment Wealth Strategies, LLC*

Registered Investment Advisor

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*This brochure provides information about the qualifications and business practices of Redeployment Wealth Strategies, LLC. If you have any questions about the contents of this brochure, please contact us. 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 Redeployment Wealth Strategies, LLC is also available on the SEC’s website: [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).*

*Redeployment Wealth Strategies, LLC is a registered investment advisor with the Virginia State Corporation Commission. Registration does not imply any level of skill has been verified or endorsed by the Commonwealth of Virginia.*

## Item 2: Material Changes from Previous Versions of This Document

This revision encompasses numerous changes. PIM Financial Partners, LLC has formally changed its name to Redeployment Wealth Strategies, LLC. Redeployment Wealth Strategies is a multi-member LLC operating as a partnership. With the change in business structure comes a change in the fee structure, as well as modifications to the service offerings. This amendment only discusses material changes since the last annual update of the brochure on March 28, 2018.

Redeployment Wealth Strategies, LLC may update this document at any time. A copy of the updated brochure or a summary of material changes to the brochure will be sent to clients or made available in electronic form. Clients are also able to download this brochure from the SEC's Website: [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) or may contact redeployment Wealth Strategies at (757) 752-8055 to request a copy at any time.

**Clients and prospective clients are encouraged to review this brochure in its entirety and are encouraged to ask questions at any time prior to or throughout their engagement with Redeployment Wealth Strategies, LLC.**

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**Note: Redeployment Wealth Strategies, LLC will also be referred to throughout this document as simply “Redeployment Wealth Strategies” and “RWS”. The managing members of Redeployment Wealth Strategies, LLC are Paul D. Allen and Sean C. Gillespie.**

#### Item 4: Advisory Business

##### Description of the Firm

Domiciled in Virginia, Redeployment Wealth Strategies LLC was originally launched in April, 2015 as a Single-Member Limited Liability Company named PIM Financial Partners. RWS restructured to become a multi-member LLC operating as a partnership in the Commonwealth of Virginia in July 2018. RWS and its associates may in the future register, become licensed, or meet certain exemptions to registration and/or licensing in other jurisdictions in which RWS intends to conduct investment advisory business.

Paul D. Allen and Sean C. Gillespie are the managing members of Redeployment Wealth Strategies LLC. Their partnership agreement specifies they each hold equal equity in and authority over RWS. Additional information about Mr. Allen and Mr. Gillespie can be found at the end of this brochure. There are no other members or partners in RWS.

##### Description of Advisory Services Offered

Redeployment Wealth Strategies provides financial planning and investment management services to individuals, including high net worth individuals. RWS may also provide advice to employer-sponsored retirement plans.

RWS believes in a comprehensive approach to financial planning and investment management. Complete information is necessary to derive the best portfolio solution. To that end, investment management services are only available to clients after a complete financial plan including investment objectives, an investment policy statement, risk mitigation, estate/continuity planning, and tax planning has been developed.

Should you wish to engage RWS for its services, you must first execute our client service agreement. Clients are required to provide copies of (or information from) the following documents within 45 days of signing a client service agreement:

- Wills, codicils and trusts
- Insurance policies
- Mortgage information
- Tax returns
- Current financial specifics including W-2s, 1099s and/or pay stubs
- Information on current retirement plans and benefits provided by your employer
- Statements reflecting current investments in retirement and non-retirement accounts
- Employment or other business agreements you may have in place
- Completed risk profile questionnaires or other forms provided by our firm

RWS's ability to provide advisory services for a reasonable fee depends on access to accurate client financial information. RWS may, but is not obligated to, verify the information you have provided which will then be used in the financial planning or investment advisory process. In addition, it is necessary you provide RWS with an adequate level of information and supporting documentation throughout the term of the engagement, including, but not limited to: source of funds, income levels, and an account holder or their legal agent's authority to act on behalf of the account, among other information.

#### **Financial Planning Services:**

RWS uses a tiered approach to financial planning services. Specific client services are determined based on the annual fee the client is paying. If a client's calculated fee (discussed later) does not deliver all the services they want, the client has the option to increase the fee to a higher service tier.

#### **The Wealth Builder Package Includes**

- Establishment of Financial Goals
- Budgeting & Cash Flow Analysis
- Net Worth Analysis
- Retirement Planning
- College Planning
- Basic Estate Planning
- Limited Access to Online Tools
- Credit Score/Credit Report Analysis
- Widow/Widower Transition Assistance
- Military Pension Analysis & Planning
- Financial Education
- Tax Planning
- 50% Discount of Individual Tax Preparation

- 50% Discount on Proactive Tax Service
- 50% Discount on Tax Representation Service
- Life Insurance Analysis
- Disability Insurance Analysis
- Property & Casualty Insurance Analysis
- Investment Management

The **Wealth Manager** Package Includes Everything in the Wealth Builder Package plus:

- Full Access to Portal Tools
- Aging Parent Care Planning
- Inheritance / Lump Sum Planning
- Marriage & Divorce Planning
- Special Needs Planning
- Free Individual Tax Preparation
- Free Individual Tax Preparation for Dependents
- Proactive Tax Service
- Tax Representation up to Appeals
- Gift & Transfer Tax Return Preparation

The **Legacy Planner** Package Includes Everything in the Wealth Manager Package plus:

- Advanced Estate Planning
- Estate Tax Preparation
- Trust Tax Preparation
- Partnership Tax Return Preparation
- S-Corp Tax Return Preparation
- Advanced Tax Strategies

A Note on Investment Management:

Redeployment Wealth Strategies is proud to be a **Fee-only Fiduciary Financial Planning firm**. RWS strongly believes the source of a financial adviser's compensation influences the quality of advice s/he provides to clients. To remove the possibility of conflicting interests RWS will not accept compensation or commissions of any kind from other financial service companies. Likewise, RWS will not accept referral fees from insurance providers or attorneys. By receiving compensation exclusively from clients, RWS is better able to maintain its fiduciary standard of client care in all phases of financial plan development and implementation.

RWS believes the most rational approach to investing involves the use of proven strategies to improve portfolio performance. These strategies focus on the following:

- Optimizing the use of tax-advantaged accounts
- Asset allocation that meets the client's investment objectives and risk profile
- Reducing risk using strategic allocations of broad index funds
- Reducing costs using lowest cost funds
- Passively investing while remaining focused on long-term goals
- Rebalancing periodically, as required (or when investment objectives change)
- Being tax-efficient in accounts lacking other tax advantages

A process of interviews and questionnaires is used to tailor investment advice and develop an Investment Policy Statement for each client. The Investment Policy Statement will be used to guide portfolio management decisions. Clients may alter the Investment Policy Statement or direct Redeployment Wealth Strategies to temporarily deviate from the Investment Policy Statement at any time.

Once RWS and the client agree on the asset allocation strategy to be used, RWS will provide ongoing monitoring of the client account and may periodically recommend rebalancing to the target allocation or an adjustment to allocation (reallocation) based on changes in the client's life impacting investment goals and/or appropriate allocation (i.e. births, deaths, job changes, marriage, divorce, aging, etc.)

RWS manages investment accounts on a *non-discretionary* basis. This means RWS must seek client authorization prior to making changes to the client's investment account.

RWS does not manage client assets on a discretionary basis. Client approval will always be obtained prior to new purchases, reallocation, tax loss harvesting, and/or rebalancing of the investments in a client's account.

#### Client-Tailored Services and Client-Imposed Restrictions

A comprehensive plan is an endeavor that requires detail, and certain variables can affect the time involved in the development of the plan, to include: the quality of your own records, complexity and number of current investments, diversity of insurance products and employee benefits you currently hold, size of the potential estate, special needs of the client or their dependents, among others. While certain broad-based plans may require 10 or more hours to complete, complex plans may require more than 20 hours.

RWS will also account for any reasonable restrictions you may require for the management of your investment account(s). Please note that it will remain your responsibility to promptly notify RWS if there is any change in your financial situation and/or investment objectives for the purpose of reviewing, evaluating, or revising previous account restrictions or investment recommendations.

You will receive a summary of recommendations, offered guidance on the implementation of some or all of them, as well as an offer for periodic reviews thereafter. In all instances involving financial planning services, you will retain full discretion over all implementation decisions and are free to accept or reject any recommendation.

#### Wrap Fee Programs

RWS does not sponsor or serve as a portfolio manager in an investment program involving wrapped fees.

#### Client Assets Under Management

RWS manages client assets on a non-discretionary basis. As of 01 July 2018 RWS held approximately \$25,000 of client assets under management.

#### General Information

RWS does not provide legal or accounting related services or advice, but with your prior written consent we will work with your accountant or legal counsel to assist with the coordination and implementation of accepted strategies. You should be aware that these other professionals will charge you separately for their services and these fees will be in addition to RWS's fees.

We will use our best judgment and good faith effort in rendering advisory services to you. However, we cannot warrant or guarantee any particular level of account performance, that your account will be profitable over time, or that some or all of your planning goals will be met. Past performance is not necessarily indicative of future results.

Except as may otherwise be provided by law, RWS will not be liable to the client, heirs, or assignees for any loss an account may suffer by reason of an investment decision made or other action taken or omitted in good faith by RWS with that degree of care, skill, prudence and diligence under the circumstances that a prudent person acting in a fiduciary capacity would use; any loss arising from adherence to your direction or your attorney-in-fact may provide; any act or failure to act by a service provider maintaining your investment account. Federal and state securities laws impose liabilities under certain circumstances on persons who act in good faith and, therefore, nothing contained in this document shall constitute a waiver of any rights that you may have under federal and state securities laws.

Item 5: Fees and Compensation

For ongoing continuous investment management, advice and planning, RWS charges an annual level fee, billed in arrears in equal monthly installments, based on the client’s modified net worth (MNW).

RWS calculates MNW as follows:

$$\text{MNW} = (\text{Client Assets}) - (\text{Client Liabilities without Student Loans}) - (\text{Primary Residence Equity } \leq \$100,000) - (\text{Student Loan Debt } \leq \$100,000) - (\text{Thrift Savings Plan accounts } \leq \$100,000)$$

MNW Example:

Assets		Liabilities	
Bank Account	\$12,000	Mortgage	\$180,000
Thrift Savings Plan	\$165,000	Credit Cards	\$20,000
Home Value	\$400,000	<b>Total Liabilities</b>	<b>\$200,000</b>
<b>Total Assets</b>	<b>\$577,000</b>	Student Loans	\$40,000

$$\text{MNW} = (\$577,000) - (\$200,000) - (\$100,000) - (\$40,000) - (\$100,000) = \$137,000$$

RWS annual fees are calculated as follows:

MNW	Annual Fee Calculation
\$0 - \$120,000	\$1,200
\$120,001 - \$500,000	\$1,200 + (0.74% * (MNW-\$120,000))
\$500,001 - \$1,500,000	\$4,000 + (0.5% * (MNW -\$500,000))
\$1,500,001 - \$5,000,000	\$9,000 + (0.25% * (MNW -\$1,500,000))
> \$5,000,001	\$17,750 + (0.1% * (MNW - \$5,000,000))

RWS also charges a one-time onboarding fee of \$300, in advance. The onboarding fee is due at the time the client service agreement is signed. The onboarding fee does not count toward the minimum fee for a higher level of service.

Annual fees will be estimated during the initial client interview and the on-boarding process, but a final annual fee determination cannot be made until the client provides RWS with financial documents substantiating their modified net worth. This must be done within 30 days of signing the client service agreement unless other arrangements have been made with RWS. The fee schedule will be signed addendum to the client service agreement. Fees will be charged retroactively to the date the client service agreement was signed.

Monthly subscription fees will equal the annual fee divided by twelve. Monthly subscription fees are payable to Redeployment Wealth Strategies by cash, check, credit, debit, or ACH transaction.

All client fees are governed by the fee schedule addendum to the customer service agreement and are guaranteed for a 12-month period from the date of signing. Annual fees will be recalculated annually, and a new fee schedule addendum to the client service agreement signed.

Fees are not negotiable however, RWS reserves the right to adjust the annual fee calculation on a case-by-case basis, or to waive the onboarding fee in special circumstances. Monthly subscription fees (the monthly billing of annual fees) will typically be rounded down to a number divisible by 5.

The minimum service period is 12 months.

Financial Planning Service Levels:

- Clients paying annual fees less than \$3,000 will receive the **Wealth Builder** services.
- Clients paying annual fees of \$3,000 to \$6,000 will receive the **Wealth Manager** services.
- Clients paying annual fees of \$6,000 or more will receive the **Legacy Planner** services.

### **Hourly Fees**

Clients desiring short-duration engagements with RWS have the option of paying based on an hourly rate of \$200/hour. All hourly fees are billed in arrears.

### **Additional Fees Will Be Charged By The Custodian**

In accordance with Virginia laws on asset custody, RWS uses third-party custodians for client accounts. Third party custodians will charge clients fees for custodial services provided. These fees may include a charge based on the value of assets in custody and trading fees. Third party custodians will deduct their fees directly from the client’s account. RWS will consider the client’s investment style, assets, and objectives when determining which third party custodian to use. Third party custodian fees are in addition to the fees charged by RWS.

### **Additional Fees Will Be Charged By The Fund Investment Company**

RWS invests managed client portfolios in exchange traded funds (ETFs) and mutual funds. The assets with ETFs and mutual funds are independently managed by investment companies (i.e. Vanguard, Blackrock, Fidelity, etc.). Investment companies charge a fee, typically a fraction of a percentage of assets. The investment companies deduct this fee directly from the fund prior to distributions being made to investors in the fund. The fees charged by the investment companies are in addition to the fees charged by RWS. RWS discriminates in favor of low fee ETFs and mutual funds when selecting investments for client portfolios.

### **Fees for Advising on Employer-Sponsored Retirement Plans**

Clients desiring advice on establishing a retirement plan within their business will be billed for that service at the hourly rate. Clients desiring ongoing support and service for the retirement plan they sponsor will be billed at a negotiated per capita rate. All services to businesses are billed in arrears.

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

RWS does not charge performance-based fees, nor does it engage in side-by-side management. RWS believes those practices generate conflicts of interest, and thus avoids them.

### **Item 7: Types of Clients**

RWS serves individuals and families. There is no minimum account or asset requirement for engaging RWS for financial planning and investment advice.

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

RWS's method of investment management is best described as "low-cost, passive, strategic, index-based investing". RWS agrees with the large body of research indicating the three most valuable indicators of a portfolio's future performance are:

- Asset allocation appropriate to risk tolerance and objectives
- Cost of investing
- Tax efficiency

With that in mind RWS works with each client to articulate their investment objectives, their risk tolerance, and their risk suitability given their particular life situation. RWS then uses this information to develop a portfolio of low-cost index ETFs and mutual funds allocated across multiple asset classes in a manner suitable to the client. Portfolios are then adjusted (rebalanced) annually (as needed) to reflect the fact the timeline to achieve the investment objective(s) is one year shorter. Portfolios may also be adjusted to adapt to changing life situations, investment objectives, or to take advantage of tax loss harvesting to improve portfolio efficiency.

RWS uses the following asset classes when developing client portfolios:

- Short-term US Govt Bonds
- Intermediate-term US Govt Bond

- Long-term US Govt Bonds
- US Corporate Bonds
- US Municipal Bonds
- Non-US Govt Bonds
- US Large Cap Stocks
- US Small & Med Cap Stocks
- Stocks from Developed Nations (non-US)
- Emerging Market Stocks
- Commodities
- Real Estate Investment Trusts

RWS will also consider (but not recommend or manage) the following asset classes when developing a client portfolio:

- Real Estate
- Business Assets
- Insured Military Pensions

These asset classes all carry investment risk, including the risk of losing your original investment (investment principal). RWS actively seeks to mitigate risk to client portfolios by applying historical data on asset allocations to the current market environment. While short-term losses are inherent in a long-term portfolio, long-term losses have historically been unlikely in an appropriately allocated portfolio. Clients are required to develop an Investment Policy Statement acknowledging the inevitability of short-term fluctuations and outlining planned responses.

What RWS will NEVER do:

- Conduct frequent trading in client accounts to generate fees
- Execute trades to try to “time the market”
- Chase the hottest stocks
- Expose your portfolio to higher risks to increase fees
- Try to sell you an investment product that pays commissions to advisers

In order to determine the client’s risk tolerance and risk suitability, RWS will first gather the following information from the client:

- current financial situation
- current, mid-term, and long-term needs
- investment goals and objectives
- level of investment knowledge
- tolerance or appetite for risk
- reasonable restrictions involving the portfolio

In rising markets, a broadly-diversified, low-cost, passive, index-based portfolio will always lag the hottest market sectors and asset classes. RWS’s strategy will rarely, if ever, outperform the broad market, but seeks instead to extract the benefits of expanding economies and positive business cycles while minimizing the losses incurred by incorrectly predicting which sectors and asset classes will be the next to outperform the broader market. Parts of the client’s portfolio will lag the broad market indices. Parts will likely outperform, but the overall portfolio strategy seeks to capture the returns of the broad markets while minimizing fees and

taxes paid by the client.

Clients seeking to have their portfolio outperform the broad market will not be satisfied with the strategy employed by Redeployment Wealth Strategies and should look elsewhere for investment advice.

RWS believes its strategies and investment recommendations are designed to produce the appropriate potential return for the given level of risk; however, there is no guarantee that an investment objective or planning goal will be achieved. Each client must be able to bear the risk of loss associated with their account, which may include the loss of some, or all, of the client's principal.

### **Examples of investment risk include:**

#### Failure to Implement Investment Policy Decisions

As a financial planning client, you are free to accept or reject any or all of the recommendations made to you. While no advisory firm can guarantee future performance, no plan can succeed if it is not implemented. Clients who choose not to take the steps recommended in their financial plan and/or investment policy statement may face increased risk that their stated goals and objectives will not be achieved, as well as a loss of the client's principal investment.

#### Inflation Risk

When any type of inflation is present, a dollar next year will not buy as much as a dollar today because purchasing power is eroding at the rate of inflation. This could result in the client's portfolio failing to reach stated goals.

#### Market Risks

When an asset class as a whole falls, it can cause a drag on the prices of other asset classes. This can cause a loss of client principal

#### Political Risk

The risk of financial, market, or personal losses because of political decisions or disruptions in a particular country or region. Additionally, Redeployment Wealth Strategies advocates the use of allocating client investments among tax-advantaged (qualified) accounts. Such accounts will sometimes have limited investment options, and low-cost index-based funds may not be available. However, RWS may determine the tax benefits of the account may be more valuable than the client's ability to invest at lower cost in another account without tax advantages. Finally, it is possible that after investing in a tax-advantaged account the Congress of the United States will amend the tax laws such that the tax advantages of the account are altered or removed. A loss of client principal may result under such circumstances.

#### ETF and Mutual Fund Risks

The risk of owning ETFs and mutual funds reflect their underlying securities (e.g., stocks, bonds, etc.). RWS believes this risk is offset by the benefits of a buy-and-hold approach and/or by taking advantage of strategies such as dollar-cost averaging which over time can decrease the overall cost of fund purchases. We do not recommend leveraged or inverse ETFs to our advisory clients due to their inherent heightened risk. ETFs are not a guaranteed investment vehicle, and a loss of client principal may occur.

#### Credit Risk

The potential risk that an issuer would be unable to pay scheduled interest or repay principal at maturity, sometimes referred to as "default risk." Credit risk may also occur when an issuer's ability to make payments of principal and interest when due is interrupted. This may result in a negative impact on all forms of debt

instruments, as well as funds or ETF share values that hold these issues. Clients holding these issues in their portfolio may experience a loss of principal.

#### Duration Risk

Duration is a measure of a bond's volatility, expressed in years to be repaid by its interest payments. Bonds with longer durations carry more risk and higher price volatility than bonds of shorter duration. While duration is considered when selecting bond investments for client portfolios, a loss of client principal may still occur.

#### Interest Rate Risk

The risk that the value of a holding will decrease because of an increase in interest rates. Clients holding securities sensitive to interest rates may experience a loss of principal during unfavorable interest rate environments.

#### *A Note on Socially Conscious Investing:*

If you require your portfolio to be invested according to socially conscious principles, you should note that returns on investments of this type may be limited and because of this limitation you may not be able to be as well-diversified among various asset classes. The number of publicly traded companies that meet socially conscious investment parameters is also limited, and due to this limitation, there is a probability of similarity or overlap of holdings, especially among socially conscious mutual funds or ETFs. Therefore, there could be a more pronounced positive or negative impact on a socially conscious portfolio, which could be more volatile than a fully diversified portfolio.

#### Item 9: Disciplinary Information

Neither RWS nor Paul or Sean has been involved in any material criminal or civil action in a domestic, foreign or military jurisdiction, or an administrative enforcement action from any state or federal agency, or self-regulatory organization proceeding that would reflect poorly upon Redeployment Wealth Strategies.

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

RWS is not registered nor does it have an application pending to register as a Financial Industry Regulatory Authority (FINRA) or National Futures Association (NFA) member firm, nor is RWS required to be registered with such entities. RWS does not have a material relationship with any of the following types of entities:

- bank, credit union or thrift institution
- trust company
- lawyer or law firm
- other investment advisor firms (including financial planners, municipal advisors or third-party investment advisors)
- insurance company or insurance agency

Paul D. Allen is the sole proprietor of PIM Tax Services, which provides tax preparation and tax planning services to both RWS clients and non-RWS clients. PIM Tax Services does not provide bookkeeping services or any of the other services typically associated with any of the aforementioned entities.

Regardless of service tier, basic tax planning is provided by RWS. Tax preparation and representation and proactive tax services described in Item 4 of this brochure are provided by PIM Tax Services. RWS clients are not required to use PIM's services. Clients' financial data is not shared with PIM without prior expressed written consent from the client.

#### Item 11: Code of Ethics

Paul is a proud member of the Financial Planning Association (FPA), and sits on the Board of Directors for the Hampton Roads chapter of FPA. Paul and Sean have adopted the FPA *Code of Ethics* for RWS.

All financial planning services will be delivered in accordance with the following standard of care:

Principle 1: Provide professional services with integrity.

Principle 2: Provide professional services objectively.

Principle 3: Maintain the knowledge and skills necessary to provide professional services competently.

Principle 4: Be fair and responsible in all professional relationships. Disclose conflicts of interest.

Principle 5: Protect the confidentiality of all client information.

Principle 6: Act in a manner that demonstrates exemplary professional conduct.

Principle 7: Provide professional services diligently.

Clients or prospective clients desiring a copy of the Redeployment Wealth Strategies Code of Ethics will receive one upon request.

#### Item 12: Brokerage Practices

RWS will recommend brokerage services for client accounts in a manner best suited to the needs and objectives of the individual client. When evaluating brokerages RWS considers the following:

- a. Fees charged to client
- b. Transaction costs passed on to client
- c. Fees charged to RWS
- d. Ease of use
- e. Reputation for reliability
- f. Availability of retirement accounts

RWS does not receive any commissions or compensation of any kind from any brokerage it may recommend. The types of commissions or compensation NOT received by RWS include:

- a. Research and other soft dollar benefits. RWS does not take soft dollar benefits in order to avoid a conflict of interest between RWS compensation and the needs of the client.
  - 1) RWS does not receive brokerage commissions, markups or markdowns, or brokerage provided research, and therefore does not receive any benefits of this kind from any brokerage.
  - 2) RWS does not use broker research or other product services, and therefore has no incentive to select or recommend a broker-dealer based on research or other product services.
  - 3) RWS clients will not pay higher fees in exchange for soft dollar benefits.

- 4) RWS does not receive soft dollar benefits for any client accounts.
  - 5) Within the last fiscal year neither RWS nor any related persons have received any products or services from a brokerage.
  - 6) In the past year RWS did not at any time direct any client transactions to a specific broker-dealer in exchange for soft dollar benefits.
- b. Neither Redeployment Wealth Strategies nor any related persons receive client referrals from any broker-dealer. Client referrals were not a consideration when recommending a brokerage as custodian for client accounts.
- 1) Some investment advisors receive client referrals from their broker-dealer, giving them an incentive to use a particular broker-dealer. This can create a conflict of interest between the client's needs and the economic interests of the advisor. RWS does NOT engage in this practice.
  - 2) During the last fiscal year RWS did not direct any clients to a particular broker-dealer in exchange for referrals.
- c. By recommending a particular brokerage, Redeployment Wealth Strategies may not achieve the most favorable security transaction pricing in the client's account. Redeployment Wealth Strategies believes the long term value of low fee structures will more than offset any risk to the client on individual trade executions.
- d. Redeployment Wealth Strategies does not require or permit clients to direct a specific brokerage when executing securities transactions. Some, but not all, advisers require clients to direct a specific brokerage. Having the client direct the brokerage may cause the client to miss the most favorable execution of securities transactions – a practice that can cost clients more money. If a client desires to direct the broker, he or she would most likely be happier with a different investment advisor.

#### Item 13: Account Review

For clients who have engaged RWS for investment management services RWS reviews client accounts quarterly or when specifically requested by the client. The custodian will provide each client with a quarterly report on portfolio performance. RWS provides client reports when requested by the client or when action is needed to adjust the portfolio.

Clients working to develop their initial financial plan should plan on several meetings in the first year. RWS recommends semi-annual meetings during the plan monitoring and implementation phase. Frequency of meetings can be adjusted to suit the client. Oral and written reports on financial plan development and implementation are provided to the client throughout the planning process.

#### Item 14: Client Referrals and Other Compensation

There is not a referral fee paid to or received from another financial or professional services organization that we may recommend to you; nor is there an established *quid pro quo* for such arrangements.

Paul D. Allen and Sean C. Gillespie hold individual membership and serve on boards and committees of professional industry associations. Participation in these entities requires membership fees to be paid, adherence to ethical guidelines, as well as experiential and educational requirements. A benefit these entities may provide to the investing public is the availability of online search tools that allow interested parties (prospective clients) to search for individual participants within a selected state or region. These passive websites may provide means for interested persons to contact a participant via electronic mail, telephone number, or other contact information, in order to interview the participating member. A portion of membership fees may be used so their names will be listed in some or all of these entities' websites (or other

listings). Prospective clients locating RWS via these methods are not actively marketed by the noted associations. Clients who find RWS in this way do not pay more for their services than clients referred in any other fashion.

#### Item 15: Custody

RWS does not take custody of client funds or investments. RWS uses third-party custodians for client investment accounts. RWS cannot receive client investment funds from either the client or the custodian. RWS will facilitate the relationship between the client and third party custodian, but RWS cannot make deposits to or withdrawals from client accounts. This is for the client's protection.

Clients purchasing investment services will receive quarterly statements from the custodian. Clients are encouraged to review those statements carefully and contact RWS if any discrepancies are noted.

#### Item 16: Investment Discretion

RWS does not seek or use discretionary authority over client investment accounts. Discretionary authority allows the advisor to make investment decisions without first consulting with the client. RWS will always consult with the client prior to executing investment decisions.

#### Item 17: Voting Client Securities

RWS does not have authority to vote client securities. Clients may receive proxies or solicitations to vote on securities directly from the custodian. Clients are encouraged to review such voting materials carefully and vote as they see fit. Clients in receipt of a solicitation to vote their shares may contact Redeployment Wealth Strategies via the email or phone number listed on the cover sheet to discuss the solicitation, but RWS will not offer any recommendations or guidance on how the client should vote.

#### Item 18: Financial Information

RWS engagements do not require that we collect fees from you of \$500 or more for our advisory services that we have agreed to perform six months or more into the future.

Neither RWS nor the managing members serve as general partner for a partnership or trustee for a trust in which the firm's advisory clients are either partners of the partnership or beneficiaries of the trust.

Due to the nature of our firm's services and operational practices, an audited balance sheet is not required per statute and is not included with this brochure.

Financial Conditions Reasonably Likely to Impair Firm's Ability to Meet Commitments to Clients:

There are no financial conditions likely to impair RWS's ability to meet commitments to clients.

Bankruptcy Petitions during the Past 10 Years:

Neither RWS nor Paul D. Allen nor Sean C. Gillespie have been the subject of a bankruptcy petition at any time.

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

For further information involving RWS managing members Paul D. Allen and Sean C. Gillespie, their business activities, as well as material conflicts of interest, please refer to areas previously disclosed in Items 6 and 9 through 11 of this brochure, as well as the accompanying Form ADV Part 2B brochure supplement that immediately follows these pages.

#### Business Continuity Plan:

RWS maintains a business continuity and succession contingency plan integrated within the organization to ensure it appropriately responds to events that pose a significant disruption to its operations. The business continuity plan is available for review upon request.

#### Supervisory Manual:

~~Paul D. Allen and Sean C. Gillespie are the only investment advisor representatives of RWS, therefore Redeployment Wealth Strategies is not required to have a supervisory manual in accordance with 21VAC5-80-170.~~



Redeployment  
Wealth Strategies

*Form ADV Part 2B*  
*“The Brochure Supplement”*

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*Redeployment Wealth Strategies, LLC*

Registered Investment Advisor

582 Lynnhaven Pkwy suite 101, Virginia Beach, VA 23452 | <http://RedeploymentWealth.com>

Paul D. Allen – Managing Member | (757) 716-1255 | [Paul@RedeploymentWealth.com](mailto:Paul@RedeploymentWealth.com)

Sean C. Gillespie – Managing Member | (757) 752-8055 | [Sean@RedeploymentWealth.com](mailto:Sean@RedeploymentWealth.com)

August 23, 2018

This brochure provides information about Paul D. Allen and Sean C. Gillespie that supplements Redeployment Wealth Strategies, LLC Form ADV Part 2A firm brochure. You should have received a copy of that brochure. Please contact RWS at (757) 752-8055 if you did not receive the full brochure or if you have any questions about the contents of this supplement. Additional information about Paul D. Allen and Sean C. Gillespie is available on the Securities and Exchange Commission’s (SEC) website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

***The managing members (principle executives) of Redeployment Wealth Strategies, LLC are Paul D. Allen and Sean C. Gillespie. Redeployment Wealth Strategies LLC may also be referred to as “Redeployment Wealth Strategies” or “RWS”.***

## Item 2: Educational Background and Business Experience

Regulatory guidance requires the firm to disclose relevant post-secondary education and professional training for each principal executive and associate of the firm, as well as their business experience for at least the most recent five years.

### Principal Executive Officers and Management Members:

*Investment Advisor Representative/Managing Member  
(Chief Compliance Officer)*

Paul David Allen

Year of Birth: 1964 | CRD Number: 6582946

### *Educational Background and Business Experience*

#### **Educational Background:**

##### *Bachelor of Arts*

Jacksonville University College of Arts and Sciences

Jacksonville, Florida

##### *Executive Certificate in Financial Planning*

Old Dominion University College of Business and Public Administration

Norfolk, VA

Uniform Investment Adviser Law Examination<sup>1</sup>/NASAA Series 65

Enrolled Agent, Federally Licensed to Practice before the IRS<sup>2</sup> (120774-EA)

#### **Work/Business Experience:**

Redeployment Wealth Strategies (formerly PIM Financial Partners), LLC; APR 2015-Present, Virginia Beach, VA

Managing Member, APR 2015-Present

Chief Compliance Officer/Investment Advisor Representative; NOV 2015-Present

PIM Tax Services, LLC; APR 2015-Present, Virginia Beach, VA

Managing Member/Enrolled Agent; APR 2015-Present

H&R Block; NOV 2014 – APR 2015, Virginia Beach, VA

Tax Preparer

United States Coast Guard Civilian Employee; MAR 2012 – AUG 2017, Virginia Beach, VA

Supervisory Intelligence Analyst

United States Army Civilian Employee; FEB 2011 - FEB 2012, Camp Lemonnier, Djibouti

Supervisory Intelligence Analyst

United States Navy Active Duty; MAR 1987 – NOV 2010, Various

Enlisted 1987 – 1995; Commissioned Officer 1995 - 2010

*Investment Advisor Representative/Managing Member*

Sean Campbell Gillespie

Year of Birth: 1970 | CRD Number: 6036446

*Educational Background and Business Experience*

**Educational Background:**

*Bachelor of Science*

United States Naval Academy

Annapolis, Maryland

General Securities Representative<sup>3</sup> / FINRA Series 7

Uniform Combined State Law / NASAA Series 66

**Work/Business Experience:**

Redeployment Wealth Strategies, LLC; AUG 2018-Present, Virginia Beach, VA

Managing Member, JUL 2018-Present

Investment Advisor Representative; JUL 2018-Present

Gillespie Advisors; MAY 2014-JUL 2018, Chesapeake, VA

Managing Member, MAY 2014-JUL 2018

Investment Advisor Representative of Securities America (CRD 110518), MAY 2014-JUL 2018

Registered Representative of Securities America (CRD 110518), MAY 2014-JUL 2018

Life, Health & Annuities Insurance Producer, MAY 2014-JUL 2018

Paddock Financial; SEP 2013 – APR 2014, Virginia Beach, VA

Investment Advisor Representative of Securities America (CRD 110518), SEP 2013 – APR 2014

Registered Representative of Securities America (CRD 110518), SEP 2013 – APR 2014

Life, Health & Annuities Insurance Producer, SEP 2013 – APR 2014

United States Navy Active Duty; MAY 1992 – May 2012, Various

Commissioned Officer 1992 - 2012

### Item 3: Disciplinary Information

Registered investment advisors are required to disclose certain material facts about its associated personnel regarding any legal or disciplinary events, including criminal or civil action in a domestic, foreign, or military court, or any proceeding before a state, federal or foreign regulatory agency, self-regulatory organization, or suspension or sanction by a professional association for violation of its conduct rules, that would be material to your evaluation of each person providing investment advice. Neither Paul D. Allen nor Sean C. Gillespie have been the subject of any such event.

### Item 4: Other Business Activities

Paul D. Allen is also the managing member of PIM Tax Services, LLC, a tax planning and preparation firm collocated with Redeployment Wealth Strategies. The businesses are operated separately for marketing, continuity, and liability mitigation purposes.

The amount of time spent on other business activities varies, but as of July 2018 averages 15 hours per week. The growth of Redeployment Wealth Strategies is Paul's primary focus and will cause a direct decline in the amount of time spent on other business activities.

Neither Paul nor Sean are registered, nor does either have an application pending to register, as a registered representative of a broker/dealer or associated person of a futures commission merchant, commodity pool operator, or commodity trading advisor. Therefore, they do not receive commissions, bonuses or other compensation based on the sale of securities, including that as a registered representative of a broker/dealer or the distribution or service ("trail") fees from the sale of mutual funds.

Neither Paul, Sean, nor RWS has a material relationship with the issuer of a security.

### Item 5: Additional Compensation

Neither Paul, Sean, nor RWS is compensated for advisory services involving performance based fees. Policy (based on a strict code of ethics) does not allow persons associated with RWS to accept or receive additional economic benefit, such as sales awards or other prizes, for providing advisory services to clients.

### Item 6: Supervision

In addition to being an Investment Adviser Representative, Paul serves as RWS's Chief Compliance Office. Because supervising one's self poses a potential conflict of interest, RWS has adopted policies and procedures to mitigate this conflict, and may use the services of unaffiliated professionals and best practices from esteemed professional organizations to ensure RWS's oversight obligations are met.

Questions relative to RWS, its services, or this Form ADV Part 2 brochure may be made to the attention of Paul D. Allen at (757) 716-1255 or Sean C. Gillespie at (757) 752-8055. Additional information about RWS, Paul D. Allen, or Sean C. Gillespie is available at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). A search of this site for firms may be accomplished by firm name or a unique firm identifier, known as a CRD number. The CRD number for The Redeployment Wealth Strategies, LLC is 277147.

The business and disciplinary history, if any, of an investment advisory firm and its representatives may also be obtained by calling the Virginia Division of Securities & Retail Franchising at (804) 371-9187.

#### Item 7: Requirements for State-Registered Advisers

There have been no awards, sanctions or other reportable matters involving Paul D. Allen, Sean C. Gillespie, or Redeployment Wealth Strategies in a self-regulatory, administrative, or arbitration proceeding. Neither Paul D. Allen, Sean C. Gillespie, nor Redeployment Wealth Strategies has been the subject of a bankruptcy petition.

<sup>1</sup> North American Securities Administrators Association (NASAA) examinations are "criterion based;" candidates who pass the exam are considered to have met the minimum competency level. The completion of an industry examination does not constitute or imply a person is "approved" or "endorsed" by a state or federal regulatory body.

<sup>2</sup> Special Enrollment Examinations are administered by the Internal Revenue Service. Successful completion of all three special enrollment examinations plus a background check qualifies an individual to become an Enrolled Agent. Similar to a CPA or a lawyer, Enrolled Agents are granted unlimited rights to represent clients before the IRS.

<sup>3</sup> Financial Industry Regulatory Authority (FINRA) examinations are "criterion based;" candidates who pass the exam are considered to have met the minimum competency level. The completion of an industry examination does not constitute or imply a person is "approved" or "endorsed" by a state or federal regulatory body.