

## Item 1: Cover Page



# Pomegranate Financial

## Refresh & Simplify Your Financial Life

Pomegranate Financial LLC

33 North 800 West  
Springville, Utah, 84663

**Form ADV Part 2A – Firm Brochure**

(385) 398-4015

[www.pomegranatefinancial.com](http://www.pomegranatefinancial.com)

Dated January 28th, 2024

This Brochure provides information about the qualifications and business practices of Pomegranate Financial LLC, “PF”. If you have any questions about the contents of this Brochure, please contact us at (385) 398-4015. 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.

Pomegranate Financial LLC is registered as an Investment Adviser with the State of Utah. Registration of an Investment Adviser does not imply any level of skill or training.



Additional information about PF is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov), which can be found using the firm's identification number, 308992.

## Item 2: Material Changes

The last annual update of this Brochure was filed on February 7th, 2023. The following changes have been made to this version of the Disclosure Brochure:

### January 24th, 2024:

- Item 4 Advisory Business: PF currently has discretionary authority for investment accounts.
- Item 5 Fees & Compensation: Fees were increased for Basic Financial Planning to \$1,650 (\$275/month for 12 months); Premier Financial Planning to \$2,760 (\$230/month for 12 months); and CFO \$4,500 (\$375/month for 12 months).
- Item 5 Fees & Compensation: Temporary discounts can now be made available and are non-negotiable.

### August 18th, 2023:

- Item 1 Cover Page: The phone number has been changed to 385.398.4015
- Item 4 Part 2A and Item 19 Part 2B:
  - Removed Blake's role as a VP of Home Runs 4 Adoption.
  - Name of The Cabinet Room: A Presidential Card Game Inc was changed to Presidential Card Games Inc.

### August 16th & 23rd, 2022:

- Item 4: Added the business service of Pomegranate Financial Membership which provides various benefits for \$600/year (paid monthly at \$50/month).
- Item 5: Added the fees for the Pomegranate Financial Membership.

### January 9th, 2022:

- Item 5: Upfront Onboarding Fee under Investment Services can be waived for clients signed up for Premier Financial Planning or Personal CFO service.
- Item 5: Changes to Fee Structure: Increased Premier Financial Planning service from \$208/Month to \$225/Month (from \$2,500/year to \$2,700/year).

### July 6th, 2021:



- Item 4: Description of services provided: Added tax planning, business & individual tax preparation, and bookkeeping services.
- Item 5: Changes to Fee Structure: Hourly fee increased to \$200 per hour instead of \$150. Added services to include three different tiered services with differing fees and time frames for each service.

#### January 8th, 2021:

- Item 5: Hourly fee increased to \$150 per hour instead of \$75 per hour.
- Item 19: Added Outside Business Activity. Added EA and CFP Professional Designation.
- ADV Part 2B, Item 4: Added Outside Business Activity. Added EA and CFP Professional Designation.

From time to time, we may amend this Brochure to reflect changes in our business practices, changes in regulations, and routine annual updates as required by securities regulators. Either this complete Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of Pomegranate Financial LLC.

## Item 3: Table of Contents

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## Item 4: Advisory Business

### Description of Advisory Firm

Pomegranate Financial LLC became registered as an Investment Adviser with the State of Utah in June 2020. We were founded in March 2020. Blake Jones is the principal owner of PF. PF currently reports no non-discretionary and \$1,767,500 in discretionary Assets Under Management. Assets Under Management were calculated as of December 31, 2023

### Types of Advisory Services

#### Investment Management using MTG, LLC “Betterment Securities” / “Betterment”

We offer the use of MTG, LLC “Betterment Securities” for portfolio management services. We assist Clients in selecting an appropriate allocation model, completing Betterment’s investor profile questionnaire, and interacting with Betterment. Our review process and analysis of outside managers is further discussed in Item 8 of this Form ADV Part 2A. PF does not select third-party money managers on a discretionary basis. Upon engaging with PF for investment management services and reviewing the recommendation to use Betterment as a third party investment manager, the adviser will assist the client in completing the third party management agreement and account paperwork with Betterment. Additionally, we will meet with the Client on a periodic basis to discuss changes in their personal or financial situation, suitability, and any new or revised restrictions to be applied to the account. Fees pertaining to this service are outlined in Item 5 of this brochure. Investment Management clients who engage with PF and utilize Betterment for portfolio management services are placed into Betterment’s Wrap Fee Program as described in their wrap fee brochure which states that their wrap fee program has a fee structure that provides clients with advisory and brokerage services for a bundled fee with no additional account activity charges for execution of trades.

#### Comprehensive Financial Planning

This service involves working one-on-one with a planner over an extended period of time, typically 6-12 months by phone, video conference, or in-person. Upon desiring a financial plan, a client will be taken through establishing their goals and values around money. A client will pay an annual or semi-annual fee broken down on a monthly basis per the length of the engagement. They will be required to provide information to help complete the following areas of analysis: net worth, cash flow, credit, employee benefit, retirement planning, insurance,



investments, education planning, debt management, business planning, tax planning, bookkeeping (business) and estate planning.

The planner will provide guidance to help the Client organize, structure, and streamline their finances. The planner will help the Client protect and enhance the security of their financial information. Once the Client's information is organized and information secure, their plan will be built and analyzed, and then the findings, analysis and potential changes to their current situation will be reviewed with the Client. Clients subscribing to this service will receive a written or an electronic report, providing the Client with a detailed financial plan designed to achieve his or her stated financial goals and objectives. Included in the financial plan is a list of recommendations for the Client to implement.

A 6-12 month schedule will be created to help the Client implement recommendations. The Client's financial situation and goals will be monitored and revised throughout the term of the engagement as needed and follow-up meetings, phone calls, and emails will be made to the Client to confirm that any agreed upon action steps have been carried out.

### **Project-Based: Hourly Financial Planning**

From time to time clients will engage the financial planner requesting help with only a certain financial topic or project. PF provides project-based financial planning services on topics such as retirement planning, risk management, education savings, cash flow, debt management, work benefits, real estate investing, business planning, investment planning, tax planning, estate and incapacity planning.

Financial planning involves an evaluation of a Client's current and future financial state by using currently known variables to predict future cash flows, asset values, and withdrawal plans. The key defining aspect of financial planning is that through the financial planning process, all questions, information, and analysis will be considered as they affect and are affected by the entire financial and life situation of the Client.

Clients purchasing this service will receive a written or an electronic report, providing the Client with a detailed plan designed to achieve his or her stated financial goals and objectives only in regards to the topic or project inquired about.

In general, the financial plan will address any or all of the following areas of concern. The Client and advisor will work together to select the specific area(s) to cover. These areas may include, but are not limited to, the following:

- **Business Planning:** We provide consulting services for Clients who currently operate their own business, are considering starting a business, or are planning for an exit from their current business. Under this type of engagement, we work with you to assess your current situation, identify your objectives, and develop a plan aimed at achieving your goals.
- **Cash Flow and Debt Management:** We will conduct a review of your income and expenses to determine your current surplus or deficit along with advice on prioritizing how any surplus should be used or how to reduce expenses if they exceed your income. Advice may also be provided on which debts to pay off first based on factors such as the interest rate of the debt and any income tax ramifications. We may also provide guidance on refinancing, consolidating, or restructuring debt. This may include preparing Clients to apply and qualify for debt. We may also recommend what we believe to be an appropriate cash reserve



that should be considered for emergencies and other financial goals, along with a review of accounts (such as money market funds) for such reserves, plus strategies to save desired amounts.

- **Education Savings:** Includes projecting the amount that will be needed to achieve education or other post-secondary education funding goals, along with advice on ways for you to save the desired amount. Recommendations as to savings strategies are included, and, if needed, we will review your financial picture as it relates to eligibility for financial aid or the best way to contribute to grandchildren (if appropriate).
- **Employee Benefits Optimization:** We will provide review and analysis as to whether you, as an employee, are taking the maximum advantage possible of your employee benefits. If you are a business owner, we will consider and/or recommend the various benefit programs that can be structured to meet both business and personal retirement goals.
- **Estate Planning:** This usually includes an analysis of your exposure to estate taxes and your current estate plan, which may include whether you have a will, powers of attorney, trusts, and other related documents. Our advice also typically includes ways for you to minimize or avoid future estate taxes by implementing appropriate estate planning strategies such as the use of applicable trusts. We always recommend that you consult with a qualified attorney when you initiate, update, or complete estate planning activities. We may provide you with contact information for attorneys who specialize in estate planning when you wish to hire an attorney for such purposes. From time-to-time, we will participate in meetings or phone calls between you and your attorney with your approval or request.
- **Financial Goals:** We will help Clients identify financial goals and develop a plan to reach them. We will identify what you plan to accomplish, what resources you will need to make it happen, how much time you will need to reach the goal, and how much you should budget for your goal.
- **Insurance:** Review of existing policies to ensure proper coverage for life, health, disability, long-term care, liability, home, and automobile.
- **Investment Analysis:** This may involve developing an asset allocation strategy to meet Clients' financial goals and risk tolerance, providing information on investment vehicles and strategies, reviewing employee stock options, as well as assisting you in establishing your own investment account at a selected broker/dealer or custodian. The strategies and types of investments we may recommend are further discussed in Item 8 of this brochure.
- **Retirement Planning:** Our retirement planning services typically include projections of your likelihood of achieving your financial goals, typically focusing on financial independence as the primary objective. For situations where projections show less than the desired results, we may make recommendations, including those that may impact the original projections by adjusting certain variables (e.g., working longer, saving more, spending less, taking more risk with investments).



If you are near retirement or already retired, advice may be given on appropriate distribution strategies to minimize the likelihood of running out of money or having to adversely alter spending during your retirement years.

- **Risk Management:** A risk management review includes an analysis of your exposure to major risks that could have a significant adverse impact on your financial picture, such as premature death, disability, property and casualty losses, or the need for long-term care planning. Advice may be provided on ways to minimize such risks and about weighing the costs of purchasing insurance versus the benefits of doing so and, likewise, the potential cost of not purchasing insurance (“self-insuring”).
- **Tax Planning Strategies:** Advice may include ways to minimize current and future income taxes as a part of your overall financial planning picture. For example, we may make recommendations on which type of account(s) or specific investments should be owned based in part on their “tax efficiency,” with the consideration that there is always a possibility of future changes to federal, state or local tax laws and rates that may impact your situation.

We recommend that you consult with a qualified tax professional before initiating any tax planning strategy, and we may provide you with contact information for accountants or attorneys who specialize in this area if you wish to hire someone for such purposes. We will participate in meetings or phone calls between you and your tax professional with your approval.

## **Educational Seminars and Speaking Engagements**

PF may provide seminars on an “as announced” basis for groups seeking general advice on investments and other areas of personal finance. The content of these seminars will vary depending upon the needs of the attendees. These seminars are purely educational in nature and do not involve the sale of any investment products. Information presented will not be based on any individual’s person’s need, nor does PF provide individualized investment advice to attendees during these seminars.

## **Tax Preparation & Bookkeeping**

We offer Tax Preparation and Bookkeeping services for our clients to assist with the filing of federal and state tax returns for individuals, trusts, and businesses. The fees associated with tax preparation and bookkeeping services are included in the Premier Financial Planning and/or Personal CFO services and are disclosed in Item 5.

We will utilize the services of Dave Jones Account Services “DJAS”, a third-party accounting and tax planning firm, to facilitate the preparation and filing of your tax return and we will work with you and DJAS to gather the necessary information as part of this service.

If the client engages PF for Tax Planning Services (through the Premier Planning or Personal CFO services), then DJAS’ licensed tax preparers will work with the client to also conduct research and answer tax-related questions to help the client adequately plan through certain transactions and financial changes so that they can fully



understand any tax consequences or opportunities for savings in the future. This is included as part of the fee for Premier Planning and Personal CFO services. The difference being Premier Planning only involves individual tax services whereas Personal CFO also includes business tax services. The service is provided by DJAS licensed tax preparers who will bill PF directly for the services rendered. PF pays DJAS for these services and clients will not be billed separately for these services from DJAS.

### **Client Tailored Services and Client Imposed Restrictions**

We offer different services to our clients based on complexity-based engagements.

#### **Basic Financial Planning**

We provide a review of your Net Worth, Cash Flow, Insurance, Credit, Employee Benefits, Retirement Planning, education Planning, Debt Management, and Estate Planning. Systems and software are provided to help you Organize, Structure, and Streamline your finances.

#### **Premier Planning**

We provide a review of your Net Worth, Cash Flow, Insurance, Credit, Employee Benefits, Retirement Planning, education Planning, Debt Management, and Estate Planning. In addition, Tax Planning, and Individual Tax Preparation is included. Systems and software are provided to help you Organize, Structure, and Streamline your finances.

#### **Personal CFO**

We provide a review of your Net Worth, Cash Flow, Insurance, Credit, Employee Benefits, Retirement Planning, Education Planning, Debt Management, Estate Planning, Tax Planning, and Individual Tax Preparation. In addition, Business Planning, Business Tax Returns, and Bookkeeping (business) services are included. Systems and software are provided to help you Organize, Structure, and Streamline your finances.

Specific portfolio recommendations and their implementation are dependent upon the Client Investment Policy Statement which outlines each Client's current situation (income, tax levels, and risk tolerance levels) and is used to construct a Client specific investment allocation to aid in the selection of a portfolio that matches restrictions, needs, and targets. Clients can impose restrictions on investing in certain asset classes when using Betterment as the third party investment manager, however they cannot impose restrictions on the specific funds or underlying securities within those asset classes. As we do not currently engage with any other third party investment manager, clients can not impose restrictions on the selection of third party investment managers. The only third party investment manager we work with at this time is Betterment as discussed above.





## Pomegranate Financial Membership

The following benefits are provided:

- (4) Thirty minute meetings are provided over the course of 12 consecutive months
- Monthly Pomegranate Financial Planning & Investment Newsletters
- Educational Content & Resources
- Access to financial planning software

The current fee is \$600 spread over 12 months to equal \$50/month. (4) 30 minute meetings are provided over the course of 12 months.

Each meeting will consist of a pre-meeting email asking what topics and/or questions the member would like to review or ask. The pre-meeting email will be provided before each meeting by the CFP®/EA to provide an agenda, clarify questions or topics, and confirm any other questions

A previous tax return is at times requested prior to the first meeting for the CFP®/EA for review. The CFP®/EA will reach out if they do not have the tax return.

The CFP®/EA will be prepared to answer the questions/review the topics requested.

The first meeting includes an additional 15 minutes to set up the financial planning software for the member. The full financials will not be connected at that time, but will be requested that the member continue linking accounts after the meeting.

The member will notify the CFP®/EA after fully connecting the accounts in order to set up the next meeting.

The same format of pre-emails like the first meeting will be followed. However, the CFP®/EA will prioritize financial insights to help the member enhance their financial well being. Tax planning is often the first priority.

Updated financial data in the software is required to be followed in order to confirm a meeting with the CFP®/EA.

After the 2nd meeting, the next meeting will be set up as prioritized by the member and planner.

The (4) meetings could occur within a month or over a period of 12 months. Other benefits will continue for the full 12 months unless a member cancels their subscription. A member may cancel their subscription at any time, but refunds are not provided. Each meeting is valued at \$150. Therefore if a member cancels after a # of meetings, but has only paid for less than the value of the meeting(s), payment will be required. For example, a member begins their membership and has paid for one month: \$50. The member meets the CFP®/EA in that month, and consequently cancels the membership. The member will owe an additional \$100 as the meeting is valued at \$150.

The CFP®/EA retains all authority to cancel a membership at their discretion.

If the member decides to engage with Planner for Comprehensive Financial Planning and/or Investment Management - then the membership can be canceled without a refund and a new separate agreement will be provided.



## Wrap Fee Programs

PF does not participate in a wrap fee program.

Betterment as a third party investment manager operates their own wrap fee program, which will be disclosed under their agreement between Betterment and the client.

# Item 5: Fees and Compensation

Please note, unless a Client has received the firm's Disclosure Brochure at least 48 hours prior to signing the investment advisory contract, the investment advisory contract may be terminated by the Client within five (5) business days of signing the contract without incurring any advisory fees. How we are paid depends on the type of advisory service we are performing. Please review the fee and compensation information below.

## Investment Management using Betterment

An upfront onboarding fee will be assessed for all new clients engaging with PF for Investment Management Services to review the Client's objectives and investment portfolio, followed by an annual fee as outlined below:

Account Value	Upfront Onboarding Fee*	Annual / Quarterly Fee Charged by PF	Annual Fee Charged by Betterment
\$0 - \$15,000	\$150	\$0 / \$0	0.15%
\$15,000 - \$100M		\$150 / \$37.50	
\$100M - \$500M	\$300	\$300 / \$75	
\$500M - \$2MM	\$600	\$600 / \$150	
\$2MM - \$10MM			
\$10MM - \$30MM			
\$30MM - \$100MM			0.14%
\$100MM and above			0.12%

\*Upfront Onboarding Fee may be waived if a client signs up for Premier Financial Planning or Personal CFO service or Basic Financial Planning.

Fees for the upfront onboarding portion of the service may be paid by electronic funds transfer or check. For upfront onboarding fees paid by electronic funds transfer, we use an independent 3rd party payment processor in which the client can securely input their banking information and pay their fee. We do not have access to the client's banking information at any time. The client will be provided with their own secure portal in order to make payments.



The annual advisory fee is tiered, prorated and paid in arrears on a quarterly basis.

Betterment will debit the Client’s account for both Betterment’s fee and PF’s annual advisory fee, and will remit PF’s fee to PF. The fees charged by PF and Betterment are not negotiable, and no increase in the annual fee shall be effective without agreement from the Client by signing a new agreement or amendment to their current advisory agreement.

Accounts initiated or terminated during a calendar quarter will be charged a prorated fee based on the amount of time remaining in the billing period. This service may be terminated at any time with written notification to the advisor. Since fees are paid in arrears, no refund will be needed upon termination of the account. Total advisory fees charged by PF and Outside Manager will not exceed 2% of assets under management per year.

### Comprehensive Ongoing Financial Planning

A Service Calendar will be customized according to each client's financial situation, and will outline topics to be covered by the advisor and Client throughout the year. PF will review Client’s financial plan, provide ongoing advice and be available as needed by clients or circumstances through the duration of the engagement. Clients may select from either Basic Financial Planning, Premier Financial Planning, or Personal CFO as outlined in the table below:

	<b>Basic Financial Planning: \$1,650 Semi-Annual Fee</b>	<b>Premier Financial Planning: \$2,760 Annual Fee</b>	<b>Personal CFO: \$4,500 Annual Fee</b>
<b>Monthly Fee</b>	\$275	\$230	\$375
<b>Services</b>	Net Worth Cash Flow Insurance Credit Employee Benefits Retirement Planning Education Planning Debt Management Estate Planning	*Basic FP Services Tax Planning Individual Tax Preparation	*Premier FP Services Business Planning Business Tax Preparation Bookkeeping
<b># of Meetings per Month</b>	6 Month Contract Unlimited Meetings	12 Month Contract Unlimited Meetings	12 Month Contract Unlimited Meetings



The monthly fee will be charged in arrears. The client may terminate the engagement at any time and no refunds will be made upon termination. An invoice will be provided to the client at the end of each month of engagement outlining the hours and services provided.

The fee will be agreed upon before the start of any work and is not negotiable. This service may be terminated at any time with written notification to the advisor. Since fees are paid in arrears, no refund will be needed upon termination of the account.

Discounts can be made to the Financial Planning Fees. For example, a discount could be applied at the beginning of the year for any prospect who signs an agreement in the month of January. The discounts range between 0% - 20% and are offered for a temporary period of time. The discount will be made known in the agreement and on the website in bold and apply to all prospects who sign during the discount period. Discounts are not negotiable.

Fees for this service may be paid by electronic funds transfer or check.

**Project-Based: Hourly Financial Planning**

We provide hourly financial planning services at the rate of \$200 per hour.

The fee is not negotiable and is due at the completion of the engagement. In the event of early termination by the Client, any fees for the hours already worked will be due. Fees for this service may be paid by electronic funds transfer or check. If during the engagement of hourly financial planning the Client decides to engage the planner for One-Time Financial Planning, fees may be applied to the One-Time Financial Planning fee.

**Tax Preparation & Bookkeeping**

The fee for individual tax preparation is included in the Premier Financial Planning & Personal CFO services. Business tax preparation and Bookkeeping is included in the Personal CFO services. The service is provided by DJAS licensed tax preparers who will bill PF directly for the services rendered. PF pays DJAS for these services and clients will not be billed separately for these services from DJAS.

**Educational Seminars and Speaking Engagements**

Seminars are offered to organizations and the public on a variety of financial topics. Fees range from \$0 to \$10,000 per seminar or \$0 to \$200 per participant and are due at the conclusion of the seminar. The fee range is based on the content, amount of research conducted, the number of hours of preparation needed, and the number of attendees.

**Pomegranate Financial Membership**

Membership	Membership Fee
Monthly Fee	\$50 for 12 Consecutive Months
Services	<ul style="list-style-type: none"> <li>(4) 30 Minute Meetings with a CFP®/EA</li> </ul>



	<ul style="list-style-type: none"> <li>• Monthly Pomegranate Financial &amp; Investment Newsletters</li> <li>• Educational Content &amp; Resources</li> <li>• Access to financial planning software</li> </ul>
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**Other Types of Fees and Expenses**

Our fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which may be incurred by the Client. Clients may incur certain charges imposed by custodians, brokers, and other third parties such as custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer, and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual fund and exchange-traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees, and commissions are exclusive of and in addition to our fee, and we shall not receive any portion of these commissions, fees, and costs.

Item 12 further describes the factors that we consider in selecting or recommending broker-dealers for Client’s transactions and determining the reasonableness of their compensation (e.g., commissions).

We do not receive commissions, economic benefit, incentives or compensation for the sale of securities, insurance products or other investment products including asset-based sales charges or service fees from the sale of mutual funds.

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

We do not offer performance-based fees and do not engage in side-by-side management.

## Item 7: Types of Clients

We provide financial planning and portfolio management services to any and all individuals, high net-worth individuals, charitable organizations and corporations or other businesses.

We do not have a minimum account size requirement.

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

Our primary methods of investment analysis are fundamental, technical and cyclical.



**Fundamental analysis** involves analyzing individual companies and their industry groups, such as a company's financial statements, details regarding the company's product line, the experience, and expertise of the company's management, and the outlook for the company's industry. The resulting data is used to measure the true value of the company's stock compared to the current market value. The risk of fundamental analysis is that the information obtained may be incorrect and the analysis may not provide an accurate estimate of earnings, which may be the basis for a stock's value. If securities prices adjust rapidly to new information, utilizing fundamental analysis may not result in favorable performance.

**Technical analysis** involves using chart patterns, momentum, volume, and relative strength in an effort to pick sectors that may outperform market indices. However, there is no assurance of accurate forecasts or that trends will develop in the markets we follow. In the past, there have been periods without discernible trends and similar periods will presumably occur in the future. Even where major trends develop, outside factors like government intervention could potentially shorten them.

Furthermore, one limitation of technical analysis is that it requires price movement data, which can translate into price trends sufficient to dictate a market entry or exit decision. In a trendless or erratic market, a technical method may fail to identify trends requiring action. In addition, technical methods may overreact to minor price movements, establishing positions contrary to overall price trends, which may result in losses. Finally, a technical trading method may underperform other trading methods when fundamental factors dominate price moves within a given market.

**Cyclical analysis** is a type of technical analysis that involves evaluating recurring price patterns and trends based upon business cycles. Economic/business cycles may not be predictable and may have many fluctuations between long-term expansions and contractions. The lengths of economic cycles may be difficult to predict with accuracy and therefore the risk of cyclical analysis is the difficulty in predicting economic trends and consequently the changing value of securities that would be affected by these changing trends.

**Use of Outside Managers:** We utilize MTG, LLC "Betterment Securities" for portfolio management services. When clients wish to engage with PF for investment management services we will explain the use of Betterment as a third party investment manager as discussed in Item 4 above. We periodically review and analyze third party money manager options by examining their expertise, investment philosophies, and past performance of the third party managers in an attempt to determine if that portfolio management solution has demonstrated an ability to invest over a period of time and in different economic conditions. We monitor the assets allocation approach and underlying holdings, strategies, concentrations, and leverage as part of our overall periodic risk assessment. Additionally, as part of our due diligence process, we survey the manager's compliance and business enterprise risks. A risk of investing with a third party manager who has been successful in the past is that he or she may not be able to replicate that success in the future. In addition, we do not control the underlying investments in a third party manager's portfolio options. There is also a risk that a manager may deviate from the stated investment mandate or strategy of the portfolio, making it a less suitable investment for our Clients. Moreover, as we do not control the manager's daily business and compliance operations, we may be unaware of the lack of internal controls necessary to prevent business, regulatory or reputational deficiencies. By only using one third party manager, we limit the client's ability to engage with multiple third party investment managers and we will take that into account when assessing future investment management programs.

## **Passive Investment Management**



We primarily practice passive investment management. Passive investing involves building portfolios that are comprised of various distinct asset classes. The asset classes are weighted in a manner to achieve the desired relationship between correlation, risk, and return. Funds that passively capture the returns of the desired asset classes are placed in the portfolio. The funds that are used to build passive portfolios are typically index mutual funds or exchange-traded funds.

Passive investment management is characterized by low portfolio expenses (i.e. the funds inside the portfolio have low internal costs), minimal trading costs (due to infrequent trading activity), and relative tax efficiency (because the funds inside the portfolio are tax efficient and turnover inside the portfolio is minimal).

In contrast, active management involves a single manager or managers who employ some method, strategy or technique to construct a portfolio that is intended to generate returns that are greater than the broader market or a designated benchmark. Academic research indicates most active managers underperform the market.

## **Material Risks Involved**

**All investing strategies we offer involve risk and may result in a loss of your original investment which you should be prepared to bear.** Many of these risks apply equally to stocks, bonds, commodities, and any other investment or security. Material risks associated with our investment strategies are listed below.

**Market Risk:** Market risk involves the possibility that an investment's current market value will fall because of a general market decline, reducing the value of the investment regardless of the operational success of the issuer's operations or its financial condition.

**Strategy Risk:** The Adviser's investment strategies and/or investment techniques may not work as intended.

**Small and Medium Cap Company Risk:** Securities of companies with small and medium market capitalizations are often more volatile and less liquid than investments in larger companies. Small and medium cap companies may face a greater risk of business failure, which could increase the volatility of the Client's portfolio.

**Turnover Risk:** At times, the strategy may have a portfolio turnover rate that is higher than other strategies. A high portfolio turnover would result in correspondingly greater brokerage commission expenses and may result in the distribution of additional capital gains for tax purposes. These factors may negatively affect the account's performance.

**Limited markets:** Certain securities may be less liquid (harder to sell or buy) and their prices may at times be more volatile than at other times. Under certain market conditions, we may be unable to sell or liquidate investments at prices we consider reasonable or favorable or find buyers at any price.

**Concentration Risk:** Certain investment strategies focus on particular asset-classes, industries, sectors or types of investment. From time to time these strategies may be subject to greater risks of adverse developments in such areas of focus than a strategy that is more broadly diversified across a wider variety of investments.

**Interest Rate Risk:** Bond (fixed income) prices generally fall when interest rates rise, and the value may fall below par value or the principal investment. The opposite is also generally true: bond prices generally rise when interest rates fall. In general, fixed income securities with longer maturities are more sensitive to these price changes. Most other investments are also sensitive to the level and direction of interest rates.



**Legal or Legislative Risk:** Legislative changes or Court rulings may impact the value of investments, or the securities' claim on the issuer's assets and finances.

**Inflation:** Inflation may erode the buying power of your investment portfolio, even if the dollar value of your investments remains the same.

### **Risks Associated with Securities**

Apart from the general risks outlined above which apply to all types of investments, specific securities may have other risks.

**Commercial Paper** is, in most cases, an unsecured promissory note that is issued with a maturity of 270 days or less. Being unsecured the risk to the investor is that the issuer may default.

**Common stocks** may go up and down in price quite dramatically, and in the event of an issuer's bankruptcy or restructuring could lose all value. A slower-growth or recessionary economic environment could have an adverse effect on the price of all stocks.

**Corporate Bonds** are debt securities to borrow money. Generally, issuers pay investors periodic interest and repay the amount borrowed either periodically during the life of the security and/or at maturity. Alternatively, investors can purchase other debt securities, such as zero coupon bonds, which do not pay current interest, but rather are priced at a discount from their face values and their values accrete over time to face value at maturity. The market prices of debt securities fluctuate depending on factors such as interest rates, credit quality, and maturity. In general, market prices of debt securities decline when interest rates rise and increase when interest rates fall. The longer the time to a bond's maturity, the greater its interest rate risk.

**Bank Obligations** including bonds and certificates of deposit may be vulnerable to setbacks or panics in the banking industry. Banks and other financial institutions are greatly affected by interest rates and may be adversely affected by downturns in the U.S. and foreign economies or changes in banking regulations.

**Municipal Bonds** are debt obligations generally issued to obtain funds for various public purposes, including the construction of public facilities. Municipal bonds pay a lower rate of return than most other types of bonds. However, because of a municipal bond's tax-favored status, investors should compare the relative after-tax return to the after-tax return of other bonds, depending on the investor's tax bracket. Investing in municipal bonds carries the same general risks as investing in bonds in general. Those risks include interest rate risk, reinvestment risk, inflation risk, market risk, call or redemption risk, credit risk, and liquidity and valuation risk.

**Exchange Traded Funds** prices may vary significantly from the Net Asset Value due to market conditions. Certain Exchange Traded Funds may not track underlying benchmarks as expected. ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net asset value; (ii) the ETF may employ an investment strategy that utilizes high leverage ratios; or (iii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are delisted from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. The Adviser has no control over the risks taken by the underlying funds in which the Clients invest.

**Investment Companies Risk.** When a Client invests in open-end mutual funds or ETFs, the Client indirectly bears its proportionate share of any fees and expenses payable directly by those funds. Therefore, the Client will incur higher expenses, many of which may be duplicative. In addition, the Client's overall portfolio may be





affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives).

## Item 9: Disciplinary Information

### **Criminal or Civil Actions**

PF and its management have not been involved in any criminal or civil action.

### **Administrative Enforcement Proceedings**

PF and its management have not been involved in administrative enforcement proceedings.

### **Self-Regulatory Organization Enforcement Proceedings**

PF and its management have not been involved in legal or disciplinary events that are material to a Client's or prospective Client's evaluation of PF or the integrity of its management.

## Item 10: Other Financial Industry Activities and Affiliations

No PF employee is registered, or has an application pending to register, as a broker-dealer or a registered representative of a broker-dealer. No PF employee has any material relationships or arrangements with these types of financial service providers.

No PF employee is registered, or has an application pending to register, as a futures commission merchant, commodity pool operator or a commodity trading advisor. No PF employee has any material relationships or arrangements with these types of financial service providers.

Blake Jones is not affiliated with any insurance companies or agencies. Blake Jones will not sell any insurance products to clients or prospective clients of PF.

Blake Jones is the owner of Pomegranate Taxes Inc. which is an accounting firm. At times, he will refer clients between Pomegranate Financial LLC and Pomegranate Taxes Inc when appropriate but will not receive any compensation in exchange for the referral. Clients are never obligated to use the services of either party recommended to them. He devotes 20 hours per week during market trading hours to this activity.

### **Our Interest in Betterment Securities' Services**

PF has a material relationship with Betterment for Advisors. The availability of these services from Betterment indirectly benefits us because we do not have to produce or purchase them. These services may be contingent upon us committing a certain amount of business to Betterment Securities in assets in custody. We may have an incentive to recommend that you maintain your account with Betterment Securities, based on our interest in receiving Betterment For Advisors and Betterment Securities' services that benefit our business rather than based on your interest in receiving the best value in custody services and the most favorable execution of your



transactions. This is a potential conflict of interest. We believe, however, that our selection of Betterment Securities as custodian and broker is in the best interests of our Clients. Our selection is primarily supported by the scope, quality, and price of Betterment Securities' services and not Betterment For Advisors and Betterment Securities' services that benefit only us.

### **Recommendations or Selections of Other Investment Advisers**

As referenced in Item 4 of this brochure, PF recommends Clients to Outside Managers to manage their accounts. We do not receive a portion of the advisory fee charged by the outside manager as outlined in Item 5. PF's fee is a flat fee and is not based on a percentage of assets under management. You are not obligated, contractually or otherwise, to use the services of any Outside Manager we recommend. Additionally, PF will only recommend an Outside Manager who is properly licensed or registered as an investment adviser.

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

As a fiduciary, our firm and its associates have a duty of utmost good faith to act solely in the best interests of each Client. Our Clients entrust us with their funds and personal information, which in turn places a high standard on our conduct and integrity. Our fiduciary duty is a core aspect of our Code of Ethics and represents the expected basis of all of our dealings. The firm also accepts the obligation not only to comply with the mandates and requirements of all applicable laws and regulations but also to take responsibility to act in an ethical and professionally responsible manner in all professional services and activities.

### **Code of Ethics Description**

This code does not attempt to identify all possible conflicts of interest, and literal compliance with each of its specific provisions will not shield associated persons from liability for personal trading or other conduct that violates a fiduciary duty to advisory Clients. A summary of the Code of Ethics' Principles is outlined below.

- Integrity - Associated persons shall offer and provide professional services with integrity.
- Objectivity - Associated persons shall be objective in providing professional services to Clients.
- Competence - Associated persons shall provide services to Clients competently and maintain the necessary knowledge and skill to continue to do so in those areas in which they are engaged.
- Fairness - Associated persons shall perform professional services in a manner that is fair and reasonable to Clients, principals, partners, and employers, and shall disclose conflict(s) of interest in providing such services.



- Confidentiality - Associated persons shall not disclose confidential Client information without the specific consent of the Client unless in response to proper legal process, or as required by law.
- Professionalism - Associated persons' conduct in all matters shall reflect the credit of the profession.
- Diligence - Associated persons shall act diligently in providing professional services.

We periodically review and amend our Code of Ethics to ensure that it remains current, and we require all firm access persons to attest to their understanding of and adherence to the Code of Ethics at least annually. Our firm will provide a copy of its Code of Ethics to any Client or prospective Client upon request.

### **Investment Recommendations Involving a Material Financial Interest and Conflicts of Interest**

Neither our firm, its associates or any related person is authorized to recommend to a Client or effect a transaction for a Client, involving any security in which our firm or a related person has a material financial interest, such as in the capacity as an underwriter, adviser to the issuer, etc.

### **Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest**

Our firm and its “related persons” do not invest in the same securities, or related securities, e.g., warrants, options or futures, which we recommend to Clients.

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

Because our firm and its “related persons” do not invest in the same securities, or related securities, e.g., warrants, options or futures, which we recommend to Clients, we do not trade in securities at or around the same time as Clients.

## **Item 12: Brokerage Practices**

### **Factors Used to Select Custodians and/or Broker-Dealers**

Pomegranate Financial LLC does not have any affiliation with Broker-Dealers. Specific custodian recommendations are made to the Client based on their need for such services. We recommend custodians based on the reputation and services provided by the firm.

#### **1. Research and Other Soft-Dollar Benefits**

We currently receive soft dollar benefits by nature of our relationship with MTG, LLC dba Betterment Securities (“Betterment Securities”).

#### **2. Brokerage for Client Referrals**

We receive no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

#### **3. Clients Directing Which Broker/Dealer/Custodian to Use**

We do recommend a specific custodian for Clients to use, however, Clients may custody their assets at a custodian of their choice. Clients may also direct us to use a specific broker-dealer to execute transactions. By allowing Clients to choose a specific custodian, we may be unable to achieve the most favorable execution of Client transactions and this may cost Clients money over using a lower-cost custodian.



## **The Custodian and Brokers We Use (Betterment)**

PF does not maintain custody of your assets that we manage, although we may be deemed to have custody of your assets if you give us the authority to withdraw advisory fees from your account (see Item 15—Custody, below). Your assets must be maintained in an account at a "qualified custodian," generally a broker-dealer or bank. We may recommend that our Clients use MTG, LLC dba Betterment Securities ("Betterment Securities"), a registered broker-dealer, member SIPC, as the qualified custodian. We are independently owned and operated and are not affiliated with Betterment Securities. Betterment Securities will hold your assets in a brokerage account and buy and sell securities when we and/or you instruct them to. While we may recommend that you use Betterment Securities as custodian/broker, you will decide whether to do so and will open your account with Betterment Securities by entering into an account agreement directly with them. We do not open the account for you, although we may assist you in doing so. If you do not wish to place your assets with Betterment Securities, then we cannot manage your account on Betterment For Advisors (defined below).

## **Your Brokerage and Custody Costs**

For our Clients' accounts that Betterment Securities maintains, Betterment Securities generally does not charge you separately for custody services but is compensated as part of the Betterment For Advisors (defined below) platform fee, which is a percentage of the dollar amount of assets in the account in lieu of commissions. We have determined that having Betterment Securities execute trades is consistent with our duty to seek "best execution" of your trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above (see "Factors Used to Select Custodians and/or Broker-Dealers").

## **Services Available to Us via Betterment For Advisors**

Betterment Securities serves as broker-dealer to Betterment For Advisors, an investment and advice platform serving independent investment advisory firms like us ("Betterment For Advisors"). Betterment For Advisors also makes available various support services which may not be available to Betterment's retail customers. Some of those services help us manage or administer our Clients' accounts, while others help us manage and grow our business. Betterment For Advisors' support services are generally available on an unsolicited basis (we don't have to request them) and at no charge to us. Following is a more detailed description of Betterment For Advisors' support services:

1. **SERVICES THAT BENEFIT YOU.** Betterment For Advisors includes access to a range of investment products, execution of securities transactions, and custody of Client assets through Betterment Securities. Betterment Securities' services described in this paragraph generally benefit you and your account.
2. **SERVICES THAT MAY NOT DIRECTLY BENEFIT YOU.** Betterment For Advisors also makes available to us other products and services that benefit us, but may not directly benefit you or your account. These products and services assist us in managing and administering our Clients' accounts, such as software and technology that may:
  - a. Assist with back-office functions, recordkeeping, and Client reporting of our Clients' accounts.



- b. Provide access to Client account data (such as duplicate trade confirmations and account statements).
  - c. Provide pricing and other market data.
  - d. Assist with back-office functions, recordkeeping, and Client reporting.
3. SERVICES THAT GENERALLY BENEFIT ONLY US. By using Betterment For Advisors, we will be offered other services intended to help us manage and further develop our business enterprise. These services include:
- a. Educational conferences and events.
  - b. Consulting on technology, compliance, legal, and business needs.
  - c. Publications and conferences on practice management and business succession.

### **Our Interest in Betterment Securities' Services**

The availability of these services from Betterment For Advisors benefits us because we do not have to produce or purchase them. In addition, we don't have to pay for Betterment Securities' services. These services may be contingent upon us committing a certain amount of business to Betterment Securities in assets in custody. We may have an incentive to recommend that you maintain your account with Betterment Securities, based on our interest in receiving Betterment For Advisors and Betterment Securities' services that benefit our business rather than based on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a potential conflict of interest. We believe, however, that our selection of Betterment Securities as custodian and broker is in the best interests of our Clients. Our selection is primarily supported by the scope, quality, and price of Betterment Securities' services and not Betterment For Advisors and Betterment Securities' services that benefit only us.

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

Betterment may block client trades at their discretion. Their specific practices will be outlined in the agreement signed between Betterment and the client.

## **Item 13: Review of Accounts**

Client accounts with the Investment Management Service will be reviewed regularly on a quarterly basis by Blake Jones, President and CCO. The account is reviewed with regards to the Client's investment policies and risk tolerance levels. Events that may trigger a special review would be unusual performance, addition or deletions of Client imposed restrictions, excessive draw-down, volatility in performance, or buy and sell decisions from the firm or per Client's needs. PF does not perform periodic reviews of client accounts and financial plans unless specifically required by the client. Such reviews will be subject to the hourly rate as outlined in Item 5.

Clients will receive trade confirmations from the broker(s) for each transaction in their accounts as well as monthly or quarterly statements and annual tax reporting statements from their custodian showing all activity in the accounts, such as receipt of dividends and interest.



PF will provide written reports to Investment Advisory Clients on a quarterly basis. The report will contain information on the holdings and performance of the account. We urge Clients to compare these reports against the account statements they receive from their custodian.

## Item 14: Client Referrals and Other Compensation

We receive a non-economic benefit from Betterment For Advisors and Betterment Securities in the form of the support products and services it makes available to us and other independent investment advisors whose Clients maintain their accounts at Betterment Securities. These products and services, how they benefit us, and the related conflicts of interest are described above (see Item 12—Brokerage Practices). The availability to us of Betterment For Advisors and Betterment Securities' products and services is not based on us giving particular investment advice, such as buying particular securities for our Clients.

## Item 15: Custody

PF does not accept custody of Client funds except in the instance of withdrawing Client fees.

For Client accounts in which PF directly debits their advisory fee:

- i. PF will send a copy of its invoice to the custodian at the same time that it sends the Client a copy.
- ii. The custodian will send at least quarterly statements to the Client showing all disbursements for the account, including the amount of the advisory fee.
- iii. The Client will provide written authorization to PF, permitting them to be paid directly for their accounts held by the custodian.

Clients should receive at least quarterly statements from the broker-dealer, bank or other qualified custodian that holds and maintains Client's investment assets. We urge you to carefully review such statements and compare such official custodial records to the account statements or reports that we may provide to you. Our statements or reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

## Item 16: Investment Discretion

We use Outside Managers for investment management, and therefore do exercise discretion. We do not select third-party money managers on a discretionary basis.



## Item 17: Voting Client Securities

We do not vote Client proxies. Therefore, Clients maintain exclusive responsibility for: (1) voting proxies, and (2) acting on corporate actions pertaining to the Client's investment assets. The Client shall instruct the Client's qualified custodian to forward to the Client copies of all proxies and shareholder communications relating to the Client's investment assets. If the Client would like our opinion on a particular proxy vote, they may contact us at the number listed on the cover of this brochure.

In most cases, you will receive proxy materials directly from the account custodian. However, in the event we were to receive any written or electronic proxy materials, we would forward them directly to you by mail, unless you have authorized our firm to contact you by electronic mail, in which case, we would forward you any electronic solicitation to vote proxies.

## Item 18: Financial Information

Registered Investment Advisers are required in this Item to provide you with certain financial information or disclosures about our financial condition. We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to Clients, and we have not been the subject of a bankruptcy proceeding.

## Item 19: Requirements for State-Registered Advisers

### **Blake Jones**

Born: 1991

### **Educational Background**

- 2015 – International Relations, Brigham Young University

### **Business Experience**

- 10/2020 - Present, Presidential Card Game Inc, President
- 04/2020 - Present, Pomegranate Financial LLC, President and CCO
- 02/2020 - Present, Pomegranate Taxes Inc., Tax Preparer
- 10/2017 – 02/2020, US Bank, Wealth Management Banker
- 02/2016 – 10/2017, Travis Vongsawad Northwestern Mutual, Wealth Management Associate



- 08/2014 – 01/2016, Northwestern Mutual, Financial Representative
- 08/2012 – 04/2015, Brigham Young University, Student
- 06/2014 – 07/2014, European American Chamber of Commerce, Intern- International Liaison
- 10/2012 – 05/2014, BYU: Plant and Wildlife Sciences Department, Office Specialist
- 09/2012 – 01/2013, BYU: Computer Science Department, Research Assistant
- 06/2010 – 08/2012, Unemployed
- 08/2009 – 05/2010, Brigham Young University, Student

## **Professional Designations, Licensing & Exams**

**Series 6** - Investment Company Products/Variable Contracts Examination

**Series 63** - Uniform Securities Agent State Law Examination

**Series 65** - Uniform Investment Adviser Law Examination

**EA** - Enrolled Agent

**CFP®** - Certified Financial Planner

**CBDA** - Certified in Blockchain & Digital Assets

## **Other Business Activities**

Blake Jones is currently employed as a Tax Preparer at Pomegranate Taxes Inc. This activity accounts for approximately 40% of his time, 20 hours per week during market trading hours.

Blake Jones is not affiliated with any insurance companies. Blake Jones will not sell any insurance products to clients or prospective clients of PF.

Blake Jones is currently employed as Owner of Presidential Card Games Inc. This activity accounts for approximately 5 hours per month and no time during trading hours. Clients are not solicited to invest in Presidential Card Games Inc.

## **Performance-Based Fees**

Neither Blake Jones, PF or any supervised persons are compensated by performance-based fees.

## **Material Disciplinary Disclosures**

No management person at Pomegranate Financial LLC has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

## **Material Relationships That Management Persons Have With Issuers of Securities**

Pomegranate Financial LLC, nor Blake Jones, have any relationship or arrangement with issuers of securities, in addition to what is described in Item 10.





## **Additional Compensation**

Blake Jones does not receive any economic benefit from any person, company, or organization, in exchange for providing Clients advisory services through PF.

## **Supervision**

Blake Jones, as President and Chief Compliance Officer of PF, is responsible for supervision. He may be contacted at the phone number on this brochure supplement.

## **Requirements for State Registered Advisers**

Blake Jones has NOT been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.





# Pomegranate Financial

## Refresh & Simplify Your Financial Life

Pomegranate Financial LLC

33 North 800 West  
Springville, Utah, 84663  
(385) 398-4015

Dated January 28th, 2024

Form ADV Part 2B – Brochure Supplement

*For*

**Blake Jones 6328539**

President, and Chief Compliance Officer

This brochure supplement provides information about Blake Jones that supplements the Pomegranate Financial LLC (“PF”) brochure. A copy of that brochure precedes this supplement. Please contact Blake Jones if the PF brochure is not included with this supplement or if you have any questions about the contents of this supplement.

Additional information about Blake Jones is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) which can be found using the identification number 6328539.



# Item 2: Educational Background and Business Experience

## **Blake Jones**

Born: 1991

### **Educational Background**

- 2015 – International Relations, Brigham Young University

### **Business Experience**

- 10/2020 - Present, Presidential Card Games Inc
- 04/2020 – Present, Pomegranate Financial LLC, President and CCO
- 02/2020 - Present, Pomegranate Taxes Inc., Tax Preparer
- 10/2017 – 02/2020, US Bank, Wealth Management Banker
- 02/2016 – 10/2017, Travis Vongsawad Northwestern Mutual, Wealth Management Associate
- 08/2014 – 01/2016, Northwestern Mutual, Financial Representative
- 08/2012 – 04/2015, Brigham Young University, Student
- 06/2014 – 07/2014, European American Chamber of Commerce, Intern- International Liaison
- 10/2012 – 05/2014, BYU: Plant and Wildlife Sciences Department, Office Specialist
- 09/2012 – 01/2013, BYU: Computer Science Department, Research Assistant
- 06/2010 – 08/2012, Unemployed
- 08/2009 – 05/2010, Brigham Young University, Student

### **Professional Designations, Licensing & Exams**

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## Item 3: Disciplinary Information

No management person at Pomegranate Financial LLC has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

## Item 4: Other Business Activities

Blake Jones is currently employed as a Tax Preparer at Pomegranate Taxes Inc. This activity accounts for approximately 40% of his time, 20 hours per week during market trading hours.

Blake Jones is not affiliated with any insurance companies. Blake Jones will not sell any insurance products to clients or prospective clients of PF.

Blake Jones is currently employed as Owner of Presidential Card Games Inc. This activity accounts for approximately 5 hours per month and no time during trading hours. Clients are not solicited to invest in Presidential Card Games Inc.

## Item 5: Additional Compensation

Blake Jones does not receive any economic benefit from any person, company, or organization, in exchange for providing Clients advisory services through PF.

## Item 6: Supervision

Blake Jones, as President and Chief Compliance Officer of PF, is responsible for supervision. He may be contacted at the phone number on this brochure supplement.

## Item 7: Requirements for State Registered Advisers

Blake Jones has NOT been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.

