



paracle

PERSONAL FINANCIAL MANAGEMENT

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Dated 03/15/21

This brochure provides information about the qualifications and business practices of Paracle Advisors, LLC (“Advisor”). If you have any questions about the contents of this brochure, please contact Duane Duim, Chief Compliance Officer, at (206) 466-6200 or compliance@paracle.com. 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.

References herein to about Paracle Advisors, LLC as a “registered investment adviser” or any reference to being “registered” does not imply a certain level of skill or training.

Additional information about Paracle Advisors, LLC also is available on the SEC’s website at www.adviserinfo.sec.gov. SEC File Number 801-63993

Item 2 • Material Changes

This updates our last brochure dated November 4, 2020 and updates our assets under management.

Pursuant to new SEC and state rules, we will ensure that you receive a summary of any materials changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year. We may further provide other ongoing disclosure information about material changes as necessary.

If you would like additional information please contact us at www.paracle.com or (206) 466-6200, or through the SEC's website at www.adviserinfo.sec.gov.

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Item 4 • Advisory Business

Paracle Advisors, LLC (“Advisor”) became registered as an Investment Adviser Firm in February 2004. The Advisor is primarily owned by Elliott J. Brink, Joshua E. Harris, Anne Marie L. Stonich and Duane Duim. As discussed below, the Advisor offers investment advisory services to individuals, business entities, trusts, estates, foundations and charitable organizations. The Advisor may also provide financial planning or related consulting services to its investment advisory clients.

Investment Advisory Services

The client can engage the Advisor through its Investment Advisor Representatives (“Representatives”) to provide discretionary investment advisory services on a *fee-only* basis. The Advisor’s annual investment advisory fee (“Fee”) is based upon a percentage (%) of the market value of the assets placed under the Advisor’s management or on a flat annual fee, which is fully described in the written client agreement (“Agreement”) signed between client and Advisor.

The Advisor’s Fee shall include investment advisory services, on-going financial planning and consulting services.

Intelligent Portfolios

Advisor may also provide portfolio management services through an automated investment program called Intelligent Portfolio (“IP”). IP is offered through Institutional Intelligent Portfolios™, an automated online investment management platform sponsored by Performance Technologies, Inc. d/b/a Schwab Performance Technologies. (“SPT”). Through IP, clients are offered a range of investment strategies that are constructed and managed, each consisting of a portfolio of exchange traded funds (“ETFs”) and a cash allocation. The client’s portfolio is held in a brokerage account established with Charles Schwab & Co., Inc. (“Schwab”). Advisor is independent of and not owned by, affiliated with, or sponsored or supervised by SPT, Schwab or their affiliates. More details of this program are described in the SPT Institutional Intelligent Portfolios™ Disclosure Brochure (“Program Brochure”), which is delivered to clients by SPT during the online enrollment process.

Advisor has contracted with SPT to provide us the technology platform and related trading and account management services for IP. This platform enables Advisor to make IP available to clients online and includes a system that automates certain key parts of Advisors investment process (“System”). The System includes an online questionnaire that assist clients to determine their investment objectives and risk tolerance. Clients should note that Advisor will recommend a portfolio via the System. The client may then indicate an interest in a portfolio that is recommended based on their response to the questionnaire. The System also includes an automated investment engine through manages the client’s portfolio on an ongoing basis through automatic rebalancing and tax-loss harvesting (if the client is eligible and elects the same).

The only fees Advisor receives are noted in Item 5—Fees and Compensation and Advisor does not receive any fees from SPT or Schwab for assets in IP, nor does Advisor pay any fees to Schwab or SPT for utilization of the IP platform. However, if Advisor was to maintain less than \$100 million in client assets at Schwab the Advisor would have to pay a fee of 0.10% (10 basis points) on the IP assets. It is important to know that the IP is a completely automated investment program and does not include specific personal financial advice or specific investment recommendations based on your investment objectives.

Limited Consulting/Implementation Services

The Advisor *may* provide limited consultation services to its investment management clients on investment and non-investment related matters, such as estate planning, tax planning, insurance, etc. The client retains absolute discretion over all such implementation decisions and is free to accept or reject any recommendation from the Advisor. Neither the Advisor, nor any of its Representatives, serves as an attorney, or licensed insurance agent, and no portion of the Advisor’s services should be construed as same.

Please Note: Although Advisor’s Principals, Joshua E. Harris and Anne Marie L. Stonich, in their separate individual capacities are licensed as Certified Public Accountants, Mr. Harris and Ms. Stonich do not provide accounting services to any of the Advisor’s clients, and no corresponding CPA-client relationship is established by engaging Advisor.

To the extent requested by a client, the Advisor may recommend the services of other professionals for certain non-investment implementation purposes (i.e. attorneys, accountants, insurance, etc.). The client is under no obligation to engage the services of any such recommended professional.

Please Note: If the client engages any such recommended professional, and a dispute arises thereafter relative to such engagement, the client agrees to seek recourse exclusively from and against the engaged professional.

Private Investment Funds

Advisor may provide investment advice regarding private investment funds. The Advisor's role relative to the private investment funds shall be limited to its initial due diligence and investment monitoring services. If a client determines to become a private fund investor the value used by the Advisor to calculate its fee will be either the initial purchase, cumulative contributions or the most recent valuation provided by the fund sponsor. Considering the illiquidity of these investments it is very important to know that the liquidation value of these positions could be significantly more or less than the original purchase price or value as being reported. If fund sponsor does not provide a valuation, Advisor will use the amount of assets client has invested in the fund(s) for calculating its fee. Advisor's clients are under absolutely no obligation to consider or make an investment in a private investment fund(s).

Please Note: Private investment funds generally involve various risk factors, including, but not limited to, potential for complete loss of principal, liquidity constraints and lack of transparency, a complete discussion of which is set forth in each fund's offering documents, which will be provided to each client for review and consideration. Unlike other liquid investments that a client may maintain, private investment funds do not provide daily liquidity or pricing. Each prospective client investor will be required to complete a Subscription Agreement, pursuant to which the client shall establish that he/she is qualified for investment in the fund, and acknowledges and accepts the various risk factors that are associated with such an investment.

Sub-Advisory Arrangements

The Advisor may engage sub-advisors ("Sub-advisors") for the purpose of assisting the Advisor with the management of its client accounts. The Sub-advisor(s) shall have discretionary authority for the day-to-day management of the assets that are allocated to it by the Advisor. The Sub-advisor shall continue in such capacity until such arrangement is terminated or modified by the client or Advisor. Sub-advisor fees will be determined by a separate agreement between the client and Sub-advisor and are in addition to Advisor's Fee.

Client Obligations

In performing its services, Advisor shall not be required to verify any information received from the client or from the client's other professionals, and is expressly authorized to rely thereon. Moreover, each client is advised that it remains the responsibility of the client to promptly notify the Advisor of any change in their financial situation or investment objectives for the purpose of reviewing/evaluating/revising Advisor's previous recommendations and/or services.

Disclosure Statement

A copy of this Brochure (Part 2A of Form ADV) will be provided at the time the Client executes the Agreement. Any client shall have five business days subsequent to executing the Agreement to terminate the Advisor's services without penalty.

The Advisor shall provide investment advisory services specific to the needs of each client. Prior to providing investment advisory services, an investment adviser representative will ascertain each client's investment objective(s). Thereafter, the Advisor shall allocate and/or recommend that the client allocate investment assets consistent with the designated investment objective(s). The client may, at any time, impose reasonable restrictions, in writing, on the Advisor's services.

As of December 31, 2020, the Advisor had \$1,404,742,363 in assets under management on a discretionary basis and \$5,131,624 in assets managed on a non-discretionary basis.

Item 5 • Fees and Compensation

Investment Advisory Services

If a client engages the Advisor to provide discretionary investment advisory services on a fee-only basis, the Advisor's annual Fee shall be either a flat fee or based upon a percentage (%) of the market value and type of assets placed under the Advisor's management (between 0.25% and 1.00%). Fees will be charged from the date the Agreement is signed and will continue until terminated by either party. The standard fee schedule is noted below but it is possible that a different schedule could be applied. Client should refer to the Agreement for the fee rate for their accounts.

Annual Fee	Managed Assets
1.00%	the first \$1,000,000, plus
0.75%	the next \$4,000,000, plus
0.50%	the next \$5,000,000, plus
0.25%	for amounts greater than \$10,000,000

Advisor's annual Fee shall include investment advisory services, and financial planning and consulting services. In the event that the client requires extraordinary planning and/or consultation services (to be determined in the sole discretion of the Advisor), the Advisor may determine to charge for such additional services, the dollar amount of which shall be set forth in a separate written notice to the client. Clients may elect to have the Advisor's advisory fees deducted directly from their account. Both Advisor's Agreement and the custodial/clearing agreement may authorize the custodian to debit the account for the amount of the Advisor's Fee and to directly remit the Fee to the Advisor in compliance with regulatory procedures. In the unlikely event that the Advisor bills the client directly, payment is due upon receipt of the Advisor's invoice.

The Advisor bills their Fee in advance for every three-month period. The Fee will be calculated using the value at the beginning of that three-month billing period and the value used will include all positions in the account(s), cash, declared and paid dividends, accrued income and interest payments, unless specifically excluded or restricted from billing in writing by the client.

The Advisor generally requires a quarterly minimum fee of \$2,500 for investment advisory services. The Advisor, in its sole discretion, may charge a lesser Fee and/or reduce or waive its minimum quarterly fee requirement based upon certain criteria (i.e. anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, negotiations with client, etc.).

Unless the client directs otherwise, the Advisor will generally recommend that Charles Schwab and Co., Inc. ("*Schwab*") and/or Fidelity Investments ("*Fidelity*") serve as the broker-dealer/custodian ("*Custodian*") for client assets. All Custodians charge transaction fees for effecting certain securities transactions (i.e. transaction fees for certain no-load mutual funds, individual equity and fixed income securities transactions, etc.). In addition to Advisor's Fee, and transaction fees, clients will also incur, relative to all mutual fund and exchange traded fund purchases, charges imposed at the fund level (e.g. management fees and other fund expenses). Accordingly, client should review the fees charged by the investments, Custodian(s), Sub-Advisors and the Advisor to fully understand the total amount of the fees being paid. Additionally, the investments selected for the clients are not exclusively available to the Advisor and could be obtained through other unaffiliated firms and potentially at a lower fee.

When beneficial to the client, individual fixed-income and/or equity transactions may be effected through broker-dealers with whom Advisor, Sub-advisor and/or the client have entered into arrangements for prime brokerage clearing services. This could include affecting certain client transactions through other SEC registered and FINRA member broker-dealers, in which event, the client generally will incur both the transaction fee charged by the executing broker-dealer and a "tradeaway" fee charged by the Custodian.

The Agreement between the Advisor and the client will continue in effect until terminated by either party by written notice in accordance with the terms of the Agreement. Upon termination, the Advisor shall refund the pro-rated portion of the advanced advisory Fee paid based upon the number of days remaining in the billed period.

Item 6 • Performance-Based Fees and Side-by-Side Management

Neither the Advisor nor any supervised person of the Advisor charge performance-based fees.

Item 7 • Types of Clients

The Advisor's clients shall generally include individuals, business entities, trusts, estates and charitable organizations. The Advisor generally requires a quarterly minimum fee of \$2,500 for investment advisory services. As noted earlier, the Advisor may charge a lesser investment management fee and/or reduce or waive its minimum quarterly fee requirement.

Item 8 • Methods of Analysis, Investment Strategies and Risk of Loss

The Advisor may utilize the following methods of security analysis:

- Fundamental - (analysis performed on historical and present data, with the goal of making financial forecasts)
- Technical – (analysis performed on historical and present data, focusing on price and trade volume, to forecast the direction of prices)

The Advisor may utilize the following investment strategies when implementing investment advice given to clients:

- Long Term Purchases (securities held at least a year)
- Short Term Purchases (securities sold within a year)
- Trading (securities sold within thirty (30) days)

Please Note: Investment Risk: Different types of investments involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy (including the investments and/or investment strategies recommended or undertaken by the Advisor) will be profitable or equal any specific performance level(s).

The Advisor's methods of analysis and investment strategies do not present any significant or unusual risks. However, every method of analysis has its own inherent risks. To perform an accurate market analysis the Advisor must have access to current/new market information. The Advisor has no control over the dissemination rate of market information; therefore, unbeknownst to the Advisor, certain analyses may be compiled with outdated market information, severely limiting the value of the Advisor's analysis. Furthermore, an accurate market analysis can only produce a forecast of the direction of market values. There can be no assurances that a forecasted change in market value will materialize into actionable and/or profitable investment opportunities.

The Advisor's primary investment strategies - Long Term Purchases, Short Term Purchases, and Trading - are fundamental investment strategies. However, every investment strategy has its own inherent risks and limitations. For example, longer term investment strategies require a longer investment time period to allow for the strategy to potentially develop. Shorter term investment strategies require a shorter investment time period to potentially develop but, as a result of more frequent trading, may incur higher transactional costs when compared to a longer term investment strategy. Trading, an investment strategy that requires the purchase and sale of securities within a thirty (30) day investment time period, involves a very short investment time period but will incur higher transaction costs when compared to a short term investment strategy and substantially higher transaction costs than a longer term investment strategy. Additionally, higher allocations to cash positions may incur an opportunity cost of earning lower returns on cash while other investments experience higher returns.

Currently, the Advisor and or the Sub-advisor will primarily allocate client investment assets among various individual equity (stocks), debt (bonds) and fixed income securities, mutual funds and/or exchange traded funds, on a discretionary basis in accordance with the client's designated investment objective(s). All Investments have the risk of losing value. Some investments have the risk of defaulting on interest or principle payments. Clients are also faced with the risk that inflation will outpace the returns of some investments, which lowers the purchasing power of that investor. It is important that you understand that there are numerous risks associated with your investments.

Clients should contact their Representative or the Advisor for questions on risk in their accounts.

Item 9 • Disciplinary Information

The Advisor has not been the subject of any disciplinary actions.

Item 10 • Other Financial Industry Activities and Affiliations

The Advisor's sole source of income are advisory fees received for providing investment management services to clients.

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

The Advisor requires that all employees be subject to its Code of Ethics ("Code"), which sets standards of behavior intended to establish a high level of professionalism, integrity and fair dealing with clients. The Code does allow employees to maintain personal securities accounts at any broker-dealer. The Advisor does not require prior review or approval for trades in those accounts. Additionally, employees are allowed to purchase investments for their accounts that are also purchased in client portfolios. This could create a conflict of interest in that the employee could benefit from personal trading using the knowledge gained through their affiliation with the Advisor. The Advisor has created policies and procedures to ensure that employees are not using their position for their own economic advantage. The employees are not allowed to:

- Trade on inside information.
- "Front-run" or trade in anticipation of client transactions.
- Participate, trade or participate in any activity prohibited under the federal securities laws.
- Place their interests in front of clients.

All personal trading is reported to and periodically reviewed by the Advisor. For a copy of the Code please contact Advisor.

Item 12 • Brokerage Practices

All transactions enacted by the Advisor are made through the Custodian selected by the client. The only exception to this would be the "tradeaway" program available at Schwab, which is described fully in Item 5 above. For utilizing the "tradeaway" service the Advisor may receive non-monetary benefits such as research, bond selection or fixed income advice, however any transactions effected through this program are done in an effort to benefit the client.

The Custodian holds the assets and provides the trading and custody platform used by the Advisor. Neither the Advisor nor the Representatives have the authority to determine which brokers or Custodians its clients use to hold their assets or the fees charged by the Custodian. However, for reasons of familiarity and efficiency the Advisor tends to recommend either *Schwab* or *Fidelity* as mentioned above. Factors used to determine which Custodian to recommend include the client's Custodian prior to coming to Advisor, trading costs, electronic access to trading and client accounts, software and/or discounts on software, products and services, compliance, research and technology, marketing assistance, discounted and/or free admission to conferences, meetings and/or educational/social events and other operational support that may benefit the Advisor or Representative, but not the client. This could create a conflict that the recommendation of the Custodian is based on the research and products or services and not based on the Custodian providing the best execution for transactions or platform for client accounts. In all cases the Advisor and Representative must place the interest of the client in front of their own.

Clients investing in Intelligent Portfolios ("IP") will utilize the brokerage services of Schwab. While clients are required to use Schwab as their custodian or broker to enroll in IP, the client decides whether to do so and opens its accounts directly with Schwab by entering into an account agreement directly with them. As described in the Program Brochure, SPT may aggregate purchase and sale orders for ETFs across accounts enrolled in IP, including accounts for clients of other independent investment advisory firms using SPTs program.

It is possible that the Custodian could refer a client to Advisor, although there is no formal plan in place for any such referrals. It is unlikely that the Advisor would allow a client to direct brokerage to a specific broker-dealer. However, if such an arrangement was allowed the Advisor would not be able to ensure best execution or fair commissions for the client. In some cases, the Advisor may aggregate or block trade multiple client accounts. Doing so allows some efficiency in the transactions, although it does not ensure the client will receive a reduction in trading costs or a better execution price than if the trade was enacted separately. It is possible that

rebalancing/trading accounts are done so randomly which could result in clients holding different positions and receiving higher or lower prices than other accounts with similar investment objectives. Neither Advisor nor Representatives receive any soft-dollar benefits. It may be possible for the Representatives to buy or sell securities in their personal accounts that were also purchased in the client account. Advisor has a strict policy against using the trade flow of clients to economically benefit the Representatives, employees or the Advisor.

Item 13 • Review of Accounts

All client accounts are reviewed by one of our Representatives, who are required to have a college degree and/or an advanced industry designation. It is the client's responsibility to advise the Advisor of any changes in their investment objectives and/or financial situation. All clients (in person or via telephone) are encouraged to review financial planning issues (to the extent applicable), investment objectives and account performance with the Advisor on an annual basis.

The Advisor may conduct account reviews more frequently upon the occurrence of a triggering event, such as a change in client investment objectives and/or financial situation, market corrections and/or client requests.

Clients are provided, at least quarterly, with written transaction confirmation notices and regular written summary account statements directly from the Custodian and/or program sponsor for the client accounts. The Advisor may also provide a written periodic report summarizing account activity, billing and performance. The valuation of the accounts in the reports provided by the Advisor may differ slightly from the amount shown on the statement from the Custodian. This potential difference stems from settlement date versus trade date accounting. It is important for the client to rely on the statement provided by the Custodian for the official record of their accounts.

Item 14 • Client Referrals and Other Compensation

As referenced above, the Advisor may receive an indirect economic benefit from the Custodians. The Advisor, without cost (and/or at a discount), may receive support services and/or products from the Custodians. Advisor's clients do not pay more for investment transactions effected and/or assets maintained at the Custodian as a result of this arrangement. There is no corresponding commitment made by the Advisor to the Custodians or any other entity to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as result of the above arrangement. The Advisor does not compensate, directly or indirectly, any person, other than its Representatives, for client referrals.

Item 15 • Custody

The Advisor shall have the ability to have its Fee for each client debited by the Custodian on a three-month rolling basis. Clients are provided, at least quarterly, with written transaction confirmation notices and regular written summary account statements directly from the Custodian and/or program sponsor. As noted above, the Advisor may also provide a written periodic report summarizing account activity, billing and performance, but it is important that the Client rely on the statements from the Custodian for the official record of their assets. The Custodian does not verify the accuracy of the Advisor's Fee calculation. Additionally, Advisor is reporting custody on certain accounts where the client has requested the ability to electronically transfer assets to a third-party (through a standing limited power of attorney). Although, Advisor does not have any relationship, affiliation or share and address with any of the third-parties, Advisor is following SEC guidelines to report having custody of these assets.

Item 16 • Investment Discretion

The client can determine to engage the Advisor to provide investment advisory services on a discretionary basis. Prior to the Advisor assuming discretionary authority over a client's account, the client shall be required to execute an Agreement, naming the Advisor as the client's attorney and agent in fact, granting the Advisor full authority to buy, sell, or otherwise effect investment transactions involving the assets in the client's name found in the discretionary account.

Clients who engage the Advisor on a discretionary basis may, at any time, impose restrictions, in writing, on the Advisor's discretionary authority. (i.e. limit the types/amounts of particular securities purchased for their account, exclude the ability to purchase securities with an inverse relationship to the market, limit or proscribe the Advisor's use of margin, etc.).

Item 17 • Voting Client Securities

The Advisor does not vote client proxies. Clients maintain exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities owned by the client shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the client's investment assets. Clients will receive their proxies or other solicitations directly from their Custodian. Clients may contact the Advisor to discuss any questions they may have with a particular solicitation.

Item 18 • Financial Information

The Advisor does not solicit fees of more than \$1,200, per client, six months or more in advance. The Advisor is unaware of any financial condition that is reasonably likely to impair its ability to meet its contractual commitments relating to its discretionary authority over certain client accounts. The Advisor has not been the subject of a bankruptcy petition.

ANY QUESTIONS: The Advisor's Chief Compliance Officer, Duane Duim, remains available at (206) 466-6200 to address any questions that a client or prospective client may have regarding the above disclosures and arrangements.



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Supplemental Brochure

Elliott J. Brink, CFP®

Dated 11/04/2020

This Brochure supplement provides information about Elliott J. Brink that supplements the Paracle Advisors, LLC (“Advisor”) Brochure. You should have received a copy of that Brochure. Please contact Duane Duim, Chief Compliance Officer if you did not receive the Advisor’s Brochure or if you have any questions about the contents of this supplement.

Additional information about Elliott J. Brink is available on the SEC’s website at www.adviserinfo.sec.gov.

7900 SE 28th Street, Suite 204, Mercer Island, WA 98040, Phone 206.466.6200

Item 2 • Education Background and Business Experience

Elliott J. Brink was born in 1971. Mr. Brink graduated from Seattle Pacific University in 1993, with a degree in business with a finance concentration. Mr. Brink has been a Principal and an investment adviser representative of Paracle Advisors, LLC since February of 2004. He was with Cornerstone Advisors, Inc. from 1995 to 2004.

Mr. Brink became a Certified Financial Planner (CFP®) in September 2003. The CFP® designation identifies individuals who have completed the mandatory examination, education, experience, and ethics requirements mandated by the CFP® Board. Candidates must have at least three years of qualifying work experience that relates to financial planning. Candidates are required to hold a bachelor's degree from an accredited university. CFP® candidates must pass an examination that covers over 100 financial planning topics, which broadly include: general principles of financial planning, insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning. Finally, candidates have ongoing ethics requirements and oversight by the CFP® Board.

Item 3 • Disciplinary Information

None.

Item 4 • Other Business Activities

None

Item 5 • Additional Compensation

None.

Item 6 • Supervision

The Advisor's Chief Compliance Officer, Duane Duim, is primarily responsible for the supervision of all Representatives. All accounts opened through the Advisor are supervised in accordance with the Policies and Procedures established by the Advisor. Clients should contact Mr. Duim at (206) 466-6200 for any questions on the supervision of the Representatives or the Advisor.



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Supplemental Brochure

Joshua E. Harris, CPA

Dated 11/04/2020

This Brochure supplement provides information about Joshua E. Harris that supplements the Paracle Advisors, LLC (“Advisor”) Brochure. You should have received a copy of that Brochure. Please contact Duane Duim, Chief Compliance Officer if you did not receive the Advisor’s Brochure or if you have any questions about the contents of this supplement.

Additional information about Joshua E. Harris is available on the SEC’s website at www.adviserinfo.sec.gov.

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Item 2 • Education Background and Business Experience

Joshua E. Harris was born in 1974. Mr. Harris graduated from University of Washington in 1997, with a degree in business with an accounting concentration. Mr. Harris has been a Principal and an investment adviser representative of Paracle Advisors, LLC since February of 2004. He was with Brighton Jones, LLC from 2001 to 2004.

Mr. Harris has held the designation of Certified Public Accountant (“CPA”) since February 1999. CPAs are licensed and regulated by their state boards of accountancy. While state laws and regulations vary, the education, experience and testing requirements for licensure as a CPA generally include minimum college education (typically 150 credit hours with at least a baccalaureate degree and a concentration in accounting), minimum experience levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA), and successful passage of the Uniform CPA Examination. In order to maintain a CPA license, states generally require the completion of 40 hours of continuing professional education (CPE) each year (or 80 hours over a two year period or 120 hours over a three year period). Additionally, all American Institute of Certified Public Accountants (AICPA) members are required to follow a rigorous Code of Professional Conduct which requires that they act with integrity, objectivity, due care, competence, fully disclose any conflicts of interest (and obtain client consent if a conflict exists), maintain client confidentiality, disclose to the client any commission or referral fees, and serve the public interest when providing financial services. The vast majority of state boards of accountancy have adopted the AICPA’s Code of Professional Conduct within their state accountancy laws or have created their own.

Item 3 • Disciplinary Information

None.

Item 4 • Other Business Activities

None

Item 5 • Additional Compensation

None

Item 6 • Supervision

The Advisor’s Chief Compliance Officer, Duane Duim, is primarily responsible for the supervision of all Representatives. All accounts opened through the Advisor are supervised in accordance with the Policies and Procedures established by the Advisor. Clients should contact Mr. Duim at (206) 466-6200 for any questions on the supervision of the Representatives or the Advisor.



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Supplemental Brochure

Anne Marie Stonich, CPA, CFP®

Dated 11/04/2020

This Brochure supplement provides information about Anne Marie Stonich that supplements the Paracle Advisors, LLC (“Advisor”) Brochure. You should have received a copy of that Brochure. Please contact Duane Duim, Chief Compliance Officer if you did not receive the Advisor’s Brochure or if you have any questions about the contents of this supplement.

Additional information about Anne Marie Stonich is available on the SEC’s website at www.adviserinfo.sec.gov.

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Item 2 • Education Background and Business Experience

Anne Marie Stonich was born in 1975. Ms. Stonich graduated from University of Washington in 1997, with a degree in business with an accounting concentration. Ms. Stonich has been a Principal and an investment adviser representative of Paracle Advisors, LLC since February of 2004. Prior to starting Paracle, Ms. Stonich was with Brighton Jones from 2001 to 2004.

Ms. Stonich became a Certified Financial Planner (CFP®) in March 2004. The CFP® designation identifies individuals who have completed the mandatory examination, education, experience, and ethics requirements mandated by the CFP® Board. Candidates must have at least three years of qualifying work experience that relates to financial planning. Candidates are required to hold a bachelor's degree from an accredited university. CFP® candidates must pass an examination that covers over 100 financial planning topics, which broadly include: general principles of financial planning, insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning. Finally, candidates have ongoing ethics requirements and oversight by the CFP® Board.

Ms. Stonich has held the designation of Certified Public Accountant ("CPA") since June 2000. CPAs are licensed and regulated by their state boards of accountancy. While state laws and regulations vary, the education, experience and testing requirements for licensure as a CPA generally include minimum college education (typically 150 credit hours with at least a baccalaureate degree and a concentration in accounting), minimum experience levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA), and successful passage of the Uniform CPA Examination. In order to maintain a CPA license, states generally require the completion of 40 hours of continuing professional education (CPE) each year (or 80 hours over a two year period or 120 hours over a three year period). Additionally, all American Institute of Certified Public Accountants (AICPA) members are required to follow a rigorous Code of Professional Conduct which requires that they act with integrity, objectivity, due care, competence, fully disclose any conflicts of interest (and obtain client consent if a conflict exists), maintain client confidentiality, disclose to the client any commission or referral fees, and serve the public interest when providing financial services. The vast majority of state boards of accountancy have adopted the AICPA's Code of Professional Conduct within their state accountancy laws or have created their own.

Item 3 • Disciplinary Information

None.

Item 4 • Other Business Activities

None

Item 5 • Additional Compensation

None.

Item 6 • Supervision

The Advisor's Chief Compliance Officer, Duane Duim, is primarily responsible for the supervision of all Representatives. All accounts opened through the Advisor are supervised in accordance with the Policies and Procedures established by the Advisor. Clients should contact Mr. Duim at (206) 466-6200 for any questions on the supervision of the Representatives or the Advisor.



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Supplemental Brochure

Claudina Elizabeth Campbell, CFP®

Dated 11/04/2020

This Brochure supplement provides information about Claudina Elizabeth Campbell that supplements the Paracle Advisors, LLC (“Advisor”) Brochure. You should have received a copy of that Brochure. Please contact Duane Duim, Chief Compliance Officer if you did not receive the Advisor’s Brochure or if you have any questions about the contents of this supplement.

Additional information about Claudina Elizabeth Campbell is available on the SEC’s website at www.adviserinfo.sec.gov.

7900 SE 28th Street, Suite 204, Mercer Island, WA 98040, Phone 206.466.6200

Item 2 • Education Background and Business Experience

Claudina Elizebeth Campbell was born in 1973. Ms. Campbell graduated from Washington State University in 1995, with a degree in business with a finance concentration. Ms. Campbell has been an investment adviser representative of Paracle Advisors, LLC since January of 2009. Ms. Campbell was a financial planner at Brighton Jones, LLC from February of 2000 to January of 2009.

Ms. Campbell became a Certified Financial Planner (CFP®) in July 2008. The CFP® designation identifies individuals who have completed the mandatory examination, education, experience, and ethics requirements mandated by the CFP® Board. Candidates must have at least three years of qualifying work experience that relates to financial planning. Candidates are required to hold a bachelor's degree from an accredited university. CFP® candidates must pass an examination that covers over 100 financial planning topics, which broadly include: general principles of financial planning, insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning. Finally, candidates have ongoing ethics requirements and oversight by the CFP® Board.

Item 3 • Disciplinary Information

None.

Item 4 • Other Business Activities

None

Item 5 • Additional Compensation

None.

Item 6 • Supervision

The Advisor's Chief Compliance Officer, Duane Duim, is primarily responsible for the supervision of all Representatives. All accounts opened through the Advisor are supervised in accordance with the Policies and Procedures established by the Advisor. Clients should contact Mr. Duim at (206) 466-6200 for any questions on the supervision of the Representatives or the Advisor.



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Supplemental Brochure
Duane Michael Duim, CFP®

Dated 11/04/2020

This Brochure supplement provides information about Duane Michael Duim that supplements the Paracle Advisors, LLC (“Advisor”) Brochure. You should have received a copy of that Brochure. Please contact Duane Duim, Chief Compliance Officer if you did not receive the Advisor’s Brochure or if you have any questions about the contents of this supplement.

Additional information about Duane Michael Duim is available on the SEC’s website at www.adviserinfo.sec.gov.

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Item 2 • Education Background and Business Experience

Duane Michael Duim was born in 1973. Mr. Duim graduated from University of Washington in 1998, with a degree in business with a finance concentration. Mr. Duim joined Paracle Advisors, LLC in May of 2011, and in December of 2012 Mr. Duim became a Principal. He became the Chief Compliance Officer in March 2012. Mr. Duim was an investment advisor representative and owner of Blueprint Financial Partners, LLC from February 2010 to May 2011 and a client advisor with Trellis Advisors, LLC from June 2009 to February 2010. Mr. Duim was an investment adviser representative of Laird Norton from August 2000 to May 2009.

Mr. Duim became a Certified Financial Planner (CFP®) in January 2003. The CFP® designation identifies individuals who have completed the mandatory examination, education, experience, and ethics requirements mandated by the CFP® Board. Candidates must have at least three years of qualifying work experience that relates to financial planning. Candidates are required to hold a bachelor's degree from an accredited university. CFP® candidates must pass an examination that covers over 100 financial planning topics, which broadly include: general principles of financial planning, insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning. Finally, candidates have ongoing ethics requirements and oversight by the CFP® Board.

Item 3 • Disciplinary Information

None.

Item 4 • Other Business Activities

None

Item 5 • Additional Compensation

None.

Item 6 • Supervision

The Advisor's Chief Compliance Officer, Duane Duim, is primarily responsible for the supervision of all Representatives. All accounts opened through the Advisor are supervised in accordance with the Policies and Procedures established by the Advisor. Clients should contact Mr. Duim at (206) 466-6200 for any questions on the supervision of the Representatives or the Advisor.



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Supplemental Brochure

Eric Martin Schuehle

Dated 11/04/2020

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Additional information about Eric Martin Schuehle is available on the SEC’s website at www.adviserinfo.sec.gov.

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Item 2 • Education Background and Business Experience

Eric Martin Schuehle was born in 1971. Mr. Schuehle graduated from University of Washington in 1993, with a Bachelor of Arts in Business Administration. Mr. Schuehle has been an investment adviser representative of Paracle Advisors, LLC since June of 2010. From August of 2006 to March of 2009, Mr. Schuehle was a registered trainee at UBS Financial Services Inc. and from April 2006 to August 2006, he was a financial advisor at Morgan Stanley DW Inc. From March 1999 to April 2006, Mr. Schuehle was an investment advisor representative at Quellos Capital Management.

Item 3 • Disciplinary Information

None.

Item 4 • Other Business Activities

None

Item 5 • Additional Compensation

None.

Item 6 • Supervision

The Advisor's Chief Compliance Officer, Duane Duim, is primarily responsible for the supervision of all Representatives. All accounts opened through the Advisor are supervised in accordance with the Policies and Procedures established by the Advisor. Clients should contact Mr. Duim at (206) 466-6200 for any questions on the supervision of the Representatives or the Advisor.



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Supplemental Brochure
Heather Lee Kessler, CFP®

Dated 11/04/2020

This Brochure supplement provides information about Heather Lee Kessler that supplements the Paracle Advisors, LLC (“Advisor”) Brochure. You should have received a copy of that Brochure. Please contact Duane Duim, Chief Compliance Officer if you did not receive the Advisor’s Brochure or if you have any questions about the contents of this supplement.

Additional information about Heather Lee Kessler is available on the SEC’s website at www.adviserinfo.sec.gov.

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Item 2 • Education Background and Business Experience

Heather Lee (Hutson) Kessler was born in 1984. Ms. Kessler graduated from Seattle University in 2006, with a degree in business with a finance concentration. Ms. Kessler has been an investment adviser representative of Paracle Advisors, LLC since November of 2009. Ms. Kessler was a client service manager at Brighton Jones, LLC from June of 2006 to November of 2009.

Ms. Kessler became a Certified Financial Planner (CFP®) in June 2010. The CFP® designation identifies individuals who have completed the mandatory examination, education, experience, and ethics requirements mandated by the CFP® Board. Candidates must have at least three years of qualifying work experience that relates to financial planning. Candidates are required to hold a bachelor's degree from an accredited university. CFP® candidates must pass an examination that covers over 100 financial planning topics, which broadly include: general principles of financial planning, insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning. Finally, candidates have ongoing ethics requirements and oversight by the CFP® Board.

Item 3 • Disciplinary Information

None.

Item 4 • Other Business Activities

None

Item 5 • Additional Compensation

None.

Item 6 • Supervision

The Advisor's Chief Compliance Officer, Duane Duim, is primarily responsible for the supervision of all Representatives. All accounts opened through the Advisor are supervised in accordance with the Policies and Procedures established by the Advisor. Clients should contact Mr. Duim at (206) 466-6200 for any questions on the supervision of the Representatives or the Advisor.



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Supplemental Brochure
Aaren Strand, CFP®

Dated 11/04/2020

This Brochure supplement provides information about Aaren Strand that supplements the Paracle Advisors, LLC (“Advisor”) Brochure. You should have received a copy of that Brochure. Please contact Duane Duim, Chief Compliance Officer if you did not receive the Advisor’s Brochure or if you have any questions about the contents of this supplement.

Additional information about Aaren Strand is available on the SEC’s website at www.adviserinfo.sec.gov.

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Item 2 • Education Background and Business Experience

Aaren Strand was born in 1987. Ms. Strand obtained her B.S. in Financial Planning from Franklin University in 2017. She has worked as an Associate Advisor for Paracle since February 2007 and became an investment adviser representative in November 2014.

Ms. Strand became a Certified Financial Planner (CFP®) in August 2017. The CFP® designation identifies individuals who have completed the mandatory examination, education, experience, and ethics requirements mandated by the CFP® Board. Candidates must have at least three years of qualifying work experience that relates to financial planning. Candidates are required to hold a bachelor's degree from an accredited university. CFP® candidates must pass an examination that covers over 100 financial planning topics, which broadly include: general principles of financial planning, insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning. Finally, candidates have ongoing ethics requirements and oversight by the CFP® Board

Item 3 • Disciplinary Information

None.

Item 4 • Other Business Activities

None

Item 5 • Additional Compensation

None.

Item 6 • Supervision

The Advisor's Chief Compliance Officer, Duane Duim, is primarily responsible for the supervision of all Representatives. All accounts opened through the Advisor are supervised in accordance with the Policies and Procedures established by the Advisor. Clients should contact Mr. Duim at (206) 466-6200 for any questions on the supervision of the Representatives or the Advisor.



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Supplemental Brochure

David Kenneth McIntosh, CFP®

Dated 11/04/2020

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Additional information about David Kenneth McIntosh is available on the SEC’s website at www.adviserinfo.sec.gov.

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Item 2 • Education Background and Business Experience

David K. McIntosh was born in 1989. Mr. McIntosh graduated from the University of Idaho in 2011, with a degree in business with a finance concentration. Mr. McIntosh has been an Associate Advisor and an investment adviser representative of Paracle Advisors, LLC since August of 2015. Prior to joining Paracle, he was an investment adviser representative of Fisher Investments from 2011-2015.

Mr. McIntosh became a Certified Financial Planner (CFP®) in April 2017. The CFP® designation identifies individuals who have completed the mandatory examination, education, experience, and ethics requirements mandated by the CFP® Board. Candidates must have at least three years of qualifying work experience that relates to financial planning. Candidates are required to hold a bachelor's degree from an accredited university. CFP® candidates must pass an examination that covers over 100 financial planning topics, which broadly include: general principles of financial planning, insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning. Finally, candidates have ongoing ethics requirements and oversight by the CFP® Board.

Item 3 • Disciplinary Information

None.

Item 4 • Other Business Activities

None

Item 5 • Additional Compensation

None.

Item 6 • Supervision

The Advisor's Chief Compliance Officer, Duane Duim, is primarily responsible for the supervision of all Representatives. All accounts opened through the Advisor are supervised in accordance with the Policies and Procedures established by the Advisor. Clients should contact Mr. Duim at (206) 466-6200 for any questions on the supervision of the Representatives or the Advisor.



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Supplemental Brochure

Kyle Berkley Larson, CFP®

Dated 11/04/2020

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Additional information about Kyle Berkley Larson is available on the SEC’s website at www.adviserinfo.sec.gov.

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Item 2 • Education Background and Business Experience

Kyle Berkley Larson was born in 1986. Mr. Larson graduated from Washington State University in 2009, with a bachelor's in business administration with a concentration in Finance. Mr. Larson worked as an Analyst and Portfolio Manager with Pacific Portfolio Consulting from May 2009 until April 2014. Mr. Larson has been an investment advisor representative of Paracle since April 2014.

Mr. Larson became a Certified Financial Planner (CFP®) in May 2015. The CFP® designation identifies individuals who have completed the mandatory examination, education, experience, and ethics requirements mandated by the CFP® Board. Candidates must have at least three years of qualifying work experience that relates to financial planning. Candidates are required to hold a bachelor's degree from an accredited university. CFP® candidates must pass an examination that covers over 100 financial planning topics, which broadly include: general principles of financial planning, insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning. Finally, candidates have ongoing ethics requirements and oversight by the CFP® Board.

Item 3 • Disciplinary Information

None.

Item 4 • Other Business Activities

None

Item 5 • Additional Compensation

None.

Item 6 • Supervision

The Advisor's Chief Compliance Officer, Duane Duim, is primarily responsible for the supervision of all Representatives. All accounts opened through the Advisor are supervised in accordance with the Policies and Procedures established by the Advisor. Clients should contact Mr. Duim at (206) 466-6200 for any questions on the supervision of the Representatives or the Advisor.



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Supplemental Brochure

David Bigelow, CFP®

Dated 11/04/2020

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Additional information about David Bigelow is available on the SEC’s website at www.adviserinfo.sec.gov.

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Item 2 • Education Background and Business Experience

David Bigelow, born 1991, obtained his bachelor's degree in Accounting from Gonzaga University in 2014. He obtained his Master's in Business Administration in 2015. In 2015 he worked several months for Moss Adams as an Audit Associate. From 2015 to 2017 he was a Real Estate Representative at Mod Pizza. He joined Paracle Advisors in 2018 as an Associate Advisor and earned his Certificate of Financial Planning from NC State University in 2018.

Mr. Bigelow became a Certified Financial Planner (CFP®) in December 2019. The CFP® designation identifies individuals who have completed the mandatory examination, education, experience, and ethics requirements mandated by the CFP® Board. Candidates must have at least three years of qualifying work experience that relates to financial planning. Candidates are required to hold a bachelor's degree from an accredited university. CFP® candidates must pass an examination that covers over 100 financial planning topics, which broadly include: general principles of financial planning, insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning. Finally, candidates have ongoing ethics requirements and oversight by the CFP® Board.

Item 3 • Disciplinary Information

None.

Item 4 • Other Business Activities

None

Item 5 • Additional Compensation

None.

Item 6 • Supervision

The Advisor's Chief Compliance Officer, Duane Duim, is primarily responsible for the supervision of all Representatives. All accounts opened through the Advisor are supervised in accordance with the Policies and Procedures established by the Advisor. Clients should contact Mr. Duim at (206) 466-6200 for any questions on the supervision of the Representatives or the Advisor.



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Supplemental Brochure

Leslie Brooks Rosenberg, CFP®

Dated 11/04/2020

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Additional information about Leslie Brooks Rosenberg is available on the SEC’s website at www.adviserinfo.sec.gov.

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Item 2 • Education Background and Business Experience

Leslie Brooks Rosenberg was born in 1986. Ms. Rosenberg graduated from Bryn Mawr College in 2008 with a Bachelor of Arts in Economics. From 2008 through 2011 she was an analyst with J.P. Morgan's Private Bank. From 2011 through 2012 she worked as a Research Analyst in Princeton University's Office of Development. In 2012, she also worked as a Portfolio Specialist at BlackRock, before returning to J.P. Morgan's Private Bank as an Associate from 2012 through 2015. Ms. Rosenberg joined Paracle as an Associate Advisor in January 2016.

Ms. Rosenberg became a Certified Financial Planner (CFP®) in November 2017. The CFP® designation identifies individuals who have completed the mandatory examination, education, experience, and ethics requirements mandated by the CFP® Board. Candidates must have at least three years of qualifying work experience that relates to financial planning. Candidates are required to hold a bachelor's degree from an accredited university. CFP® candidates must pass an examination that covers over 100 financial planning topics, which broadly include: general principles of financial planning, insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning. Finally, candidates have ongoing ethics requirements and oversight by the CFP® Board.

Item 3 • Disciplinary Information

None.

Item 4 • Other Business Activities

None

Item 5 • Additional Compensation

None.

Item 6 • Supervision

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Supplemental Brochure

Katie Mietus

Dated 11/04/2020

This Brochure supplement provides information about Katie Mietus that supplements the Paracle Advisors, LLC (“Advisor”) Brochure. You should have received a copy of that Brochure. Please contact Duane Duim, Chief Compliance Officer if you did not receive the Advisor’s Brochure or if you have any questions about the contents of this supplement.

Additional information about Katie Mietus is available on the SEC’s website at www.adviserinfo.sec.gov.

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Item 2 • Education Background and Business Experience

Katherine (“Katie”) Marie Mietus was born in 1996. Ms. Mietus graduated from the State University of New York at Oswego in December 2017 with a bachelor’s degree in Business Administration and a minor in Economics. She has worked in the financial services industry since January 2018 when she joined Ogorek Wealth Management, LLC as a Financial Advisor Associate. She joined Paracle Advisors, LLC in February 2019 as an Associate Advisor.

Item 3 • Disciplinary Information

None.

Item 4 • Other Business Activities

None

Item 5 • Additional Compensation

None.

Item 6 • Supervision

The Advisor’s Chief Compliance Officer, Duane Duim, is primarily responsible for the supervision of all Representatives. All accounts opened through the Advisor are supervised in accordance with the Policies and Procedures established by the Advisor. Clients should contact Mr. Duim at (206) 466-6200 for any questions on the supervision of the Representatives or the Advisor