



Part 2A of Form ADV: Firm Brochure

1. Cover Page

1. A.

Pavlov Analytics, LLC (DBA Pavlov Financial Planning)

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Contact Person: Hui-chin Chen, CFP® - Owner and Financial Planner

Date of Brochure: February 1, 2018

1. B.

This brochure provides information about the qualifications and business practices of Pavlov Analytics, LLC (DBA Pavlov Financial Planning; abbreviated "PFP" later in this document). If you have any questions about the contents of this brochure, please contact us at 703.531.8758 and/or huichin@pavlovfp.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.

Additional information about Pavlov Analytics, LLC (DBA Pavlov Financial Planning) is available on the SEC's website at <http://www.adviserinfo.sec.gov>



2. Material Changes

Since last filing dated April 24, 2017, Pavlov Analytics, LLC (DBA Pavlov Financial Planning) has undergone major management changes and substantially modified its service offerings. In some occasions, PFP updated the document for ease of reading without changing the underlying language or intention. Please read the document in its entirety, especially Section 4 and 5, for latest information.



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4. Advisory Business

4.A. Pavlov Analytics, LLC (DBA Pavlov Financial Planning) is a financial planning firm that conducts continuous and comprehensive financial planning to help clients live the life they envision.

Pavlov Analytics, LLC obtained its initial registration with the Commonwealth of Virginia on August 11th, 2010 and with the District of Columbia on August 28th, 2017.

On January 1st, 2018, Hui-chin Chen, CFP®, a member previously with 30% stake, obtained full ownership of Pavlov Analytics, LLC from the founder, Marcio Silveira. Beginning February 1st, 2018, Marcio Silveira is no longer a registered representative of Pavlov Analytics, LLC.

4.B. PFP provides financial planning and consultation services. The services include, but are not limited to:

- 1) Reviewing and planning for retirement, tax, education, major purchases, debt management, life and disability insurance needs, long-term care needs, and estate issues.
- 2) Monitoring budget, investment performance, and the progress of action step implementation
- 3) Reviewing employer provided benefits / planning benefits for self-employed
- 4) Analyzing financial impact of potential life changes or options to help Client make decisions
- 5) Answering or referring to experts Client's personal finance related questions

These services take into account PFP's opinion on the future performance of capital markets. PFP does not sell any financial products and does not have assets under management.

In addition to financial planning services, Hui-chin Chen, CFP® provides information and educational content on personal finance related topics, including investing, free of cost or any fee to readers through the following website:

<https://moneymattersforglobetrotters.com>

4.C. PFP takes into account each client's needs and give customized advice. Clients may impose restrictions on investing in certain securities or types of securities. PFP makes the best effort to incorporate these preferences in our recommendation.

4.D. The firm does not participate in wrap-fee programs.



4.E. The firm does not continuously manage client assets.

5. Fees and Compensation

PFP offers services in three ways. Below is a brief summary of the key differences among them. For detail fee structure and billing methods, please refer to the individual section below the table.

Pavlov Planning Partnership Program (The GPS)	One-Time Planning Engagement (The Map)	Hourly Consultation (The Occasional Guide)
Comprehensive Planning	Comprehensive Planning	Limited to concerns
Evolving	Static	Static
Continuous support, monitoring, and planning updates	No support beyond completion of the plan	No support outside meeting time
\$249 / month	\$3,000 / engagement	\$275 / hour
Minimum 12 months commitment	No commitment	No commitment

PAVLOV PLANNING PARTNERSHIP PROGRAM (The GPS)

5.A.

Pavlov Planning Partnership Program is PFP's flagship offering since 2013. Under this program, Clients receive continuous financial guidance, monitoring, and planning updates. PFP works like a GPS to help clients define, plan and arrive at their lives' destinations.

(To learn more about the full program experience, please refer to the "What to Expect" document available upon request.)

This program is particularly suited for clients who desire ongoing relationship and accountability in a partner to manage their finances together.



PFP charges **\$249 per month** for the **annual membership**. There is no upfront fee; nor is there income or asset restrictions to join the program. However, PFP will only admit clients into the program if they expect to be able to commit to the program for **at least 12 months**.

PFP reserves the right to adjust the fee at our discretion. PFP reviews membership fee annually and may adjust fees after the initial 12 months. Clients will receive verbal and e-mail notification prior to fee changes and will be able to exit the program without penalty if they do not agree with the adjustment. The client's established agreement will continue to be in force after fee adjustment.

The fee is not negotiable.

5.B.

PFP invites clients to authorize monthly recurring billing when they sign the financial planning agreement. The first payment is due one month after the execution of the agreement.

The execution of the financial planning agreement marks the client's decision to receive and pay for the continuous service. The first monthly payment covers all services provided to the client from the date that the client signed the agreement to the date that PFP charges first payment.

Clients may terminate their contracts without penalty within five business days of signing the financial planning agreement or any time afterwards without incurring penalty. PFP reserves the right to reject clients' application into the program if they are not willing to participate in the program for at least 12 months.

PFP charges membership fees every month in arrears, so refund is not necessary.

ONE-TIME PLANNING ENGAGEMENT (The Map)

5.A.

One-time planning engagement provides comprehensive financial planning based on data at one point of time. Clients will receive a static financial plan, including action steps, projection results, and accompanying assumptions.

Within three months after receiving the plan, clients may schedule a free 30-minute check-in call to resolve any additional questions. PFP does not offer additional support after the final presentation meeting outside of the 30-minute check-in call.



PPF gives clients a financial road map. Clients will find their way forward.

This service is suited for clients who desire a comprehensive view of their finances and goals at one point of time, but do not want long-term relationship or accountability from a partner.

The one-time planning engagement costs **\$3,000 per engagement**. The client's established agreement concludes after the check-in call. Any future engagement requires a new agreement.

The fee is not negotiable.

5.B.

PPF invites clients to authorize a payment plan of \$1,000 per month for three months when they sign the financial planning agreement. The first payment is due one month after the execution of the agreement. The subsequent two payments are due on the same day of the following two months, respectively.

Below is PFP's best estimate of the timeline of the planning process if clients provide information and schedule meetings in a timely manner.

Timeline	Clients	PPF	Payment
Month 1	Provide data. Attend data gathering meeting.	Review data Conduct data gathering meeting before end of first month.	\$1,000 at end of Month 1
Month 2	Attend final presentation meeting and provide feedback.	Create draft plan. Conduct final presentation meeting and obtain feedback.	\$1,000 at end of Month 2
Month 3	Confirm receipt of the plan Implement plan.	Complete and send final plan. Close out client account.	\$1,000 at end of Month 3
Month 4-6	Schedule free 30-minute check-in call if needed.	Attend check-in call.	None

Clients may terminate their agreements without penalty within five business days of signing the financial planning agreement without incurring penalty.

If clients wish to terminate their agreements after the first five business days of signing, PFP will process refund according to the following schedule:



After	Before	Refund
Client signs the agreement	Data gathering meeting	Cancel scheduled payments and full refund.
Data gathering meeting	PFP begins drafting plan	Full refund minus \$500 fee for service performed. Cancel remaining payments.
PFP begins drafting plan	PFP delivers draft plan outline in presentation meeting	No refund of first payment. Cancel remaining two payments.
PFP delivers draft plan in presentation meeting	PFP completes and client receives final plan	No refund of first two payments. Cancel last scheduled payment.
Client receives final plan		Scheduled payment not cancellable. No refund of payments.

HOURLY CONSULTATION (The Occasional Guide)

5.A.

Hourly consultation allows clients to discuss their most pressing financial concerns and current financial status. Client receives advice based on the information provide within the meeting. After the meeting, clients may opt to receive an e-mail summarizing high-level action steps discussed during the meeting. PFP does not give any advice outside the meeting or the summary e-mail.

This service is suited for clients who want a quick financial checkup without detail analysis, or just to get some answers to their questions.

PFP provides consultation at \$275 per hour. PFP requires a minimum of one hour of engagement. Beyond the first hour, PFP will bill client at half hour increments.

The fee is not negotiable. However, discount may be given if a client exhibits financial hardship.

5.B.

In order to secure an appointment, clients will sign the financial consultation agreement and authorize a one-time billing of one-hour consultation that goes into effect on the day after the requested appointment date.



Clients may be invoiced for time beyond the first hour meeting if the initial meeting lasts beyond one hour.

Clients may terminate contracts without penalty within five business days of signing the consultation agreement or any time afterwards without incurring penalty.

PFP charges consultation fee after providing the service; therefore no refund is necessary.

The following items under Section 5 apply to all three services.

5.C.

Clients may pay fees related to the implementation of the plan directly to third parties, such as brokerage firms, mutual fund companies, tax accountants, insurance agents, and estate attorneys. PFP does not receive any compensation from these parties and does not bill or collect fees on their behalf.

5.D.

Clients do not pay any fee in advance.

5.E.

PFP, and any individual connected to PFP, does not receive any compensation related to the sale of securities or other investment products.

Clients may choose to implement PFP's advice with any third party provider.

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

PFP does not charge performance-based fees.

7. Types of Clients

PFP may provide advice to the following types of investment advisory clients:

A. Individuals

B. Trusts and Estates

Since PFP does not engage in on-going Asset Management there are no requirements for opening or maintaining an account.

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



8.A. PFP uses methods of analysis that are consistent with the project and the client.

Typically the methods used are as follows:

Asset Class Allocation / Broad Diversification / Passive Approach / Low Cost Mutual and Exchanged Traded Funds

Hui-chin Chen, CFP®, owner of Pavlov Analytics, LLC (DBA Pavlov Financial Planning) believes that capital markets are mostly efficient and that low cost indexed investment products are generally the best alternative. In some cases, however, investments in individual securities may be appropriate. The academic literature in Finance suggests that broadly diversified and low cost investments are a sensible choice for most individual investors.

It is important to clarify that the investments in individual securities and investment funds involve the risk of loss. Sometimes the loss may be substantial. Although the methods of analysis used seek to manage this risk, it is never eliminated.

8.B. The methods of analysis used to recommend investments to individual investors are exposed to broad market risk. Interest rates, exchange rates and stock market prices fluctuate over time and may expose investors to losses. In periods of severe market instability the loss may be very pronounced.

Investments in specific company securities may result in a permanent loss of the whole amount invested. In some extreme circumstances investors may be legally responsible to pay for losses that go beyond the amount they invested. Generally, PFP does not recommend the investment in individual securities, but some specific client circumstances may justify such investments, especially if the sale of individual securities creates negative tax consequences.

8.C. Different types of securities with different degrees of risks are recommended. No particular type of security is preferred. The recommended securities are chosen according to their fit to the client's plan. Pavlov Analytics, LLC (DBA Pavlov Financial Planning) evaluates the risks in a portfolio context.

9. Disciplinary Information

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of the business of Pavlov Analytics, LLC (DBA Pavlov Financial Planning) or the integrity of its management.



Specifically, there is not and there was not any criminal or civil action in a domestic, foreign or military court of competent jurisdiction in which PFP or its management is or was involved. Also, there is not and there was not any administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which Pavlov Analytics or its management is or was involved.

10. Other Financial Industry Activities and Affiliations

10.A. Pavlov Analytics, LLC or its management persons are not registered nor plan to register as a broker-dealer or as a registered representative of a broker-dealer.

10.B. Pavlov Analytics, LLC or its management persons are not registered nor plan to register as a futures commission merchant, commodity pool operator, commodity trading advisor, or an associated person of the foregoing entities.

10.C. Pavlov Analytics, LLC as a firm and both of its members do not have any involvement with other entities in the investment industry. The firm is completely independent.

Specifically, no related person is involved with the following activities:

1. Broker-dealer, municipal securities dealer, or government securities dealer or broker
2. Investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund," and offshore fund)
3. Futures commission merchant, commodity pool operator, or commodity trading advisor
4. Banking or thrift institution
5. Accountant or accounting firm
6. Lawyer or law firm
7. Insurance company or agency
8. Pension consultant
9. Real estate broker or dealer
10. Sponsor or syndicator of limited partnerships

10. D. Pavlov Analytics, LLC does not receive any direct or indirect compensation from other advisors for recommending them to its clients. Pavlov Analytics, LLC or its management does not engage in any business activities with other advisors that may create a material conflict of interest.



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

11. A. Pavlov Analytics, LLC (DBA Pavlov Financial Planning) adopts the CFA Institute Code of Ethics and Standards of Professional Conduct.

A copy of the CFA Institute Code of Ethics and Standards of Professional Conduct will be provided free of charge to any client or prospective client of Pavlov Analytics, LLC (DBA Pavlov Financial Planning) upon request. It can also be downloaded by anyone at: <http://www.cfainstitute.org/ethics/codes/ethics/Pages/index.aspx>

11.B. Pavlov Analytics, LLC (DBA Pavlov Financial Planning) or its management does not buy or sell for client accounts, securities in which the firm or a related person has a material financial interest.

11.C. Pavlov Analytics, LLC (DBA Pavlov Financial Planning) or its management sometimes invest in the same securities it recommends to clients. The said securities only include passively managed index mutual fund or passively managed index Exchange Traded Funds. Pavlov Analytics, LLC (DBA Pavlov Financial Planning) or its management may engage in trades of such securities at the same time coincidentally as the clients due to regular balancing events. Pavlov Analytics, LLC (DBA Pavlov Financial Planning) or its management will disclose their holding in such securities orally if such securities are recommended to clients.

11.D. Pavlov Analytics, LLC (DBA Pavlov Financial Planning) or its management does not engage in any form of short term trading activity. Pavlov Analytics or its management does not recommend securities to clients at or about the same time it buys or sells the same securities for its own account.

12. Brokerage Practices

12.A. Pavlov Analytics, LLC (DBA Pavlov Financial Planning) does not select or recommend broker dealers for client transactions.

12.B. Pavlov Analytics, LLC (DBA Pavlov Financial Planning) does not manage client accounts. PFP has no policy for executing transactions for such accounts. Therefore, there is no policy of aggregation of purchase or sale of securities for various client accounts.

13. Review of Accounts



13.A. Pavlov Analytics, LLC (DBA Pavlov Financial Planning) does not provide continuously supervisory services on client accounts. The firm provides financial planning and consultation services and support clients' continuous implementation of the plan. The firm highly recommends that clients review and update their goals and strategies every six months or if a material event takes place that affects the clients' financial condition.

The reviewer is Hui-chin Chen, CFP®, owner of Pavlov Analytics, LLC (DBA Pavlov Financial Planning). Hui-chin Chen, CFP® reviews all client plans.

13. B. Pavlov Analytics, LLC (DBA Pavlov Financial Planning) reviews plans and strategies every six months. PFP also recommends clients to update their plans and strategies beyond normal schedule if a material life event takes place, such as marriage, divorce, sale of a business, receiving inheritance, etc.

13.C. Since Pavlov Analytics, LLC (DBA Pavlov Financial Planning) does not continuously manage client accounts; it does not send regular reports to clients regarding their accounts.

14. Client Referrals and Other Compensation

14.A. Pavlov Analytics, LLC (DBA Pavlov Financial Planning) or its management does not receive any economic benefit from parties who are not clients. Specifically, no third party compensates the firm or its management for client referrals.

14.B. Pavlov Analytics, LLC (DBA Pavlov Financial Planning) or its management does not compensate directly or indirectly any third party for client referrals.

15. Custody

Pavlov Analytics, LLC (DBA Pavlov Financial Planning) does not have any custody of clients' funds or securities.

16. Investment Discretion

Pavlov Analytics, LLC (DBA Pavlov Financial Planning) does not have discretionary authority to manage securities accounts on behalf of clients.

17. Voting Client Securities

Pavlov Analytics, LLC (DBA Pavlov Financial Planning) does not have or accepts authority to vote client securities.



18. Financial Information

18.A. Pavlov Analytics, LLC (DBA Pavlov Financial Planning) does not require its investment advice clients to make any prepayment of fees.

18.B. Pavlov Analytics, LLC (DBA Pavlov Financial Planning) does not have discretionary authority or custody of client funds or securities.

18.C. Pavlov Analytics, LLC (DBA Pavlov Financial Planning) or its management has never been the subject of a bankruptcy petition.

19. Requirements for State-Registered Advisers

19.A. Investment decision maker at Pavlov Analytics, LLC (DBA Pavlov Financial Planning) is Hui-chin Chen, CFP®, - Title: Owner and Financial Planner.

Information regarding the formal education and business background for Hui-chin Chen, CFP®, is provided in the Brochure Supplements.

19.B. As a financial planning firm, part of the financial plans include elements other than investments, like insurance and debt management. Pavlov Analytics, LLC (DBA Pavlov Financial Planning) or its management does not sell Insurance or debt products. PFP only sells consultation services. PFP spends estimated 20% of the total service time on providing these consultative services.

19.C. Pavlov Analytics, LLC (DBA Pavlov Financial Planning) or its management is not compensated with performance-based fees.

19.D. Pavlov Analytics, LLC (DBA Pavlov Financial Planning) or its management has never been involved or found liable in any arbitration claim. Also, Pavlov Analytics, LLC (DBA Pavlov Financial Planning) or its management has never been involved or found liable in any proceeding involving any civil, self-regulatory organization, or administrative proceeding.

19.E. Pavlov Analytics, LLC (DBA Pavlov Financial Planning) or its management does not have any relationship or arrangement with any issuer of securities that is not listed in Item 10.C. above.

(End of ADV Part 2A)



Part 2B of Form ADV: Brochure Supplement

1.A.

Investment Adviser Representative Name: Hui-chin Chen, CFP®

Firm Name: Pavlov Analytics, LLC (DBA Pavlov Financial Planning)

Primary Business Address: 1100 North Glebe Road, Suite 1010 - Arlington, VA 22201

Phone: 703.531.8758 / 703.224.8187

Email: huichin@pavlovfp.com

Website: www.pavlovfp.com

Date of Brochure Supplement: - February 1st, 2018

1.B.

This brochure supplement provides information about Hui-chin Chen, CFP® that supplements the firm's brochure. You should have received a copy of that brochure. Please contact Hui-chin Chen at huichin@pavlovfp.com if you did not receive Pavlov Analytics, LLC (DBA Pavlov Financial Planning)'s brochure or if you have any questions about the contents of this supplement.

Additional information about Hui-chin Chen, CFP® is available on the SEC's website at www.adviserinfo.sec.gov



2. Educational Background and Business Experience

Hui-chin Chen

Year of birth: 1982

Education

Bachelor of Business Administration

National Taiwan University

Master of Science in Public Policy and Management

Heinz College – Carnegie Mellon University

CFP® Certificant

CFP® CERTIFICATION EXPLANATION STATEMENT

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 71,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and



- Ethics – Agree to be bound by CFP Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

Experience

Company: Pavlov Analytics, LLC (DBA Pavlov Financial Planning)

Title: Financial Planner

Start Date: Jan 2014

Company: Saturn Portfolio Management, LTD

Title: Administrative Support

Start Date: Feb 2014

End Date: Jul 2015

Company: Pavlov Analytics, LLC (DBA Pavlov Financial Planning)

Title: Research and Financial Planning Analyst

Start Date: Apr 2013

End Date: Dec 2013

Company: San Yes Automotive Technology, Ltd

Title: Sales

Start Date: Feb 2011

End Date: Jun 2011

Company: Institute of Financial Management and Research

Title: Research Associate



Start Date: Aug 2009

End Date: Sep 2010

Company: Freddie Mac

Title: Senior Risk Analyst

Start Date: Apr 2008

End Date: Jul 2009

Company: Freddie Mac

Title: Economic Analyst

Start Date: Jul 2006

End Date: Mar 2008

3. Disciplinary Information

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation involving Hui-chin Chen, CFP®.

Specifically, there is not and there was not any criminal or civil action in a domestic, foreign or military court of competent jurisdiction in which Hui-chin Chen, CFP® was involved. Also, there is not and there was not any administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which Hui-chin Chen, CFP® was involved.

4. Other Business Activities

4.A. Hui-chin Chen, CFP® does not have a registration or an application pending to register with any other investment-related business.

4.B. Hui-chin Chen, CFP® is not engaged in any other non-investment related business or occupation.

5. Additional Compensation

Only clients compensate Pavlov Analytics, LLC (DBA Pavlov Financial Planning) and Hui-chin Chen, CFP®. No third party provides an economic benefit to Hui-chin Chen, CFP® for providing referrals or selling any product.

6. Supervision

Hui-chin Chen, CFP® performs all supervisory responsibilities on herself.

7. Requirements for State-Registered Advisers



7. A. Hui-chin Chen, CFP® has never been involved or found liable in any arbitration claim. Also, Hui-chin Chen, CFP® has never been involved or found liable in any proceeding involving any civil, self-regulatory organization, or administrative proceeding.

7. B. Hui-chin Chen, CFP® has never been the subject of a bankruptcy petition.

(End of ADV Part 2B)