

BULL OAK CAPITAL, LLC

Firm Brochure - Form ADV Part 2A



BULL OAK
— CAPITAL —

This brochure provides information about the qualifications and business practices of Bull Oak Capital, LLC. If you have any questions about the contents of this brochure, please contact us at (619) 618-2423 or by email at: info@bulloakcapital.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 Bull Oak Capital, LLC is also available on the SEC's website at www.adviserinfo.sec.gov. Bull Oak Capital LLC's CRD number is: 170325.

4747 Executive Drive, Suite 1010
San Diego, CA 92121
(858) 999-3550
www.bulloakcapital.com
info@bulloakcapital.com

Registration does not imply a certain level of skill or training.
Version Date: 4/25/2019

ITEM 2 - MATERIAL CHANGES

The purpose of this page is to inform you of any material changes since the last annual update to this brochure. If you are receiving this brochure for the first time, this section may not be relevant to you. Bull Oak Capital reviews and updates our brochure at least annually to make sure that it remains current. We have made the following material changes since the last update to this brochure, dated 1/8/2019:

- Our business address and telephone numbers have been updated.

Pursuant to SEC Rules, Bull Oak Capital will ensure that clients receive a summary of any materials changes to this Brochure within 120 days of the close of Bull Oak Capital's fiscal year. Additionally, as the firm experiences material changes in the future, we will send you a summary of our "Material Changes" under separate cover. For more information about the firm, please visit www.bulloakcapital.com or call (858) 999-3550.

ITEM 3 - TABLE OF CONTENTS

Item 1: Cover Page	
Item 2: Material Changes.....	1
Item 3: Table of Contents.....	2
Item 4: Advisory Business.....	4
A. Description of the Advisory Firm.....	4
B. Types of Advisory Services.....	4
C. Client Tailored Services and Client Imposed Restrictions.....	5
D. Wrap Fee Programs.....	6
E. Assets Under Management.....	6
Item 5: Fees and Compensation.....	6
A. Fee Schedule.....	6
B. Payment of Fees.....	8
C. Client Responsibility For Third Party Fees.....	8
D. Prepayment of Fees.....	8
E. Outside Compensation For the Sale of Securities to Clients.....	8
Item 6: Performance-Based Fees and Side-By-Side Management.....	9
Item 7: Types of Clients.....	9
Item 8: Methods of Analysis, Investment Strategies, and Risk of Investment Loss.....	9
A. Methods of Analysis and Investment Strategies.....	9
B. Material Risks involved.....	10
C. Risks of Specific Securities Utilized.....	10
Item 9: Disciplinary Information.....	11
A. Criminal or Civil Actions.....	11
B. Administrative Proceedings.....	12
C. Self-regulatory Organization (SRO) Proceedings.....	12
Item 10: Other Financial Industry Activities and Affiliations.....	12
A. Registration as a Broker/Dealer or Broker/Dealer Representative.....	12
B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor.....	12
C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests.....	12
D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections.....	12
Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.....	12
A. Code of Ethics.....	12
B. Recommendations Involving Material Financial Interests.....	13
C. Investing Personal Money in the Same Securities as Clients.....	13
D. Trading Securities At/Around the Same Time as Clients' Securities.....	13

Item 12: Brokerage Practices.....	13
A. Factors Used to Select Custodians and/or Broker/Dealers.....	13
1. Research and Other Soft-Dollar Benefits.....	14
2. Brokerage for Client Referrals.....	14
3. Clients Directing Which Broker/Dealer/Custodian to Use.....	14
B. Aggregating (Block) Trading for Multiple Client Accounts.....	14
Item 13: Reviews of Accounts.....	14
A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews.....	14
B. Factors That Will Trigger a Non-Periodic Review of Client Accounts.....	14
C. Content and Frequency of Regular Reports Provided to Clients.....	14
Item 14: Client Referrals and Other Compensation.....	15
A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)	15
B. Compensation to Non – Advisory Personnel for Client Referrals.....	15
Item 15: Custody.....	15
Item 16: Investment Discretion.....	15
Item 17: Voting Client Securities (Proxy Voting)	16
Item 18: Financial Information.....	16
A. Balance Sheet.....	16
B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients.....	16
C. Bankruptcy Petitions in Previous Ten Years.....	16
Item 19: Requirements For State Registered Advisers.....	16
A. Principal Executive Officers and Management Persons; Their Formal Education and Business Background.....	16
B. Other Businesses in Which This Advisory Firm or its Personnel are Engaged and Time Spent on Those (If Any)	16
C. How Performance-based Fees are Calculated and Degree of Risk to Clients.....	16
D. Material Disciplinary Disclosures for Management Persons of this Firm.....	17
E. Material Relationships That Management Persons Have With Issuers of Securities (If Any)	17

ITEM 4 - ADVISORY BUSINESS

Business Description

Bull Oak Capital is a San Diego, California based registered investment adviser. As a registered investment adviser, we are held to the highest standard of client care – a fiduciary standard. As a fiduciary, we always put our client’s interests first and must fully disclose any potential conflict of interest. We do not directly hold customer funds or securities and all transactions are sent to our qualified custodian which executes, compares, allocates, clears and settles them. Our custodian also maintains our clients’ accounts and may grant clients access to them. We provide investment advisory and financial planning services to individuals and high-net-worth individuals.

A. Description of the Advisory Firm

Bull Oak Capital LLC (hereinafter “Bull Oak”) is a Limited Liability Company organized in the State of California.

The firm was formed in January 2014 and the principal owner is Ryan Anthony Hughes.

B. Types of Advisory Services

Bull Oak Capital offers personalized investment advisory services to individuals, pension and profit-sharing plans, trusts, estates, charitable organizations, corporations, and other business entities. Advisory services including financial planning, consulting, selection of sub advisers, and portfolio management services, may be offered to clients on an all-inclusive or individual basis, as part of an annual retainer program. The process typically begins with an initial consultation during which the various services provided by Bull Oak Capital are explained. If it is the desire of the client to use the firm’s services, Bull Oak Capital and the client will determine the scope of the services to be provided.

Financial Planning and Consulting Services

Financial planning services will typically involve providing a variety of services, principally advisory in nature, to clients regarding the management of their financial resources based upon an analysis of their individual needs. Bull Oak will first conduct a complimentary initial consultation. After the initial consultation, if the client decides to engage Bull Oak for financial planning services, pertinent information about the client’s financial circumstances and objectives is collected and such information will be reviewed and analyzed. A written financial plan – designed to achieve the clients’ stated financial goals and objectives – will be produced and presented to the client. The primary objective of this process is to allow Bull Oak to assist the client in developing a strategy for the successful management of income, assets, and liabilities in meeting the client’s financial goals and objectives.

Clients should be aware that different financial planning software uses different financial planning methodologies and the financial plan will describe the specific methodologies used for the particular plan and should be carefully considered in evaluating the results presented to the client. The analysis contained in the financial plan is currently conducted using RightCapital financial planning software. The estimated returns generated by the software utilize RightCapital proprietary formulas and are based on economic assumptions and forecasts developed by an unaffiliated third party TWAMS

Financial Planning, LLC, and approved by Bull Oak. In addition, clients' financial plans may include a Monte Carlo simulation. Monte Carlo simulations are used to show how variances in rates of return each year can affect results. Results using Monte Carlo simulations indicate the likelihood that an event may occur as well as the likelihood that it may not occur. Bull Oak may change the software, third-party provider or the methodologies it uses when creating your financial plan. Your financial plan will provide details on the software and methodologies used.

Portfolio Management Services

Bull Oak offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. Bull Oak creates an Investment Policy Statement for each client, which outlines the client's current situation (income, tax levels, and risk tolerance levels). Portfolio management services include, but are not limited to, the following:

- Investment strategy
- Asset allocation
- Risk tolerance
- Personal investment policy
- Asset selection
- Regular portfolio monitoring

Bull Oak evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. Bull Oak will request discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

Bull Oak seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and without consideration of Bull Oak's economic, investment or other financial interests. To meet its fiduciary obligations, Bull Oak attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and accordingly, Bull Oak's policy is to seek fair and equitable allocation of investment opportunities/transactions among its clients to avoid favoring one client over another over time. It is Bull Oak's policy to allocate investment opportunities and transactions it identifies as being appropriate and prudent among its clients on a fair and equitable basis over time.

Services Limited to Specific Types of Investments

Bull Oak generally limits its investment advice to ETFs. However, it may also include equities, mutual funds, fixed income securities and treasury inflation protected/inflation linked bonds. Bull Oak may use other securities as well to help diversify a portfolio when applicable.

C. Client Tailored Services and Client Imposed Restrictions

Bull Oak offers the same suite of services to all of its clients. However, specific client investment strategies 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). Clients may not impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs.

D. Wrap Fee Programs

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and other administrative fees. Bull Oak does not participate in any wrap fee programs.

E. Assets Under Management

As of December 31, 2018, Bull Oak managed \$44,246,821 in total assets, all of which was on a discretionary basis.

ITEM 5 - FEES AND COMPENSATION

As described in greater detail below, Bull Oak charges different types of fees, including fees based on a percentage of assets under management and fixed fees. The specific fees charged by Bull Oak will be set forth in the applicable client agreement. Fees are negotiable at the sole discretion of Bull Oak. Although Bull Oak believes its advisory fees are competitive, clients should be aware that lower fees for comparable services may be available from other sources.

A. Fee Schedule

Financial Planning and Consulting Fees

Clients who engage Bull Oak for Portfolio Management Services may receive the firm's Financial Planning and Consulting Services on a complimentary basis. Fees for Financial Planning and Consulting Services provided on a stand-alone basis are agreed to in writing before the firm renders its services.

Bull Oak typically charges a fixed fee for its Financial Planning and Consulting Services. Generally, depending upon the scope and complexity of the services provided, fixed fees typically range from \$3,500 to \$4,500. Customized proposals are available upon request. This rate may be negotiated or waived in the sole discretion of Bull Oak.

Clients are generally requested to pay the estimated fee immediately upon execution of the client agreement. Clients may terminate their agreement at any time upon written notice. At the time of termination, any prepaid fees will be prorated based on the amount of work completed by Bull Oak as of the date the notice of termination is received and any unearned fees will be returned to the client. For purposes of calculating returns, all work performed up to the point of termination shall be calculated at our hourly fee of \$250.00 with any difference refunded to the client. It is possible that if the client seeks to terminate their agreement, and substantial work has been provided by Bull Oak, the client may not receive any return of the initial payment.

Portfolio Management Fees

Bull Oak is compensated for its Portfolio Management Services on a fee-only basis, assessed monthly, in arrears, based upon a percentage of the client's assets under management as of the close of business on the last business day of the preceding calendar month in accordance with the following annual percentages:

Asset-Based Fees for Portfolio Management

Total Assets Under Management	Annual Fee
\$0 - \$100,000	1.35%
\$100,001 - \$250,000	1.25%
\$250,001 - \$500,000	1.15%
\$500,001 - \$1,000,000	0.99%
\$1,000,001 - \$3,000,000	0.89%
\$3,000,001 - \$5,000,000	0.79%
\$5,000,001 - \$10,000,000	0.69%
\$10,000,001 - \$20,000,000	0.59%
\$20,000,001 and above	0.49%

Bull Oak calculates its fees using a linear schedule and not a tiered/progressive schedule. Bull Oak bills its clients on a monthly schedule.

Example:

If Bull Oak is managing \$2,400,000 of assets for Client's household, the annual fee rate of 0.89% would be $0.89\% / 12 = 0.07416\%$ as a monthly fee rate.

For purposes of calculating assets under management, Bull Oak will consider all investment management accounts that constitute "household" of the client's assets. Typically, a client's household consists of any spouse, parent, child, partner or sibling who resides at the same mailing address as the Client.

Certain legacy clients of Bull Oak are billed in accordance with a fee schedule that varies from the current fee schedule. These legacy clients were attained prior to January 2018, and may have assets held at custodians other than those recommended by Bull Oak. Exact fees and billing arrangements for such legacy clients are disclosed in each legacy client's respective client agreement.

Upon request from the client, and in the sole discretion of Bull Oak, the firm's Portfolio Management fees may be available on a flat fixed amount basis negotiated between the client and Bull Oak, and reflected as part of the client's agreement.

Bull Oak's Portfolio Management fees are generally negotiable and the final fee schedule is attached as Exhibit II of the client's Investment Advisory Agreement. Clients may terminate their agreement at any time by providing written 30 days' written notice to Bull Oak.

Clients who engage Bull Oak for Portfolio Management Services may receive the firm's Financial Planning and Consulting Services on a complimentary basis. Fees for Financial Planning and Consulting Services provided on a stand-alone basis are agreed to in writing before the firm renders its services.

Bull Oak typically charges a fixed fee for its Financial Planning and Consulting Services. Generally, depending upon the scope and complexity of the services provided, fixed fees typically range from \$3,500 to \$4,500. Customized proposals are available upon request. This rate may be negotiated or waived in the sole discretion of Bull Oak.

Clients are generally requested to pay the estimated fee in advance immediately upon execution of the client agreement.

Clients may terminate their agreement at any time upon written notice. At the time of termination, any prepaid fees will be prorated based on the amount of work completed by Bull Oak as of the date the notice of termination is received and any unearned fees will be returned to the client. For purposes of calculating returns, all work performed up to the point of termination shall be calculated at our hourly fee of \$250.00 with any difference refunded to the client. It is possible that if the client seeks to terminate their agreement, and substantial work has been provided by Bull Oak, the client may not receive any return of the initial payment.

B. Payment of Portfolio Management Fees

Asset-based Portfolio Management fees are withdrawn directly from the client's accounts by the custodian upon receiving client's written authorization on a monthly basis. Fees are paid in arrears.

In the event Bull Oak's services are terminated mid-month, Bull Oak is entitled to a pro rata fee for the days service was provided in the final month. This final fee is deducted from the client's account prior to transfer. The number of days the account was managed during the month until termination is used to determine the percentage of the management fee earned (based on the total number of days in the month).

For purposes of calculating assets under management, Bull Oak will consider all investment management accounts which constitute "household" of the client's assets. Typically, a client's household consists of any spouse, parent, child, partner or sibling who resides at the same mailing address as the client.

C. Client Responsibility For Third Party Fees

Clients are responsible for the payment of all third-party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by Bull Oak. Please see Item 12 of this brochure regarding broker-dealer/custodian.

D. Prepayment of Fees

Bull Oak collects its Portfolio Management fees in arrears. It does not collect such fees in advance.

E. Outside Compensation For the Sale of Securities to Clients

Neither Bull Oak nor its supervised persons accept any compensation for the sale of securities 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

Bull Oak does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

ITEM 7 - TYPES OF CLIENTS

Bull Oak generally provides advisory services to the following types of clients:

- Individuals
- High-Net-Worth Individuals
- Estates

Minimum Account Size:

Bull Oak generally requires a minimum initial investment of \$750,000 to open an account, which could be negotiable by Bull Oak in its sole discretion. However, Bull Oak reserves the right to accept or decline a potential client for any reason in its sole discretion.

ITEM 8 - METHODS OF ANALYSIS, INVESTMENT STRATEGIES, & RISK OF INVESTMENT LOSS

Bull Oak has constructed five client portfolios with the following investment strategies:

- **Conservative** - The Bull Oak Conservative risk-tolerance strategy attempts to earn stable returns with low levels of volatility over time while maintaining a focus on downside risk management. It is designed to benefit during periods where the economy is thriving. However, it also attempts to protect during periods of uncertainty and high levels of market volatility. The strategy provides diversification and balance and regularly offers exposure through the use of ETFs to U.S. and international stocks, bonds, and alternative asset classes, such as U.S. real estate, treasury inflation-protected securities, and commodities. However, equity exposure is modest, and emphasis is placed on fixed income securities. This strategy may be appropriate for investors with a low tolerance for risk.
- **Moderately Conservative** -The Bull Oak Moderately Conservative risk-tolerance strategy attempts to earn stable returns with low levels of volatility over time while accepting a small degree of risk and volatility to seek some degree of appreciation. It is designed to benefit during periods where the economy is thriving while protecting during periods of uncertainty and high levels of market volatility. The strategy provides diversification and balance and regularly offers exposure through the use of ETFs to U.S. and international stocks, bonds, and alternative asset classes, such as U.S. real estate, treasury inflation-protected securities, and commodities. However, equity exposure is modest, and emphasis is placed on fixed income securities. This strategy may be appropriate for investors with a low-to-moderate tolerance for risk.

- **Moderate** - The Bull Oak Moderate risk-tolerance strategy seeks to achieve equity-like returns while exhibiting less volatility and maximum drawdown over full market cycles. The strategy provides diversification and balance and regularly offers exposure through the use of ETFs to U.S. and international stocks, bonds, and alternative asset classes, such as U.S. real estate, treasury inflation-protected securities, and commodities. This strategy may be appropriate for investors with a time horizon greater than five years and who have a moderate tolerance for risk.
- **Moderately Aggressive** - The Bull Oak Moderately Aggressive risk-tolerance strategy seeks to achieve equity-like returns over full market cycles but with less risk. The strategy provides diversification and balance and regularly offers exposure through the use of ETFs to U.S. and international stocks, bonds, and alternative asset classes, such as U.S. real estate, treasury inflation-protected securities, and commodities. This strategy may be appropriate for investors who have a 7 to 13-year time horizon, a high tolerance for risk and an ability to withstand a permanent loss of capital.
- **Aggressive** - The Bull Oak Aggressive risk-tolerance strategy strives to aggressively take advantage of global capital market investment opportunities while exhibiting less volatility and maximum drawdown than conventional equity portfolios over full market cycles. The strategy provides diversification and balance and regularly offers exposure through the use of ETFs to U.S. and international stocks, bonds, and alternative asset classes, such as U.S. real estate, treasury inflation-protected securities, and commodities. This strategy may be appropriate for investors who have a 10 to 15-year time horizon, a substantial tolerance for risk and an ability to withstand a permanent loss of capital.

To construct client portfolios, Bull Oak employs a proprietary model combined with a disciplined review process to guide investment decisions and manage portfolio risk. Bull Oak uses published information from a large number of public data sources including but not limited to: the Economist, Bloomberg, CNBC, The Wall Street Journal, Seeking Alpha, S&P Capital IQ, ECRI, and Reuters.

Clients and prospective clients should be aware that investing in securities involves risk of loss that clients should be prepared to bear. The following is a sample of the types of risks Bull Oak clients should be aware of when Bull Oak manages their assets:

- **Strategy Risk:** There are the risks associated with the long-term core strategic holdings for each of the strategies. The more aggressive the Bull Oak strategy selected, the more likely the portfolio will contain larger weights in riskier asset classes, such as equities.
- **Model Risk:** There are distinct risks associated with Bull Oak portfolios' shorter-term dynamic allocations, which can result in more concentration of the portfolios towards a certain asset class or classes. This introduces the risk that Bull Oak could be on the wrong side of a tactical over- or under-weight, thus resulting in a drag on overall performance.
- **Systematic or Market Risk:** Bull Oak portfolios are invested in the global capital markets and are exposed to these markets. For example, if U.S. stocks decline, the portion of the Bull Oak portfolios invested in the U.S. stock market will decline. To a certain degree, Bull Oak tries to mitigate this risk by owning a wide variety of asset classes that are not perfectly correlated (or in some cases have zero or negative correlation).
- **Custodial Risk:** If the custodian of the account (TD Ameritrade or another custodian) were to go out of business, client assets may only protected up the SIPC limits.
- **Equity Risk:** investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value

of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environments.

- **Fixed-Income Risk:** investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best known securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.
- **Exchange Traded Funds (ETFs) Risk:** An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance. Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed “electronic shares” not physical metal) specifically may be negatively impacted by several unique factors, among them (1) large sales by the official sector which own a significant portion of aggregate world holdings in gold and other precious metals, (2) a significant increase in hedging activities by producers of gold or other precious metals, (3) a significant change in the attitude of speculators and investors.
- **Non-U.S. Security Risk:** Non-U.S. securities present certain risks such as currency fluctuation, political and economic change, social unrest, changes in government regulation, differences in accounting and the lesser degree of accurate public information available. Investments in emerging markets are generally more volatile than investments in developed foreign markets.

Tax Considerations: Bull Oak strategies are not designed to address specific tax objectives. Ongoing investment income, capital gains, capital losses, and miscellaneous deductions for some commodity ETFs are reported annually on the Schedule K-1, and when commodity ETFs are sold in a taxable account, proceeds will be reported on Form 1099-B. The Schedule K-1 is mailed separately to clients each year and needs to be included in the clients’ income tax return. In cases where the entity generating the Schedule K-1 files for a tax extension beyond April 15, clients may receive their Schedule K-1 after the due date for their income tax return. Individual taxpayers who do not request a filing extension may need to file an amended federal and/or state tax return if they receive their Schedule K-1 after filing their original return. Also, gains and losses associated with some commodities may be taxed differently than standard short-term and long-term capital gains and losses. Please consult your professional tax advisor for help with your unique situation. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

ITEM 9 - DISCIPLINARY INFORMATION

A. Criminal or Civil Actions

There are no criminal or civil actions to report.

B. Administrative Proceedings

There are no administrative proceedings to report.

C. Self-regulatory Organization (SRO) Proceedings

There are no self-regulatory organization proceedings to report.

ITEM 10 - OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

A. Registration as a Broker/Dealer or Broker/Dealer Representative

Neither Bull Oak nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer.

B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

Neither Bull Oak nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests

Neither Bull Oak nor its representatives have any material relationships to this advisory business that would present a possible conflict of interest.

All material conflicts of interest Under Section 260.238 (k) of the Corporations Code are disclosed regarding the investment adviser, its representatives or any of its employees, which could be reasonable expected to impair the rendering of unbiased and objective advice.

D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections

Bull Oak does not utilize nor select third-party investment advisers. All assets are managed by Bull Oak management.

ITEM 11 - CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

A. Code of Ethics

Bull Oak has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of

Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions.

Additionally, Bull Oak has adopted a Code of Professional Conduct as recommended by the CFA Institute, Asset Manager Code of Professional Conduct. Bull Oak's Code of Ethics is available free upon request to any client or prospective client.

- To act in a professional and ethical manner at all times
- To act for the benefit of clients
- To act with independence and objectivity
- To act with skill, competence, and diligence
- To communicate with clients in a timely manner and accurate manner
- To uphold the rules governing capital markets

B. Recommendations Involving Material Financial Interests

Bull Oak does not recommend that clients buy or sell any security in which a related person to Bull Oak or Bull Oak has a material financial interest.

C. Investing Personal Money in the Same Securities as Clients

In an effort to prevent conflicts of interest, it is the policy of Bull Oak that its associated persons are not permitted to invest in the same securities purchased for clients. Should this change in the future, Bull Oak will revise its Code of Ethics and update this Brochure accordingly.

D. Trading Securities At/Around the Same Time as Clients' Securities

Please see Item 11.C above.

ITEM 12 - BROKERAGE PRACTICES

A. Factors Used to Select Custodians and/or Broker/Dealers

Custodians/broker-dealers will be recommended based on Bull Oak's duty to seek "best execution," which is the obligation to seek execution of securities transactions for a client on the most favorable terms for the client under the circumstances. Clients will not necessarily pay the lowest commission or commission equivalent, and Bull Oak may also consider the market expertise and research access provided by the dealer/custodian, including but not limited to access to written research, oral communication with analysts, admittance to research conferences and other resources provided by the brokers that may aid in Bull Oak's research efforts. Bull Oak will never charge a premium or commission on transactions, beyond the actual cost imposed by the broker-dealer/custodian.

Bull Oak recommends TD Ameritrade Institutional, Inc.

1. Research and Other Soft-Dollar Benefits

While Bull Oak has no formal soft dollars program in which soft dollars are used to pay for third party services, Bull Oak may receive research, products, or other services from custodians and broker-dealers in connection with client securities transactions (“soft dollar benefits”). Bull Oak may enter into soft-dollar arrangements consistent with (and not outside of) the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended. There can be no assurance that any particular client will benefit from soft dollar research, whether or not the client’s transactions paid for it, and Bull Oak does not seek to allocate benefits to client accounts proportionate to any soft dollar credits generated by the accounts. Bull Oak benefits by not having to produce or pay for the research, products or services, and Bull Oak will have an incentive to recommend a broker-dealer based on receiving research or services. Clients should be aware that Bull Oak’s acceptance of soft dollar benefits may result in higher commissions charged to the client.

2. Brokerage for Client Referrals

Bull Oak receives 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

Bull Oak will require clients to use a specific broker-dealer to execute transactions.

B. Aggregating (Block) Trading for Multiple Client Accounts

Bull Oak may aggregate or bunch securities to be purchased or sold for multiple clients. This may, but not always, result in less favorable prices, particularly for illiquid securities or during volatile market conditions. Bull Oak does not typically invest in illiquid securities (average daily volume <50k).

ITEM 13 - REVIEWS OF ACCOUNTS

A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews

All client portfolio management accounts are reviewed at least annually only by either a Portfolio Manager or a Wealth Manager of Bull Oak Capital, LLC with regard to clients’ respective investment policies and risk tolerance levels. All accounts at Bull Oak are assigned to either a Wealth Advisor and/or a Wealth Manager.

B. Factors That Will Trigger a Non-Periodic Review of Client Accounts

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

C. Content and Frequency of Regular Reports Provided to Clients

Each client will receive a quarterly report detailing the client’s account, including assets held, asset value, and calculation of fees. This written report will come from the custodian. It is the responsibility of the client to verify the accuracy of the calculation of fees presented in such reports as the custodian will not determine whether the fees charged to the client’s account are accurate or have been properly calculated.

ITEM 14 - CLIENT REFERRALS AND OTHER COMPENSATION

A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)

Bull Oak does not receive any economic benefit, directly or indirectly from any third party for advice rendered to Bull Oak's clients.

B. Compensation to Non – Advisory Personnel for Client Referrals

Bull Oak does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

ITEM 15 - CUSTODY

When advisory fees are deducted directly from client accounts at client's custodian, Bull Oak will be deemed to have limited custody of client's assets and must have written authorization from the client to do so. Clients will receive all account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy. Clients should understand that it is their responsibility to ensure that the fee calculation is correct, and not the custodian. Specifically, each time a fee is directly deducted from a client account, Bull Oak will concurrently:

- send the qualified custodian an invoice or statement of the amount of the fee to be deducted from the client's account; and
- send the client an invoice or statement itemizing the fee, including the formula used to calculate the fee, the value of the assets under management on which the fee is based, and the time period covered by the fee.

ITEM 16 - INVESTMENT DISCRETION

Bull Oak provides discretionary to clients. The Investment Advisory Contract established with each client sets forth the discretionary authority for trading. Where investment discretion has been granted, Bull Oak generally manages the client's account and makes investment decisions without consultation with the client as to when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, what securities to buy or sell, or the price per share.

ITEM 17 - VOTING CLIENT SECURITIES (PROXY VOTING)

Bull Oak will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security. Additionally, Bull Oak does not advise or act for Clients with respect to any legal matters, including bankruptcies and class actions, for the securities held in Clients' accounts.

ITEM 18 - FINANCIAL INFORMATION

A. Balance Sheet

Bull Oak neither requires nor solicits prepayment of more than \$500 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

Neither Bull Oak nor its management has any financial condition that is likely to reasonably impair Bull Oak's ability to meet contractual commitments to clients.

C. Bankruptcy Petitions in Previous Ten Years

Bull Oak has not been the subject of a bankruptcy petition in the last ten years.

ITEM 19 - REQUIREMENTS FOR STATE REGISTERED ADVISERS

A. Principal Executive Officers and Management Persons; Their Formal Education and Business Background

Bull Oak currently has only one management person: Ryan Anthony Hughes. Education and business background can be found on the Form ADV Part 2B brochure supplement for such individual.

B. Other Businesses in Which This Advisory Firm or its Personnel are Engaged and Time Spent on Those (If Any)

Other business activities for each relevant individual can be found in Item 10 above, as well on the Form ADV Part 2B brochure supplement for each such individual.

C. How Performance-based Fees are Calculated and Degree of Risk to Clients

Bull Oak does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

D. Material Disciplinary Disclosures for Management Persons of this Firm

There are no civil, self-regulatory organization, or arbitration proceedings to report under this section.

E. Material Relationships That Management Persons Have With Issuers of Securities (If Any)

Bull Oak, nor Ryan Hughes, have any relationship or arrangement with issuers of securities. See Item 10.C and 11.B. Material conflicts of interest relating to Bull Oak and its associate, which would be reasonably expected to impair the rendering of unbiased and objective advice, have been disclosed herein.



BULL OAK CAPITAL, LLC

Firm Brochure - Form ADV Part 2B



Individual Disclosure Brochure
for
Ryan A. Hughes, MBA

Personal CRD Number: 5430536
Investment Adviser Representative

This brochure supplement provides information about Ryan A. Hughes that supplements the Bull Oak Capital brochure. You should have received a copy of that brochure. Please contact Ryan Anthony Hughes if you did not receive Bull Oak Capital's brochure or if you have any questions about the contents of this supplement. Additional information about Ryan Anthony Hughes is also available on the SEC's website at www.adviserinfo.sec.gov.

4747 Executive Drive, Suite 1010
San Diego, CA 92121
(858) 999-3550
www.bulloakcapital.com
info@bulloakcapital.com

Version Date: 4/25/19

ITEM 2 - EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Ryan A. Hughes, MBA

Year of Birth: 1982

Educational Background

MBA, Finance - UCLA Anderson School of Management – 2014

J. Fred Weston Award – Academic Excellence in Finance

GAP Fellows Award – Top Thesis Member (Top 5% of class)

B.S., Business Administration - University of Southern California (USC) – 2007

Schoen Family Scholarship

Lloyd Grief Center – Top 10 Business Plan

Business Background

01/2014 – Present

Founder & CEO

Bull Oak Capital
San Diego, CA

09/2015 – 02/2015

MBA Thesis Assistant – Financial Modeling

UCLA Anderson School of Management
Los Angeles, CA

07/2012 – 03/2014

Graduate Student – MBA Studies

UCLA Anderson School of Management
Los Angeles, CA

04/2010 - 07/2012

Vice President – Financial Advisor

Charles Schwab and Co.
Woodland Hills, CA

10/2008 - 04/2010	Financial Advisor Morgan Stanley and Co. Valencia, CA
01/2008 - 10/2008	Junior Partner - Financial Advisor Merrill Lynch and Co. Beverly Hills, CA
08/2005 - 12/2007	Undergraduate Student University of Southern California (USC) Los Angeles, CA
7/2000 – 7/2004	2nd Class Petty Officer United States Navy San Diego, CA

ITEM 3 - DISCIPLINARY INFORMATION

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business.

ITEM 4 - OTHER BUSINESS ACTIVITIES

Ryan A. Hughes is not engaged in any investment-related business or occupation (other than this advisory firm).

ITEM 5 - ADDITIONAL COMPENSATION

Other than salary, annual bonuses, or regular bonuses, Ryan A. Hughes does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through Bull Oak Capital.

ITEM 6 - SUPERVISION

As the only owner and representative of Bull Oak Capital, Ryan A. Hughes supervises all activities of the firm. Ryan A. Hughes's response information is on the cover page of this disclosure document.

ITEM 7 - REQUIREMENTS FOR STATE REGISTERED ADVISERS

Ryan A. Hughes has NOT been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.

