

## Uniform Application for Investment Adviser Registration

## Part II - Page 1

Name of Investment Adviser: <b>SYM Financial Corporation</b>				
Address: (Number and Street)	(City)	(State)	(Zip Code)	Area Code: Telephone number:
100 Capital Drive	Warsaw	IN	46582	(574) 267-2300

This part of Form ADV gives information about the investment adviser and its business for the use of clients.  
The information has not been approved or verified by any governmental authority.

## Table of Contents

<u>Item Number</u>	<u>Item</u>	<u>Page</u>
1	Advisory Services and Fees . . . . .	2
2	Types of Clients . . . . .	2
3	Types of Investments . . . . .	3
4	Methods of Analysis, Sources of Information and Investment Strategies . . . . .	3
5	Education and Business Standards . . . . .	4
6	Education and Business Background . . . . .	4
7	Other Business Activities . . . . .	4
8	Other Financial Industry Activities or Affiliations . . . . .	4
9	Participation or Interest in Client Transactions . . . . .	5
10	Conditions for Managing Accounts . . . . .	5
11	Review of Accounts . . . . .	5
12	Investment or Brokerage Discretion . . . . .	6
13	Additional Compensation . . . . .	6
14	Balance Sheet . . . . .	6
	Continuation Sheet . . . . .	Schedule F
	Balance Sheet, if required . . . . .	Schedule G

(Schedules A, B, C, D, and E are included with Part I of this Form, for the use of regulatory bodies, and are not distributed to clients.)

Potential persons who are to respond to the collection of information contained in this form  
are not required to respond unless the form displays a currently valid OMB control number.

1. **A. Advisory Services and Fees.** (check the applicable boxes)

For each type of service provided, state the approximate % of total advisory billings from that service.  
(See instructions below.)

Applicant:

<input checked="" type="checkbox"/>	(1)	Provides investment supervisory services . . . . .	<b>60 %</b>
<input checked="" type="checkbox"/>	(2)	Manages investment advisory accounts not involving investment supervisory services . . . . .	<b>5 %</b>
<input checked="" type="checkbox"/>	(3)	Furnishes investment advice through consultations not included in either service described above . . . . .	<b>5 %</b>
<input type="checkbox"/>	(4)	Issues periodicals about securities by subscription . . . . .	%
<input type="checkbox"/>	(5)	Issues special reports about securities not included in any service described above . . . . .	%
<input type="checkbox"/>	(6)	Issues, not as part of any service described above, any charts, graphs, formulas, or other devices which clients may use to evaluate securities . . . . .	%
<input checked="" type="checkbox"/>	(7)	On more than an occasional basis, furnishes advice to clients on matters not involving securities . . . . .	<b>30 %</b>
<input type="checkbox"/>	(8)	Provides a timing service . . . . .	%
<input type="checkbox"/>	(9)	Furnishes advice about securities in any manner not described above . . . . .	%

(Percentages should be based on applicant's last fiscal year. If applicant has not completed its first fiscal year, provide estimates of advisory billings for that year and state that the percentages are estimates.)

B. Does applicant call any of the services it checked above financial planning or some similar term? . . . . .

Yes ☒ No ☐

C. Applicant offers investment advisory services for: (check all that apply)

- |  |  |
|--|--|
| <input checked="" type="checkbox"/> (1) A percentage of assets under management      | <input type="checkbox"/> (4) Subscription fees |
| <input checked="" type="checkbox"/> (2) Hourly charges                               | <input type="checkbox"/> (5) Commissions       |
| <input checked="" type="checkbox"/> (3) Fixed Fees (not including subscription fees) | <input type="checkbox"/> (6) Other             |

D. For each checked box in A above, describe on Schedule F:

- the services provided, including the name of any publication or report issued by the adviser on a subscription basis or for a fee
- applicant's basic fee schedule, how fees are charged and whether its fees are negotiable
- when compensation is payable, and if compensation is payable before service is provided, how a client may get a refund or may terminate an investment advisory contract before its expiration date

2. **Types of clients** - Applicant generally provides investment advice to: (check those that apply)

- |   |  |
|---|--|
| <input checked="" type="checkbox"/> A. Individuals                      | <input checked="" type="checkbox"/> E. Trusts, estates, or charitable organizations                    |
| <input type="checkbox"/> B. Banks or thrift institutions                | <input checked="" type="checkbox"/> F. Corporations or business entities other than those listed above |
| <input type="checkbox"/> C. Investment companies                        | <input type="checkbox"/> G. Other (describe on Schedule F)   |
| <input checked="" type="checkbox"/> D. Pension and profit sharing plans |  |

**3. Types of Investments.** Applicant offers advice on the following: (check those that apply)

- |  |  |
|--|--|
| <input checked="" type="checkbox"/> A. Equity securities                                       | <input checked="" type="checkbox"/> H. United States government securities |
| <input checked="" type="checkbox"/> (1) exchange-listed securities                             | I. Options contracts on:   |
| <input checked="" type="checkbox"/> (2) securities traded over-the-counter                     | <input checked="" type="checkbox"/> (1) securities                         |
| <input checked="" type="checkbox"/> (3) foreign issuers  | <input checked="" type="checkbox"/> (2) commodities                        |
| <input checked="" type="checkbox"/> B. Warrants  | J. Futures contracts on:   |
| <input checked="" type="checkbox"/> C. Corporate debt securities (other than commercial paper) | <input checked="" type="checkbox"/> (1) tangibles                          |
| <input checked="" type="checkbox"/> D. Commercial paper  | <input checked="" type="checkbox"/> (2) intangibles                        |
| <input checked="" type="checkbox"/> E. Certificates of deposit                                 | K. Interests in partnerships investing in:                                 |
| <input checked="" type="checkbox"/> F. Municipal securities                                    | <input checked="" type="checkbox"/> (1) real estate                        |
| G. Investment company securities:  | <input checked="" type="checkbox"/> (2) oil and gas interests              |
| <input checked="" type="checkbox"/> (1) variable life insurance                                | <input checked="" type="checkbox"/> (3) other (explain on Schedule F)      |
| <input checked="" type="checkbox"/> (2) variable annuities                                     | <input checked="" type="checkbox"/> L. Other (explain on Schedule F)       |
| <input checked="" type="checkbox"/> (3) mutual fund shares                                     |  |

**4. Methods of Analysis, Sources of Information, and Investment Strategies.**

## A. Applicant's security analysis methods include: (check those that apply)

- |   |   |
|---|---|
| (1) <input type="checkbox"/> Charting               | (4) <input type="checkbox"/> Cyclical                                 |
| (2) <input checked="" type="checkbox"/> Fundamental | (5) <input checked="" type="checkbox"/> Other (explain on Schedule F) |
| (3) <input checked="" type="checkbox"/> Technical   |   |

## B. The main sources of information applicant uses include: (check those that apply)

- |   |   |
|---|---|
| (1) <input checked="" type="checkbox"/> Financial newspapers and magazines    | (5) <input type="checkbox"/> Timing services  |
| (2) <input checked="" type="checkbox"/> Inspections of corporate activities   | (6) <input checked="" type="checkbox"/> Annual reports, prospectuses, filings with the Securities and Exchange Commission |
| (3) <input checked="" type="checkbox"/> Research materials prepared by others | (7) <input checked="" type="checkbox"/> Company press releases  |
| (4) <input checked="" type="checkbox"/> Corporate rating services             | (8) <input type="checkbox"/> Other (explain on Schedule F)  |

## C. The investment strategies used to implement any investment advice given to clients include: (check those that apply)

- |  |  |
|--|--|
| (1) <input checked="" type="checkbox"/> Long term purchases<br>(securities held at least a year) | (5) <input checked="" type="checkbox"/> Margin transactions  |
| (2) <input checked="" type="checkbox"/> Short term purchases<br>(securities sold within a year)  | (6) <input checked="" type="checkbox"/> Option writing, including covered options, uncovered options or spreading strategies |
| (3) <input type="checkbox"/> Trading (securities sold within 30 days)                            | (7) <input type="checkbox"/> Other (explain on Schedule F)   |
| (4) <input checked="" type="checkbox"/> Short sales  |  |

**5. Education and Business Standards.**

Are there any general standards of education or business experience that applicant requires of those involved in determining or giving investment advice to clients? . . . . .

Yes No  
☒ ☐

(If yes, describe these standards on Schedule F.)

**6. Education and Business Background**

For:

- each member of the investment committee or group that determines general investment advice to be given to clients, or
- if the applicant has no investment committee or group, each individual who determines general investment advice given to clients (if more than five, respond only for their supervisors)
- each principal executive officer of applicant or each person with similar status or performing similar functions.

On Schedule F, give the:

- name
- formal education after high school
- year of birth
- business background for the preceding five years

**7. Other Business Activities.** (check those that apply)

- ☒ A. Applicant is actively engaged in a business other than giving investment advice.
- ☒ B. Applicant sells products or services other than investment advice to clients.
- ☐ C. The principal business of applicant or its principal executive officers involves something other than providing investment advice.

(For each checked box describe the other activities, including the time spent on them, on Schedule F.)

**8. Other Financial Industry Activities or Affiliations.** (check those that apply)

- ☐ A. Applicant is registered (or has an application pending) as a securities broker-dealer.
- ☐ B. Applicant is registered (or has an application pending) as a futures commission merchant, commodity pool operator or commodity trading adviser.
- C. Applicant has arrangements that are material to its advisory business or its clients with a related person who is a:
- |  |  |
|--|--|
| <input type="checkbox"/> (1) broker-dealer   | <input checked="" type="checkbox"/> (7) accounting firm                            |
| <input type="checkbox"/> (2) investment company  | <input type="checkbox"/> (8) law firm  |
| <input checked="" type="checkbox"/> (3) other investment adviser   | <input checked="" type="checkbox"/> (9) insurance company or agency                |
| <input type="checkbox"/> (4) financial planning firm   | <input type="checkbox"/> (10) pension consultant                                   |
| <input type="checkbox"/> (5) commodity pool operator, commodity trading advisor or futures commission merchant | <input type="checkbox"/> (11) real estate broker or dealer                         |
| <input checked="" type="checkbox"/> (6) banking or thrift institution  | <input type="checkbox"/> (12) entity that creates or packages limited partnerships |

(For each checked in box in C, on Schedule F identify the related person and describe the relationship and the arrangements.)

- D. Is applicant or a related person a general partner in any partnership in which clients are solicited to invest? Yes No  
☐ ☒

(If yes, describe on Schedule F the partnerships and what they invest in.)

9. **Participation or Interest in Client Transactions.**

Applicant or a related person: (check those that apply)

- ☐ A. As principal, buys securities for itself from or sells securities it owns to any client.
- ☒ B. As broker or agent effects securities transactions for compensation for any client.
- ☐ C. As broker or agent for any person other than a client effects transactions in which client securities are sold to or bought from a brokerage customer.
- ☒ D. Recommends to clients that they buy or sell securities or investment products in which the applicant or a related person has some financial interest.
- ☒ E. Buys or sells for itself securities that it also recommends to clients.

(For each box checked, describe on Schedule F when the applicant or a related person engages in these transactions and what restrictions, internal procedures, or disclosures are used for conflicts of interest in those transactions.)

10. **Conditions for Managing Accounts.** Does the applicant provide investment supervisory services, manage investment advisory accounts or hold itself out as providing financial planning or some similarly termed services and impose a minimum dollar value of assets or other conditions for starting or maintaining an account? . . . . .

Yes



No



(If yes, describe on Schedule F)

11. **Review of Accounts.** If applicant provides investment supervisory services, manages investment advisory accounts, or holds itself out as providing financial planning or some similarly termed services:

- A. Describe below the reviews and reviewers of the accounts. **For reviews**, include their frequency, different levels, and triggering factors. **For reviewers**, include the number of reviewers, their titles and functions, instructions they receive from applicant on performing reviews, and number of accounts assigned each.

**SYM reviews its clients' managed accounts on a regular, on-going basis. SYM conducts formal account reviews each calendar quarter and at each formal client meeting. Formal client meetings occur according to the terms provided in the client engagement agreement and at the clients' request. The SYM Investment Committee, as well as the Financial Advisor assigned to the particular client, formally conducts reviews and such reviews are supported by the Client Service Team. The review considers the clients' individually prepared Investment Policy Statement. Applicant has thirteen (13) Financial Advisors and a service team consisting of ten (10) individuals assigned to work with approximately 550 client household accounts.**

- B. Describe below the nature and frequency of regular reports to clients on their accounts.

**Most clients of SYM receive the similar service in this regard. In addition to the reports and services provided by SYM, clients receive follow-up written confirmation of account transactions and updated account statements from the custodian of the managed assets on a monthly or quarterly basis.**

## 12. Investment or Brokerage Discretion.

A. Does applicant or any related person have authority to determine, without obtaining specific client consent, the:

- |  |                                     |                          |
|--|-------------------------------------|--------------------------|
|  | Yes                                 | No                       |
| (1) securities to be bought or sold? .....               | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|  | Yes                                 | No                       |
| (2) amount of the securities to be bought or sold? ..... | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|  | Yes                                 | No                       |
| (3) broker or dealer to be used? .....                   | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|  | Yes                                 | No                       |
| (4) commission rates paid? .....                         | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

B. Does applicant or a related person suggest brokers to clients? .....

Yes	No
<input checked="" type="checkbox"/>	<input type="checkbox"/>

For each yes answer to A describe on Schedule F any limitations on the authority. For each yes to A(3), A(4) or B, describe on Schedule F the factors considered in selecting brokers and determining the reasonableness of their commissions. If the value of products, research and services given to the applicant or a related person is a factor, describe:

- the products, research and services
- whether clients may pay commissions higher than those obtainable from other brokers in return for those products and Services
- whether research is used to service all of applicant's accounts or just those accounts paying for it; and
- any procedures the applicant used during the last fiscal year to direct client transactions to a particular broker in return for product and research services received.

## 13. Additional Compensation.

Does the applicant or a related person have any arrangements, oral or in writing, where it:

- |    |  |                                     |                          |
|----|--|-------------------------------------|--------------------------|
| A. | is paid cash by or receives some economic benefit (including commissions, equipment or non-research services) from a non-client in connection with giving advice to clients? ..... | Yes                                 | No                       |
|    |  | X                                   | <input type="checkbox"/> |
|    |  | Yes                                 | No                       |
| B. | directly or indirectly compensates any person for client referrals? .....  | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

(For each yes, describe the arrangements on Schedule F.)

## 14. Balance Sheet. Applicant must provide a balance sheet for the most recent fiscal year on Schedule G if applicant:

- has custody of client funds or securities; or
- requires prepayment of more than \$500 in fees per client and 6 or more months in advance

Has applicant provided a Schedule G balance sheet? .....	Yes	No
	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Schedule F of  
Form ADV**

**Continuation Sheet for Form ADV Part II**

Applicant:	SEC File Number:	Date:
<b>SYM Financial Corporation</b>	<b>801-23944</b>	<b>08/21/2009</b>

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: <b>SYM Financial Corporation</b>		IRS Empl. Ident. No.:
Item of Form (identify)	Answer	
Item 1.(A-D)	<p><b>SERVICES AND FEES</b></p> <p>SYM Financial Corporation provides comprehensive wealth management advisory services to individuals and tactical portfolio management advice to individuals, institutions, charities, and pension plans. Compensation for such work is provided on a fee basis calculated as a percentage of investable assets or net worth, flat fees and hourly fees. Fees for services are quoted in advance of the client relationship and are reflective of the relative amount and complexity of the work involved in servicing the client. The compensation method is explained and agreed with the clients in advance and reduced to a written agreement before any services are rendered. Percentage fees range up to 1% of investable assets or net worth; hourly fees range up to \$250.</p> <p>For wealth management services there is a fee typically ranging up to \$10,000 in addition to the asset based management fee. Clients are billed quarterly and the account value is determined using trade date plus any accrued interest. As a result, the value may vary from that reported on their custodian statement. Pursuant to the written fee agreement, clients may terminate the relationship at any time and receive a pro-rata refund.</p> <p>Additionally SYM Financial provides planning services on a project basis. Advice is rendered in the areas of cash flow planning for individuals and business, debt management, risk management, college funding, retirement planning, estate planning, tax planning, asset allocation, investment selection, employee stock option strategies, 401(k) advising, employee benefit planning, business consulting, and business succession planning. All projects begin with a data gathering interview then conclude with a presentation and detailed written analyses and recommendation over each area SYM was engaged to provide advice. Periodic financial check-ups are recommended and it is the Client's responsibility to initiate this review. Project fees range from \$200 - \$10,000 and are typically completed in less than 6 months.</p> <p>In some cases, depending on the circumstances, fees may be negotiable.</p> <p><b>PROXY VOTING</b></p> <p>SYM does not vote proxies for any client. SYM informs client upfront that we will not provide this service.</p> <p><b>PRIVACY</b></p> <p>SYM values the privacy of its clients and takes its responsibility seriously. SYM's privacy policy is delivered to prospects, new clients and existing clients annually. The privacy policy describes the collection of information, restrictions of disclosure, legal disclosure standards, online privacy, and security measures.</p>	
Item 3	<p><b>TYPES OF INVESTMENTS</b></p> <p>Interests in Partnerships: From time to time, applicant has provided advice concerning partnership interests in miscellaneous businesses.</p> <p>Other types of Investments: From time to time, applicant has provided advice concerning investments in tangible assets such as gold and silver.</p>	
Item 4(A-C)	<p><b>METHODS OF ANALYSIS, SOURCES OF INFORMATION, AND INVESTMENT STRATEGIES</b></p> <p>Philosophy: Top Down Tactical Asset Allocation. "Top down" means analyzing market conditions and selecting investments that we believe will do well in those conditions. "Tactical" means strategically overweighing those asset classes we believe will do well in the future. "Asset Allocation" means we believe diversification of asset categories is key to long-term success.</p> <p>Process: SYM Financial works with each client to develop an Investment Policy Statement (IPS) that aligns with the stated objectives. The objective behind the IPS is to allow the advisor to</p>	

**Schedule F of  
Form ADV****Continuation Sheet for Form ADV Part II**

Applicant:

**SYM Financial Corporation**

SEC File Number:

**801-23944**

Date:

**08/21/2009**

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1.	Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: <b>SYM Financial Corporation</b>	IRS Empl. Ident. No.:
Item of Form (identify)	Answer	
	<p>critically understand 3 issues: (1) Risk Tolerance; (2) Portfolio Objectives; and (3) Investment time frame. As the advisor understands those issues, it will be clear which investment portfolio strategy is best suited for the client. From that point, we customize the portfolio as necessary to meet our client long-term investment objectives.</p> <p>Performance: SYM Financial Corporation actively watches the market, advises clients, and manages investment portfolios to deliver value to our clients. SYM provides quarterly performance reports so clients can clearly determine the value added by a relationship with SYM.</p>	
Item 5	<b>EDUCATION AND BUSINESS STANDARDS</b>  SYM requires that all individuals involved in determining or giving investment advice to clients possess the highest ethical standards and technical abilities necessary to meet the needs of those who retain our services. Generally, this would include a minimum of a graduate degree or post-graduate education certificate (i.e., Certified Financial Planner, Chartered Financial Analyst and/or Certified Public Accountant).	
Item 6	<b>EDUCATION AND BUSINESS BACKGROUND</b>  Education and Business Background:  <b>George S. Wolfson</b> Year of Birth: 1955 Formal Education After High School: Graduated from Indiana University, South Bend and Bloomington, Indiana 1993. Business Background for Last 5 Years: 2000 to present-SeniorVP, South Bend Division for SYM Financial Corporation. Mr. Wolfson also serves on the Investment Committee. 1995 to 2000-Management and Sales for Charles Schwab.  <b>Jerald W. Yeager</b> Year of Birth: 1964 Formal Education After High School: Graduated from Taylor University, Upland, Indiana 1987. Graduated from Indiana University School of Law-Indianapolis 1990. Business Background for Last 5 Years: 1997 – 2002 Senior VP of Financial Advisory Services of SYM Financial Since 2002, Mr. Yeager has been the CEO of SYM Financial Corporation, Warsaw, Indiana. 2003-2005 Mr. Yeager has been the CCO of SYM Financial Corporation  <b>Neil M. Donahoe</b> Year of Birth: 1959 Formal Education After High School: Attended Trinity University, San Antonio, Texas 1977-1979. Graduated from Purdue University, West Lafayette, Indiana 1981. 1996 Received a Masters degree in Financial Planning, College for Financial Planning Business Background for Last 5 Years: Since 1987, Mr. Donahoe has been an advisor at SYM Financial Corporation, Warsaw. Since 1994, Mr. Donahoe has been the Senior Vice President and Chief Investment Officer and leads the Investment Committee. Mr. Donahoe has been the CCO since March 2005  <b>Rodney S. Coleman</b> Year of Birth: 1969 Formal Education After High School: Graduated from United States Naval Academy, Annapolis, Maryland 1991. Graduated University of Chicago MBA, 2004	



**Schedule F of  
Form ADV**

**Continuation Sheet for Form ADV Part II**

Applicant:

**SYM Financial Corporation**

SEC File Number:

**801-23944**

Date:

**08/21/2009**

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV:

**SYM Financial Corporation**

IRS Empl. Ident. No.:

Item of Form  
(identify)

Answer

Item 6 continued

Business Background for Last 5 Years:  
1987 to 2000-United States Navy, Aviation.  
2000 – 2002 Managing Advisor for SYM Financial Corporation  
2002 to present-Mr. Coleman has been the Senior VP of Financial Advisory Services of SYM Financial Corporation. Mr. Coleman also serves on the Investment Committee.

**Stephen C. Yeager**

Year of Birth: 1967

Formal Education After High School:

BS Economics—United States Naval Academy (1990)

MBA—College of William and Mary (2000)

Business Background for Last 5 Years:

2000-Present Senior Vice President—SYM Financial Corporation

**Schedule F of  
Form ADV****Continuation Sheet for Form ADV Part II**

Applicant:

**SYM Financial Corporation**

SEC File Number:

**801-23944**

Date:

**08/21/2009**

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1.	Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: <b>SYM Financial Corporation</b>	IRS Empl. Ident. No.:
Item of Form (identify)	Answer	
Item 7(A, B & C)	<b>OTHER BUSINESS ACTIVITIES</b> In addition to portfolio management services, SYM delivers valuable advice in the areas of estate planning, financial planning, retirement planning, risk management, education planning, 401(k) consulting, and employee benefits for our individual clients. SYM also delivers a high level of customized services in the areas SYM advises clients.  SYM bills a fee and/or receives commissions for the advice and services provided to business owners. For individuals, SYM primarily charges a fee for its advisory services, but may receive commissions in the areas of risk management (insurance planning/annuities).	
Item 8	<b>OTHER FINANCIAL INDUSTRY ACTIVITIES OR AFFILIATIONS:</b>	
Item 8(C)6	SYM Financial Corp has a minority ownership interest in a savings and loan holding company, National Advisors Holdings, Inc. (NAH) that has formed a federally chartered trust company, "National Advisors Trust Company" (NATC). NAH and NATC are regulated by the Office of Thrift Supervision. The trust company intends to provide a low cost alternative to traditional trust service providers, and SYM Financial Corp intends to refer clients to NATC for trust services, where appropriate.	
Item 8(C)7	<p>Krugger Lawton and Company: In the beginning of 2001, SYM Financial Corporation announced a strategic alliance with Krugger Lawton and Company, an accounting firm. The Krugger/SYM Advantage, LLC has been formed to facilitate a joint venture for cross-referral of clients. This is a special business alliance whereby clients of Krugger Lawton and Company will have immediate access to the full scope of investment advisory and wealth management services provided by SYM, and the clients of SYM will likewise have access to the accounting services provided by Krugger Lawton and Company.</p> <p>Krugger/SYM Advantage, LLC is physically separate from, but located within the same building as, the corporate headquarters of Krugger Lawton and Company in South Bend, Indiana. As the opportunities expand throughout SYM and Krugger Lawton's extensive client base, Krugger/SYM Advantage, LLC will continually monitor the needs of the clients and respond accordingly.</p> <p>SYM Financial Corporation and Krugger Lawton and Company will remain completely separate and independent organizations. This strategic alliance provides the ability for SYM and Krugger Lawton to increase the scope of services offered to their respective existing clients.</p> <p>This agreement is in no way intended to prohibit either Krugger Lawton and Company or SYM Financial Corporation from entering other relationships, including joint venture agreements, or from referring clients to other accounting or financial advisory firms.</p>	
Item 9	<b>PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS</b>  On occasion, and always in the best interests of its advisory clients, certain of SYM's IAR's, in their individual capacities as registered representatives of Gradient Securities LLC, have the authority to implement investment recommendations on a fully-disclosed commission basis. In the event that a client chooses to implement investment recommendations or purchase insurance products through any of Registrant's IAR's as described above, brokerage and/or insurance commissions will be charged. SYM's Gradient Securities LLC registered representatives do not keep any portion of commissions earned. Therefore they do not have the incentive to recommend	

**Schedule F of  
Form ADV****Continuation Sheet for Form ADV Part II**

Applicant:

**SYM Financial Corporation**

SEC File Number:

**801-23944**

Date:

**08/21/2009**

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1.	Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: <b>SYM Financial Corporation</b>	IRS Empl. Ident. No.:
Item of Form (identify)	Answer	
	<p>or sell products that is present in typical broker dealer relationships. The brokerage commissions charged by Gradient Securities LLC may be higher or lower than those charged by other broker-dealers. With respect to commission mutual fund purchases, Gradient, may also receive additional ongoing 12b-1 trailing commission compensation directly from the mutual fund company during the period that the client maintains the mutual fund investment.</p> <p>SYM Financial Corporation and/or related persons may from time to time invest in securities or investment products that SYM and such related persons may also recommend to clients. Typically, neither SYM nor its related persons receive any direct financial compensation by recommending investment products in which SYM or related persons sells its or his personal interest in any investment product, nor directly purchases the client's financial interest in any investment product. SYM and/or related persons are not permitted to "front-run", self-deal, utilize insider information, or otherwise participate in or effect transactions that would potentially cause damage or harm to a client account. Participation in securities transactions or partnerships in which clients also participate is fully disclosed by the disclosure contained in SYM's Form ADV.</p> <p><b>CODE OF ETHICS</b> SYM has adopted a Code of Ethics. This code contains standards of business conduct for all employees of SYM, including, but not limited to: fiduciary responsibilities, standards of ethical conduct required for all employees, and SYM's commitment to ensuring that these standards will be maintained. SYM has adopted Policies and Procedures that address all these potential conflicts. A copy of this code is available to any client or prospective client upon request.</p>	
Item 10	<p><b>CONDITIONS FOR MANAGING ACCOUNTS</b></p> <p>SYM provides financial advisory services including tactical asset allocation portfolio management, investment supervisory services, comprehensive wealth management and strategic financial planning services. SYM has no strict minimum or specific conditions in which it will work with clients. Generally, SYM will thoroughly evaluate a prospective client situation prior to making a proposal to provide any of the financial advisory services stated above. If SYM determines that SYM can provide value to the prospective client, they will make a proposal to provide financial advisory services. If the prospective client does not believe the proposed fee is justified for the financial advisory services, then SYM and the prospective client will not enter into a financial advisory relationship.</p>	
Item 12(A) & (B)	<p><b>INVESTMENT OR BROKERAGE DISCRETION</b></p> <p>SYM has been granted the authority by a substantial majority of its clients to determine, without specific consent, the securities to be bought or sold, the amounts of those securities, and the brokers or dealers utilized to effect those trades. Any limitations which might be placed on SYM are "client specific" and, to the extent that they exist, are detailed in the client's Investment Policy Statement.</p> <p><b>BEST EXECUTION</b> In selecting broker-dealers to be used in portfolio transactions, SYM's guiding principle is to seek to obtain the best overall execution for each client on each trade. SYM considers a number of factors, including, without limitation, the actual handling of the order, the ability of the broker to settle the trade promptly and accurately, the financial standing of the broker, the ability of the broker to commit capital, SYM's past experience with similar trades and other factors that may be unique to a particular order. In recognition of the value of these judgmental factors, SYM may pay a brokerage commission that is higher than the lowest commission that might otherwise be available for any given trade.</p> <p>In certain instances SYM may execute over the counter securities transactions on an agency basis, which may result in advisory clients incurring two transaction costs for a single trade: a commission paid to the executing broker-dealer plus the market makers mark-up or mark-down.</p>	

**Schedule F of  
Form ADV**

**Continuation Sheet for Form ADV Part II**

Applicant:	SEC File Number:	Date:
<b>SYM Financial Corporation</b>	<b>801-23944</b>	<b>08/21/2009</b>

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: <b>SYM Financial Corporation</b>	IRS Empl. Ident. No.:
Item of Form (identify)	Answer
	<p>SYM does not endeavor to execute block trades and as a result sale and purchase prices will vary among clients causing performance results to vary.</p> <p>SYM utilizes Charles Schwab &amp; Co., Inc. ("Schwab"), Fidelity Investments ("Fidelity"), TD Waterhouse, and National Advisors Trust Company for all or substantially all of its client's brokerage transactions. In addition to brokerage services, Schwab, Fidelity and TD Waterhouse provide SYM's clients with valuable custodial, recordkeeping and research services. SYM, on a periodic and systematic basis, reviews its brokerage relationship with each of these entities to ensure that it is fulfilling its fiduciary duty to seek best execution on client transactions. Since SYM provides asset allocation services to advisory clients, the rebalancing of clients' investment portfolios occurs on a regular basis. As a result of such rebalancing, SYM clients may execute odd lot transactions, which could generate higher transaction costs.</p> <p>SYM participates in the TD Waterhouse Institutional Services program. TD Waterhouse Institutional Services is a division of TD Waterhouse Investor Services, Inc. ("TD Waterhouse") member NYSE/SIPC. TD Waterhouse is an independent and unaffiliated SEC-registered broker-dealer. TD Waterhouse offers to independently registered investment advisors services which include custody of securities, trade execution, and clearance and settlement of transactions. SYM receives some benefits from TD Waterhouse through its participation in the program.</p> <p>Upon inception of a client's participation in the Program, client selects the broker/custodian to provide trade execution and custodial services. The independent managers may effect transactions through the broker/custodian whom the client has selected (currently the client may choose Fidelity, Schwab, or National Advisors Trust Co.) or other broker-dealers. The fee paid to EnvestNet includes all brokerage commissions and costs related to the purchase and sale of securities in the Program.</p> <p>In evaluating participation in the Program, clients should recognize that brokerage commissions for the execution of transactions in the client's account are generally not negotiated by SYM. While broker-dealers utilized by EnvestNet's independent investment managers may generally offer best price and execution for securities transactions, no assurance can be given that such will be the case for each security transaction effected on behalf of the client through them.</p> <p>The client should consider whether, depending upon the level of the fee charged by EnvestNet, the amount of portfolio activity in the client's account, the value of the custodial and other services which are provided under the Program, the Program fee may or may not exceed the aggregate cost of such services if they were to be provided separately and if SYM was free to negotiate commissions and seek best price and execution of securities transactions for the client's accounts.</p> <p>SYM, has a minority ownership interest in a savings and loan holding company, National Advisors Holding, Inc. ("NAH") that has formed a federally chartered trust company, National Advisors Trust Company ("NATC"). Although not related persons, as that term is defined in the instructions to Form ADV, NAH and NATC are regulated by the Office of Thrift Supervision. The trust company provides a low cost alternative to traditional trust service providers, and SYM refers clients to NATC for trust and custodial services, where appropriate.</p>
Item 13 (A)	<p><b>ADDITIONAL COMPENSATION</b></p> <p>Although SYM does not generally enter into agreements with brokers regarding specific amounts of brokerage because of research provided, the commission rates generally paid by SYM's discretionary clients have appeared sufficient to allow executing brokers to provide SYM with a fairly full array of normal research services, information and products (i.e. receipt of duplicate trade confirmations and account statements, trading desk access, the ability to aggregate clients' securities transactions, the ability to directly debit advisory fees from clients' accounts, receipt of compliance publications, and access to mutual funds which generally require significantly higher minimum initial investments or are generally available only to institutional investors). SYM has determined that it would obtain Schwab, Fidelity and TD Waterhouse's research and other products and services regardless of the amount of commissions it generates throughout the year.</p>

**Schedule F of  
Form ADV****Continuation Sheet for Form ADV Part II**

Applicant:

**SYM Financial Corporation**

SEC File Number:

**801-23944**

Date:

**08/21/2009**

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1.	Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: <b>SYM Financial Corporation</b>	IRS Empl. Ident. No.:
Item of Form (identify)	Answer	
	<p>SYM may recommend TD Waterhouse to clients for custodial and brokerage services. SYM receives economic benefits from participation in the program which may include any one or more of the following: discounts on compliance, marketing, technology and practice management products or services provided to advisor by third party vendors. These benefits do not depend on the amount of brokerage transactions directed to TD Waterhouse. Clients should consider that there is a potential conflict of interest between their interests in obtaining best execution and SYM's receipt of and payment for research through brokerage allocations as described above.</p>	
Item 13(B)	<p>From time to time, SYM or a related person may enter into solicitation agreements with individuals or entities whereby investment advisory accounts are solicited for SYM. These agreements require that the solicitor perform his duties in accordance with the Investment Advisers Act and appropriate state regulations and that the solicitor provide each prospective client with SYM's written disclosure document (Part II of Form ADV) and the solicitor's separate written disclosure document. Clients obtained through solicitors will pay the same management fees as other SYM clients for services which are similar in scope and range of services.</p> <p>Certain of SYM's client referrals may come from Schwab, SYM will seek to obtain best execution on trades placed with brokers or dealers when clients instruct SYM to direct its trades. However, the cost and quality of such executions may be less favorable than those executed by SYM for its clients without brokerage direction. SYM will not seek better execution services or prices from other broker-dealers or be able to aggregate clients' transactions, for execution through other brokers or dealers, with orders for other accounts advised or managed by SYM. SYM may not obtain best execution on behalf of its clients, who may pay materially disparate commissions, greater spreads or other transaction costs, or receive less favorable net prices on transactions for their accounts than would otherwise be the case had they not instructed SYM to direct their brokerage. Clients should consider that there is a potential conflict of interest between their interests in obtaining best execution and SYM's receipt of future referrals from these brokers. SYM receives client referrals from Charles Schwab &amp; Co., Inc. ("Schwab") through SYM's participation in Schwab Advisor Network® ("the Service"). The Service is designed to help investors find an independent investment advisor. Schwab is a broker-dealer independent of and unaffiliated with SYM. Schwab does not supervise Advisor and has no responsibility for SYM's management of clients' portfolios or Advisor's other advice or services. SYM pays Schwab fees to receive client referrals through the Service. SYM's participation in the Service may raise potential conflicts of interest described below.</p> <p>SYM pays Schwab Participation Fees on all referred clients' accounts that are maintained in custody at Schwab and a Non-Schwab Custody Fee on all accounts that are maintained at, or transferred to, another custodian. Participation Fees are a percentage of the value of the assets in the client's account. SYM pays Schwab Participation Fees for so long as the referred client's account remains in custody at Schwab. Participation Fees are billed to SYM quarterly and may be increased, decreased or waived by Schwab from time to time. Participation Fees are paid by SYM and not by the client. SYM does not charge clients referred through the Service fees or costs greater than the fees or costs SYM charges clients with similar portfolios who were not referred through the Service.</p> <p>SYM generally pays Schwab a Non-Schwab Custody Fee if custody of a referred client's account is not maintained by, or assets in the account are transferred from Schwab. This Fee does not apply if the client was solely responsible for the decision not to maintain custody at Schwab. The Non-Schwab Custody Fee is a one-time payment equal to a percentage of the assets placed with a custodian other than Schwab. The Non-Schwab Custody Fee is higher than the Participation Fees SYM generally would pay in a single year. Thus, SYM will have an incentive to recommend that client accounts be held in custody at Schwab.</p> <p><i>The Participation and Non-Schwab Custody Fees are based on the amount of assets in accounts of SYM's clients who were referred by Schwab and those referred clients' family</i></p>	

**Schedule F of  
Form ADV**

**Continuation Sheet for Form ADV Part II**

Applicant:

**SYM Financial Corporation**

SEC File Number:

**801-23944**

Date:

**08/21/2009**

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

<p>1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: <b>SYM Financial Corporation</b></p>	<p>IRS Empl. Ident. No.:</p>
Item of Form (identify)	Answer
	<p><i>members living in the same household. Thus, SYM will have incentives to encourage household members of clients referred through the Service to maintain custody of their accounts Schwab.</i></p> <p>For accounts of SYM's clients maintained in custody at Schwab, Schwab generally does not charge the client separately for custody but receives compensation from the client in the form of commissions or other transaction-related compensation on securities trades Schwab executes for the client's account. Clients also pay Schwab a fee for clearance and settlement of trades executed through broker-dealers other than Schwab. Schwab's fees for trades executed at other broker-dealers are in addition to the other broker-dealer's fees. Thus, SYM may have an incentive to cause trades to be executed through Schwab rather than another broker-dealer. SYM nevertheless, acknowledges its duty to seek best execution of trades for client accounts. Trades for client accounts held in custody at Schwab may be executed through a different broker-dealer than trades for SYM's other clients. Thus, trades for accounts custodied at Schwab may be executed at different times and different prices than trades for other accounts that are executed at other broker-dealers.</p> <p>SYM may recommend that clients establish brokerage accounts with the Schwab Institutional division of Charles Schwab &amp; Co., Inc. (Schwab), a registered broker-dealer, Member SIPC/NYSE, to maintain custody of clients' assets and to effect trades for their accounts. Schwab Institutional provides SYM with access to its institutional trading and operations services, which are typically not available to Schwab retail investors. These services generally are available to independent investment advisors at no charge to them so long as a total of at least \$10 million of the advisor's clients' account assets are maintained at Schwab Institutional. Schwab Institutional's services include research, brokerage, custody, access to mutual funds and other investments that are otherwise available only to institutional investors or would require a significantly higher minimum initial investment. Schwab Institutional also makes available to SYM other products and services that benefit SYM but may not benefit its clients' accounts. Some of these other products and services assist SYM in managing and administering clients' accounts. These include software and other technology that provide access to client account data (such as trade confirmations and account statements), facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts), provide research, pricing information and other market data, facilitate payment of SYM's fees from its clients' accounts, and assist with back-office support, recordkeeping and client reporting. Many of these services generally may be used to service all or a substantial number of SYM's accounts, including accounts not maintained at Schwab Institutional. Schwab Institutional may also provide SYM with other services intended to help SYM manage and further develop its business enterprise. These services may include consulting, publications and presentations on practice management, information technology, business succession, regulatory compliance, and marketing. In addition, Schwab may make available, arrange and/or pay for these types of services to SYM by independent third parties. Schwab Institutional may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to SYM. <i>[The availability to SYM of the foregoing products and services is not contingent upon SYM committing to Schwab Institutional any specific amount of business (assets in custody or trading).]</i></p>