

Graham, Bordelon & Company, Inc.

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Disclosure Brochure

March 5, 2012

This brochure provides information about the qualifications and business practices of Graham, Bordelon & Company, Inc. If you have any questions about the contents of this brochure, please contact us at 202.965.2166. 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.

Graham, Bordelon & Company, Inc. is a registered investment adviser. Registration of an investment adviser does not imply any level of skill or training. The oral and written communications of an adviser provide you with information about which you determine to hire or retain an adviser.

Additional information about Graham, Bordelon & Company, Inc. also is available on the SEC's website at www.adviserinfo.sec.gov

Material Changes

Graham, Bordelon & Co.’s Disclosure Brochure has been updated with the following material change that has occurred since the last update of our Brochure on August 25, 2011.

The Advisory Business section of our brochure has been updated as to discretionary and non discretionary client assets under management.

As of December 31, 2011, we managed approximately \$89 million in client assets where we made all of the investment decisions. Approximately \$85 million in client assets were managed where our clients made the investment decisions based upon our recommendations.

Our current brochure may be requested by contacting Richard Bordelon, Vice President and Chief Compliance Officer at 318.322.7157. We will provide you with a brochure at any time without charge.

Additional information about us and about persons affiliated with us who are registered as our investment adviser representatives (“your advisory representative”) is also available via the SEC’s website, at www.adviserinfo.sec.gov. Information regarding your advisory representative can also be found in the supplement to this brochure on the page shown in the table of contents to the right of this column.

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Advisory Business

Graham Bordelon is a corporation organized under the laws of the State of Louisiana. Gary Graham and Richard Bordelon co- founded the Monroe-based investment advisory firm in 1986. Gary Graham and Jeffrey Golson are the majority owners. Graham Bordelon is an SEC registered investment advisory firm.

We offer investment supervisory management, financial planning, and consulting services.

Investment Management Services

We provide investment management services to you either by directly managing your account ourselves or through Triad Advisers, Inc. (“Triad”), an unaffiliated, registered broker-dealer and registered investment adviser. The Pinnacle, Summit and Crown account programs are sponsored by Triad and are designed to allow us the ability to manage mutual funds, stocks, bonds and insurance products (including variable annuity sub-accounts) under a variety of pricing structures as described below under “Fees and Compensation.”

Financial Planning and Other Consulting Services

We provide financial planning and business consulting services. In addition, we also furnish advice to you on matters relating to tax matters and employee benefits plans. We will also render advice to you on matters involving life

insurance and disability insurance. In addition, we will furnish advice on budgeting both business and personal. We will furnish consulting services relating to your business on an as-needed basis.

In managing your investment portfolio, we consider your

- financial situation,
- risk tolerance,
- investment horizon,
- liquidity needs,
- tax considerations,
- investment objectives, and
- any other issues important to your state of affairs.

You should notify us promptly if there are any changes in your financial situation or investment objectives or if you wish to impose any reasonable restrictions upon the management of your account.

Management of Wrap Accounts

The Pinnacle Account program is a wrap fee program. The fee you pay in this program covers our advisory fee and all brokerage commissions and other trading costs of transactions placed through Triad. We do not manage wrap fee accounts differently than we manage non-wrapped accounts. We receive a portion of the wrap fee for our services.

As of December 31, 2011, we managed approximately \$89 million in client assets where we made all of the investment

decisions. Approximately \$85 million in client assets were managed where our clients made the investment decisions based upon our recommendations.

Fees and Compensation

We provide investment supervisory services based upon either an hourly fee, flat fee, or as a percentage of assets under management. Under the hourly fee structure, you are billed at an hourly rate of \$50 - \$200 depending on the complexity of the project. Under the flat fee program, you will be quoted a fee in advance ranging from \$250 to \$25,000 annually depending upon numerous factors including, but not limited to, the complexity of your situation and the scope of the project.

In addition, we may perform investment supervisory services based upon a percentage of assets being supervised. Our fee is calculated based upon the market value of the assets in your account on the last day of the previous quarter. Our fees are charged quarterly, in arrears.

Broker-dealers and other financial institutions that hold client accounts are referred to as custodians (“custodian/broker-dealer”). Your custodian/broker-dealer determines the values of the assets in your portfolio.

Fees for the initial quarter are based on the value of your cash and securities on the date the custodian/broker-dealer receives them and are prorated based

upon the number of calendar days in the calendar quarter that our agreement is in effect. Our fee schedule is described below:

<u>Assets under Management</u>	<u>Advisory Fee¹</u>
Up to \$250,000	2.5%
\$250,001 to \$500,000	2.0%
\$500,001 to \$1,000,000	1.5%
Over \$1,000,000	1.0%

¹All fees are negotiable at our sole discretion.

Triad Programs

All transactions in the Pinnacle, Summit, and Crown programs are placed through Triad as introducing broker and cleared through National Financial Services LLC (“NFS”). Custody of funds and securities is maintained by NFS, not Triad or us.

The first advisory fee is due upon execution of our advisory agreement. Advisory fees will be taken first from cash or from any money market funds or balances. If this is insufficient to pay our fees, a portion of the account assets will be liquidated to cover the fees. Such liquidation may affect the relative balance of the account.

Triad fee programs use an average daily balance for fee calculations. Their fees are paid in advance.

Pinnacle Account Fees

Our fee schedule is described below:

<u>Assets under Management</u>	<u>Advisory Fee¹</u>
\$50,000 to \$250,000	2.75%
\$250,001 to \$500,000	2.50%
\$500,000 to \$2,000,000	2.25%
\$2,000,001 to \$5,000,000	2.00%
\$5,000,001 and up	1.75%

¹ All fees are negotiable at our sole discretion.

You will not be charged for transactions while participating in this program. However, there may be a minimum service fee. For more detail on this program and the associated fees, please read Triad's Pinnacle Account Wrap Brochure.

Summit Account Fees

Our fee schedule is described below:

<u>Assets under Management</u>	<u>Advisory Fee¹</u>
\$50,000 to \$250,000	2.75%
\$250,001 to \$500,000	2.25%
\$500,000 to \$1,000,000	1.75%
\$1,000,000 and up	1.50%

¹ All fees are negotiable at our sole discretion.

The current Summit transaction schedule is detailed in our investment advisory agreement. In addition, a minimum service fee may be charged.

Crown Account Fees

Our fee schedule is described below:

<u>Assets under Management</u>	<u>Advisory Fee¹</u>
\$0 to \$150,000	2.50%
\$150,001 to \$500,000	2.15%
\$500,001 +	1.75%

¹ All fees are negotiable at our sole discretion.

The current Crown transaction schedule is detailed in our investment advisory agreement. In addition, a minimum service fee may be charged.

You must authorize us to have the custodian/broker-dealer pay us directly by charging your account. This authorization must be provided in writing. One-fourth of the annual fee is charged each calendar quarter.

We send a statement that includes the value of your investments, our advisory fee, and how it is calculated. Your custodian/broker-dealer also provides you with statements that show the amount paid directly to us. You should compare the statement we send to your custodian/broker-dealer's statement and verify the calculation of our fees. Your custodian/broker-dealer does not verify the accuracy of fee calculations.

Financial Planning and Other Consulting Services

We provide financial planning and business consulting based upon the

hourly rate or a flat fee quoted in advance. You may be asked to deposit an initial retainer for future services to be rendered regardless if services are to be rendered on an hourly or flat fee basis. In no case will the retainer be held for more than six (6) months before services are rendered. If an hourly rate is charged, services performed beyond the initial retainer will be billed every 30 to 90 days. If a flat fee is quoted, services beyond the initial retainer amount will be billed at the completion of the engagement.

In addition to our fee, you may be required to pay other charges such as:

- custodial fees,
- brokerage commissions,
- transaction fees,
- internal fees and expenses charged by mutual funds or exchange traded funds (“ETFs”), and
- other fees and taxes on brokerage accounts and securities transactions.

Mutual fund companies, ETFs, and variable annuity issuers charge internal fees and expenses for their products. These fees and expenses are in addition to any advisory fees charged by us. Complete details of these internal fees and expenses are explained in the prospectuses for each investment. You are strongly encouraged to read these explanations before investing any money. You may ask us any questions you have about fees and expenses.

If you purchase mutual funds through the custodian/broker-dealer, you may

pay a transaction fee that would not be charged if the transactions were made directly through the mutual fund company. Also, mutual funds held in accounts at brokerage firms may pay internal fees that are different from funds held at the mutual fund company.

While you may purchase shares of mutual funds directly from the mutual fund company without a transaction fee, those investments would not be part of our advisory relationship with you. This means that they would not be included in our investment strategies, investment performance monitoring, or portfolio reallocations.

Please be sure to read the section entitled “Brokerage Practices,” which follows later in this brochure.

As noted above, you pay our fees for direct investment management quarterly in arrears. You may terminate the agreement without penalty within 30 business days after the execution of the agreement. Thereafter, you may terminate the agreement with us by giving us written notice. Upon receiving the notice, we will bill you only for those services rendered through the date the notice is received.

You must pay the advisory fees for the Triad programs in advance of receiving our services. The advisory agreement for the Triad programs may be terminated by either party at any time by written notice. Should you terminate the advisory agreement for these programs

within five (5) business days from the date the agreement is executed, you will receive a full refund of any fees paid.

Thereafter, should you terminate the advisory agreement for any of the Triad programs, you will be entitled to pro-rata refund of any prepaid quarterly fees based upon the number of days remaining in the quarter upon the date the notice of termination is received. The amount refunded to you is calculated by dividing the most recent advisory fee you paid by the total number of days in the quarter. This daily fee is then multiplied by the number of calendar days in the quarter that our agreement was in effect. This amount, which equals the amount we earned for the partial quarter, is subtracted from the total fee you paid in advance to determine your refund.

Retainers paid initially to us for financial planning and other consulting services are refundable to you upon your giving us thirty (30) days written notice of termination of the contract. The retainer will be refunded to you based upon our time spent through the termination date multiplied by the current hourly charge.

Our advisory representatives are also registered representatives and investment adviser representatives of Triad, a registered broker/dealer, member FINRA/SIPC, and registered investment adviser. If you choose to implement your financial plan through Triad, commissions may be earned by your financial advisor in addition to any fees paid for advisory services. In addition,

the financial advisor may be entitled to a portion of the internal expense fees (such as 12b-1 fees) charged by mutual funds.

Our advisory representatives are also licensed with various insurance companies. Commissions may be earned by our financial advisors if insurance products are purchased through these insurance companies.

We may receive benefits such as assistance with conferences and educational meetings from product sponsors.

Our advisory representatives may also recommend various asset management firms through their affiliation with Triad. If you establish an investment advisory relationship with one of these firms, our financial advisors may share in the advisory fees you pay to these asset management firms.

The above arrangements present a conflict of interest because they create an incentive to make recommendations based upon the amount of compensation we receive rather than based upon your needs. We will explain the specific costs associated with any recommended investments with you upon request. We also recommend no-load and load-waived mutual funds to further reduce conflicts of interest. Additionally, you have the option to purchase investment and insurance products through other brokers or agents who are not affiliated with us.

Performance-Based Fees

Performance-based fees are designed to give a portion of the returns of an investment to the investment adviser as a reward for positive performance. The fee is generally a percentage of the profits made on the investments. We do not charge performance-based fees on any of our client accounts.

Types of Clients

We provide advisory services primarily to high net worth individuals, including their trusts, estates and retirement accounts. We also provide services to corporations or business entities including their pension and profit sharing plans and to charitable organizations.

Account minimums vary by the program used to manage your assets. The Pinnacle Account may be suitable for accounts greater than \$150,000 and prefer not to pay individual transaction charges. The Summit Account may be suitable for accounts greater than \$50,000 that invest primarily in mutual funds. The Crown Account has no minimum account size.

We, at our sole discretion, may accept clients with smaller portfolios based upon certain factors including anticipated future earning capacity, anticipated future additional assets, account composition, related accounts, and pre-existing client relationships. We may consider the portfolios of your family members to

determine if your portfolio meets the minimum size requirement.

Methods of Analysis, Investment Strategies and Risk of Loss

We select specific investments for your portfolios through the use of fundamental analysis.

Fundamental analysis is a method of evaluating a company that has issued a security by attempting to measure the value of its underlying assets. It entails studying overall economic and industry conditions as well as the financial condition and the quality of the company's management. Earnings, expenses, assets, and liabilities are all important in determining the value of a company. The value is then compared to the current price of the issuing company's security to determine whether to purchase, sell or hold the security.

Cyclical analysis is a form of fundamental analysis that involves the process of making investment decisions based on the different stages of an industry at a given point in time.

Although we manage your portfolio in a manner consistent with your risk tolerances, there can be no guarantee that our efforts will be successful. You should be prepared to bear the risk of loss.

Our investment strategies may include long-term and short-term purchases and sales, and the use of margin. You may place reasonable restrictions on the

strategies to be employed in your portfolio and the types of investments to be held in your portfolio.

All investments involve risks that can result in loss:

- loss of principal,
- a reduction in earnings (including interest, dividends and other distributions), and
- the loss of future earnings.

Additionally, these risks may include:

- market risk,
- interest rate risk,
- issuer risk, and
- general economic risk.

Although we manage your portfolio in a manner consistent with your risk tolerances, we cannot guarantee that our efforts will be successful. You should be prepared to bear the risk of loss.

You must also be aware that the use of margin is a higher risk strategy. It is possible to lose all of the principal you invest, and sometimes more. In a cash account, your risk is limited to the amount of money that you have invested. In a margin account, your risk includes the amount of money invested plus the amount that has been loaned to you. We do not use or recommend the use of margin as part of our account management.

Disciplinary Information

We have not been the subject of any legal or disciplinary events that would be material to your evaluation of our business or the integrity of our management.

Other Financial Industry Activities and Affiliations

As explained under “Fees and Conditions” above, our advisory representatives are also licensed as registered representatives with Triad. They are also licensed as insurance agent with various insurance companies. These arrangements present a conflict of interest because they create an incentive to make recommendations based upon the amount of compensation your advisory representative can receive rather than based upon your needs.

As previously noted, we will explain the specific costs associated with any recommended investments with you upon request. We also recommend no-load and load-waived mutual funds to further reduce conflicts of interest. You have the option to purchase investment and insurance products through other brokers or agents who are not affiliated with us.

Our advisory representatives may also recommend various asset management firms through their affiliation with Triad. If you establish an investment advisory relationship with one of these firms, our financial advisors may share in the advisory fees you pay to these asset management firms.

Our principal executive officers and advisory representatives are also registered with EnTrust Investment Management, LLC (“EnTrust”), a registered investment advisory firm. They spend approximately 20% of their time on this activity. We own 80% of EnTrust, which shares space with us and is managed by the same principals. The services offered by EnTrust are similar to the services we offer.

Code of Ethics; Participation or Interest in Client Transactions and Personal Trading

We have adopted a Code of Ethics (“Code”) to address the securities-related conduct of our advisory representatives and employees. The Code includes our policies and procedures developed to protect your interests in relation to the following:

- the duty at all times to place your interests ahead of ours;
- that all personal securities transactions of our advisory representatives and employees be conducted in a manner consistent with the Code and avoid any actual or potential conflict of interest, or any abuse of an advisory representative’s or employee’s position of trust and responsibility;
- that advisory representatives may not take inappropriate advantage of their positions;
- that information concerning the

identity of your security holdings and financial circumstances are confidential; and

- that independence in the investment decision-making process is paramount.

We will provide a copy of the Code to you or any prospective client upon request.

We do not buy or sell securities for our firm that we also recommend to clients. Our advisory representatives and employees are permitted to buy or sell the same securities for their personal and family accounts that are bought or sold for your account(s). The personal securities transactions by advisory representatives and employees may raise potential conflicts of interest when they trade in a security that is:

- owned by you or
- considered for purchase or sale for you.

We have adopted policies and procedures that are intended to address these conflicts of interest. These policies and procedures:

- require our advisory representatives and employees to act in your best interest,
- prohibit favoring one client over another, and
- provide for the review of transactions to discover and correct any same-day trades that result in an advisory

representative or employee receiving a better price than a client.

Advisory representatives and employees must follow our procedures when purchasing or selling the same securities purchased or sold for you.

Brokerage Practices

We may recommend that the broker-dealer for your account be Triad as introducing broker and NFS as executing broker and custodian. Triad and NFS will assist us in servicing your accounts. We are independently owned and operated and our firm is not affiliated with Triad or NFS. Our use of these firms is, however, a beneficial business arrangement for us and for them. Information regarding the benefits of this relationship is described below.

In recommending NFS as the custodian and as the securities brokerage firm responsible for executing transactions for your portfolios, we consider at a minimum NFS's:

- existing relationship with us,
- financial strength,
- reputation,
- reporting capabilities,
- execution capabilities,
- pricing, and
- types and quality of research.

The determining factor in the selection of NFS to execute transactions for your accounts is not the lowest possible transaction cost, but whether NFS can

provide what is in our view the best qualitative execution for your account.

Triad and NFS provide us with access to their institutional trading and custody services, which include:

- brokerage,
- custody,
- research, and
- access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

We are not required to effect a minimum volume of transactions or maintain a minimum dollar amount of client assets to receive these services.

NFS does not charge separately for holding our clients' accounts, except for IRA accounts, but may be compensated by you through other transaction-related fees associated with the securities transactions it executes for your accounts.

Triad and NFS also make available to us other products and services that benefit us but may not benefit you directly. Some of these products and services assist us in managing and administering our client accounts, such as software and other technology that:

- provide access to account data such as:
 - duplicate trade confirmations,

- bundled duplicate account statements, and
- access to an electronic communication network for client order entry and account information;
- facilitate trade execution, including:
 - access to a trading desk serving advisory participants exclusively and
 - access to block trading which provides the ability to combine securities transactions and then allocate the appropriate number of shares to each individual account;
- provide research, pricing information and other market data;
- facilitate payment of our fees from client accounts; and
- assist with back-office functions, record keeping and client reporting; and
- receipt of compliance publications.

Triad and NFS also make available to us other services intended to help us manage and further develop our business. These services may include:

- consulting,
- publications and conferences on practice management,
- information technology,
- business succession,
- regulatory compliance, and
- marketing.

Triad and NFS may also make available or arrange for these types of services to be provided to us by independent third

parties. NFS may discount or waive the fees it would otherwise charge for some of the services it makes available to us. It may also pay all or a part of the fees of a third party providing these services to us. Thus, we receive economic benefits as a result of our relationship with NFS, because we do not have to produce or purchase the products and services listed above.

Because the amount of our compensation or the products or services we receive may vary depending on the custodian and broker-dealer we recommend to be used by our clients, we may have a conflict of interest in making that recommendation. Our recommendation of specific custodian and broker-dealer may be based in part on the economic benefit to us and not solely on the nature, cost or quality of custody and brokerage services provided to you and our other clients. We nonetheless strive to act in your best interests at all times.

Commissions and other fees for transactions executed through Triad and NFS may be higher than commissions and other fees available if you use another custodian/broker-dealer firm to execute transactions and maintain custody of your account. We believe, however, that the overall level of services and support provided to our clients by Triad and NFS outweighs the benefit of possibly lower transactions cost which may be available under other brokerage arrangements.

Many of the services described above may be used to benefit all or a substantial number of our accounts, including accounts not maintained at NFS. We do not attempt to allocate these benefits to specific clients.

You may direct us in writing to use a particular broker-dealer to execute some or all of the transactions for your account. If you do so, you are responsible for negotiating the terms and arrangements for the account with that broker-dealer. We may not be able to negotiate commissions, obtain volume discounts, or best execution. In addition, under these circumstances a difference in commission charges may exist between the commissions charged to clients who direct us to use a particular broker or dealer and other clients who do not direct us to use a particular broker or dealer.

We may engage in bunched trading, which is the purchase or sale of a security for the accounts of multiple clients in a single transaction. If a bunched trade is executed, each participating client receives a price that represents the average of the prices at which all of the transactions in a given bunch were executed. Accounts that participate in the same bunched trade will be charged commissions, if applicable, in accordance with their advisory contracts. Different accounts participating in a bunched transaction may not be charged the same commission rates. If the order is not completely filled, the securities purchased or sold are distributed among

participating clients on a pro rata basis or in some other equitable manner.

Bunched trades are placed only when we reasonably believe that the combination of the transactions provides better prices for clients than had individual transactions been placed for clients. Transactions for nondiscretionary client accounts are not bunched with transactions for discretionary client accounts. Transactions for the accounts of our employees and advisory representatives may be included in bunched trades. They receive the same average price and pay the same commissions and other transaction costs, as clients. Transactions for the accounts of our advisory representatives or employees will not be favored over transactions for client accounts.

We are not obligated to include any client account in a bunched trade. Bunched trades will not be effected for any client's account if doing so is prohibited or otherwise inconsistent with that client's investment advisory agreement. No client will be favored over any other client.

Review of Accounts

All client accounts are monitored on an ongoing basis with a formal review conducted at least annually or as agreed upon with individual clients. The reviews focus on the consistency of portfolio investments with each client's stated objectives and risk tolerances. Reviews also consider investment

restrictions requested by individual clients, investment time horizons, liquidity needs, tax considerations and other circumstances unique to each client.

On a quarterly basis, the performance of each client account is reviewed to monitor consistency with market benchmarks that we deem applicable. Account reviews may also be triggered by other factors such as changes in general economic and market conditions, analyst reports, issuer news and interest rate movement. Your advisory representative is responsible for all reviews.

You will receive statements from the custodian/broker-dealer at least quarterly. These statements identify your current investment holdings, the cost of each of those investments, and their current market values. You will also receive performance analysis reports prepared by us which describe the returns realized on the investments in your account.

Client Referrals and Other Compensation

We do not directly or indirectly compensate any person who is not one of our advisory representatives or employees for client referrals.

We receive certain economic benefits as a result of our participation in NFS's institutional program. Those benefits are

described in detail in the preceding section entitled "Brokerage Practices."

Custody

You will receive statements from the custodian/broker-dealer that holds your investment account on at least a quarterly basis. We urge you to carefully review these statements and compare them to the account statements that we may provide you. You should verify that the transactions in your account are consistent with your investment goals and the objectives for your account. We also encourage you to contact your advisory representative or our Chief Compliance Officer should you have any questions or concerns regarding your account.

Investment Discretion

We offer our advisory services on a discretionary basis. This means that we do not need advance approval from you to determine the type and amount of securities to be bought and sold for your accounts. We do not, however, have the ability to choose the broker-dealer through which transactions will be executed. Additionally, we do not have the ability to withdraw funds from your account (other than to withdraw our advisory fees which, may only be done with your prior written authorization.) This discretion is used in a manner consistent with the stated investment objectives for your account, if you have given us written authorization to do so. We only exercise discretion in accounts

where we have been authorized by you. This authorization is typically included in the investment advisory agreement you enter into with us.

Voting Client Securities

We do not take any action or give any advice with respect to voting of proxies solicited by or with respect to the issuers of securities in which your accounts may be invested. In addition, we do not take any action or give any advice with respect to any securities held in any accounts that are named in or subject to class action lawsuits. We will, however, forward to

you any information received by us regarding proxies and class action legal matters involving any securities held in your accounts.

Financial Information

We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to you and we have not been the subject of a bankruptcy proceeding.

Gary G. Graham
Graham, Bordelon & Company, Inc.

*2401 Tower Drive
Monroe, LA
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Brochure Supplement

March 15, 2011

This brochure supplement provides information about Gary G. Graham that supplements the Graham, Bordelon & Company, Inc. brochure. You should have received a copy of that brochure. Please contact Richard E. Bordelon, Vice President and Chief Compliance Officer if you did not receive Graham, Bordelon & Company, Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about Gary G. Graham is available on the SEC's website at www.adviserinfo.sec.gov.

Educational Background and Business Experience

Gary G. Graham

Year of birth: 1952

Formal education:

- Northeast Louisiana University – 1974, B.B.A.
- Loyola University Law School – 1977, J.D.

Business background:

- Graham, Bordelon & Company, Inc. – President, Advisory Representative; (1989 – Present)
- Triad Advisers, Inc. - Registered Representative; (1998 – Present)
- EnTrust Investment Management, LLC - Member, Advisory Representative; (1999 – Present)

Professional Designations:

Certified Public Accountant (CPA)

A CPA license is legally required in order to do particular jobs, such as public accounting (independent auditing). State laws govern what CPAs can and cannot do with their license. Mr. Graham currently maintains an inactive CPA license.

Disciplinary Information

Gary G. Graham has not been the subject of any legal or disciplinary event in the last ten years.

Other Business Activities

Mr. Graham is an owner and is also registered with EnTrust Investment Management, LLC, a registered investment advisory firm. He spends approximately 20% of his time on this activity.

Additional Compensation

Our advisory representatives are also registered representatives and investment adviser representatives of Triad Advisers, Inc. (“Triad”), a registered broker/dealer, member FINRA/SIPC, and registered investment adviser. If you choose to implement your financial plan through Triad, commissions may be earned by your financial advisor in addition to any fees paid for advisory services. In addition, the financial advisor may be entitled to a portion of the internal expense fees (such as 12b-1 fees) charged by mutual funds.

Our advisory representatives are also licensed with various insurance companies. Commissions may be earned by our financial advisors if insurance products are purchased through these insurance companies.

Our advisory representatives may also recommend various asset management

firms through their affiliation with Triad. If you establish an investment advisory relationship with one of these firms, our financial advisors may share in the advisory fees you pay to these asset management firms.

The above arrangements present a conflict of interest because they create an incentive to make recommendations based upon the amount of compensation we receive rather than based upon your needs. We will explain the specific costs associated with any recommended investments with you upon request. We also recommend no-load and load-waived mutual funds to further reduce conflicts of interest. Additionally, you have the option to purchase investment and insurance products through other brokers or agents who are not affiliated with us.

Supervision

Mr. Graham is supervised by Richard Bordelon, Chief Compliance Officer. Mr. Bordelon can be reached at 318.322.7157.

We supervise Mr. Graham by requiring that he adhere to our processes and procedures as described in our firm's Code of Ethics. We will monitor the advice that Mr. Graham gives to you by performing the following reviews:

- A review of relevant account opening documentation when the relationship is established
- A daily review of account transactions,
- Review custodial information on a quarterly basis to assess account activity,
- Perform annual oversight so that Mr. Graham is aware of your current financial situation, objectives, and individual investment needs
- A review of client correspondence on an as needed basis.

Richard E. Bordelon
Graham, Bordelon & Company, Inc.

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Brochure Supplement

August 25, 2011

This brochure supplement provides information about Richard E. Bordelon that supplements the Graham, Bordelon & Company, Inc. brochure. You should have received a copy of that brochure. Please contact Richard E. Bordelon, Vice President and Chief Compliance Officer if you did not receive Graham, Bordelon & Company, Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about Richard E. Bordelon is available on the SEC's website at www.adviserinfo.sec.gov.

Educational Background and Business Experience

Richard E. Bordelon

Year of birth: 1952

Formal education:

- Northeast Louisiana University – 1974, B.B.A.

Business background:

- Graham, Bordelon & Company, Inc. – Chief Compliance Officer, Advisory Representative; (1989 – Present)
- Triad Advisers, Inc. - Registered Representative; (1998 – Present)
- EnTrust Investment Management, LLC – Member, Advisory Representative; (1999 – Present)

Professional Designations:

Certified Public Accountant (CPA)

A CPA license is legally required in order to do particular jobs, such as public accounting (independent auditing). State laws govern what CPAs can and cannot do with their license. Mr. Bordelon currently maintains an inactive CPA license.

Disciplinary Information

Richard E. Bordelon has not been the subject of any legal or disciplinary event in the last ten years.

Other Business Activities

Mr. Bordelon is also registered with and the CCO of EnTrust Investment Management, LLC, a registered investment advisory firm. He spends approximately 20% of his time on this activity.

Additional Compensation

Our advisory representatives are also registered representatives and investment adviser representatives of Triad Advisers, Inc. (“Triad”), a registered broker/dealer, member FINRA/SIPC, and registered investment adviser. If you choose to implement your financial plan through Triad, commissions may be earned by your financial advisor in addition to any fees paid for advisory services. In addition, the financial advisor may be entitled to a portion of the internal expense fees (such as 12b-1 fees) charged by mutual funds.

Our advisory representatives are also licensed with various insurance companies. Commissions may be earned by our financial advisors if insurance products are purchased through these insurance companies.

Our advisory representatives may also recommend various asset management

firms through their affiliation with Triad. If you establish an investment advisory relationship with one of these firms, our financial advisors may share in the advisory fees you pay to these asset management firms.

The above arrangements present a conflict of interest because they create an incentive to make recommendations based upon the amount of compensation we receive rather than based upon your needs. We will explain the specific costs associated with any recommended investments with you upon request. We also recommend no-load and load-waived mutual funds to further reduce conflicts of interest. Additionally, you have the option to purchase investment and insurance products through other brokers or agents who are not affiliated with us.

Supervision

Mr. Bordelon is supervised by Gary Graham, President. Mr. Graham can be reached at 318.322.7157.

We supervise Mr. Bordelon by requiring that he adhere to our processes and procedures as described in our firm's Code of Ethics. We will monitor the advice that Mr. Bordelon gives to you by performing the following reviews:

- A daily review of account transactions,
 - Review custodial information on a quarterly basis to assess account activity,
 - Perform annual oversight so that Mr. Bordelon is aware of your current financial situation, objectives, and individual investment needs
 - A review of client correspondence on an as needed basis.
-
- A review of relevant account opening documentation when the relationship is established

Jeff K. Golson
Graham, Bordelon & Company, Inc.

*2401 Tower Drive
Monroe, LA
71201
318.322.7157*

Brochure Supplement

March 15, 2011

This brochure supplement provides information about Jeff K. Golson that supplements the Graham, Bordelon & Company, Inc. brochure. You should have received a copy of that brochure. Please contact Richard E. Bordelon, Vice President and Chief Compliance Officer if you did not receive Graham, Bordelon & Company, Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about Jeff K. Golson is available on the SEC's website at www.adviserinfo.sec.gov.

Educational Background and Business Experience

Jeff K. Golson

Year of birth: 1963

Formal education:

- Northeast Louisiana University – 1986, B.B.A.

Business background:

- Graham, Bordelon & Company, Inc. – Vice President, Advisory Representative; (1989 – Present)
- Triad Advisers, Inc. - Registered Representative; (1998 – Present)
- EnTrust Investment Management, LLC – Member, Advisory Representative; (1999 – Present)

Professional Designations:

Certified Public Accountant (CPA)

A CPA license is legally required in order to do particular jobs, such as public accounting (independent auditing). State laws govern what CPAs can and cannot do with their license. Mr. Golson currently maintains an inactive CPA license.

Disciplinary Information

Jeff K. Golson has not been the subject of any legal or disciplinary event in the last ten years.

Other Business Activities

Mr. Golson is an owner and is also registered with EnTrust Investment Management, LLC, a registered investment advisory firm. He spends approximately 20% of his time on this activity.

Additional Compensation

Our advisory representatives are also registered representatives and investment adviser representatives of Triad Advisers, Inc. (“Triad”), a registered broker/dealer, member FINRA/SIPC, and registered investment adviser. If you choose to implement your financial plan through Triad, commissions may be earned by your financial advisor in addition to any fees paid for advisory services. In addition, the financial advisor may be entitled to a portion of the internal expense fees (such as 12b-1 fees) charged by mutual funds.

Our advisory representatives are also licensed with various insurance companies. Commissions may be earned by our financial advisors if insurance products are purchased through these insurance companies.

Our advisory representatives may also recommend various asset management firms through their affiliation with Triad. If you establish an investment advisory relationship with one of these firms, our financial advisors may share in the advisory fees you pay to these asset management firms.

The above arrangements present a conflict of interest because they create an incentive to make recommendations based upon the amount of compensation we receive rather than based upon your needs. We will explain the specific costs associated with any recommended investments with you upon request. We also recommend no-load and load-waived mutual funds to further reduce conflicts of interest. Additionally, you have the option to purchase investment and insurance products through other brokers or agents who are not affiliated with us.

- Perform annual oversight so that Mr. Golson is aware of your current financial situation, objectives, and individual investment needs, and
- A review of client correspondence on an as needed basis.

Supervision

Mr. Golson is supervised by Richard Bordelon, Chief Compliance Officer. Mr. Bordelon can be reached at 318.322.7157.

We supervise Mr. Golson by requiring that he adhere to our processes and procedures as described in our firm's Code of Ethics. We will monitor the advice that Mr. Golson gives to you by performing the following reviews:

- A review of relevant account opening documentation when the relationship is established
- A daily review of account transactions,
- Review custodial information on a quarterly basis to assess account activity,

Micheal Gilbert, CPA
Graham, Bordelon & Company, Inc.

*2401 Tower Drive
Monroe, LA
71201
318.322.7157*

Brochure Supplement

August 25, 2011

This brochure supplement provides information about Micheal Gilbert that supplements the Graham, Bordelon & Company, Inc. brochure. You should have received a copy of that brochure. Please contact Richard E. Bordelon, Vice President and Chief Compliance Officer if you did not receive Graham, Bordelon & Company, Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about Micheal Gilbert is available on the SEC's website at www.adviserinfo.sec.gov.

Educational Background and Business Experience

Micheal Gilbert

Year of birth: 1975

Formal education:

- Northeast Louisiana University – 1998, B.B.A.

Business background:

- Graham, Bordelon & Company, Inc. – Vice President, Advisory Representative; (1999 – Present)
- Triad Advisers, Inc. - Registered Representative; (2006 – Present)
- EnTrust Investment Management, LLC – Advisory Representative; (1999 – Present)

Professional Designations:

Certified Public Accountant (CPA)

A CPA license is legally required in order to do particular jobs, such as public accounting (independent auditing). State laws govern what CPAs can and cannot do with their license.

Disciplinary Information

Micheal Gilbert has not been the subject of any legal or disciplinary event.

Other Business Activities

Mr. Gilbert is an owner and is also registered with EnTrust Investment Management, LLC, a registered investment advisory firm. He spends approximately 20% of his time on this activity.

Additional Compensation

Our advisory representatives are also registered representatives and investment adviser representatives of Triad Advisers, Inc. (“Triad”), a registered broker/dealer, member FINRA/SIPC, and registered investment adviser. If you choose to implement your financial plan through Triad, commissions may be earned by your financial advisor in addition to any fees paid for advisory services. In addition, the financial advisor may be entitled to a portion of the internal expense fees (such as 12b-1 fees) charged by mutual funds.

Our advisory representatives are also licensed with various insurance companies. Commissions may be earned by our financial advisors if insurance products are purchased through these insurance companies.

Our advisory representatives may also recommend various asset management firms through their affiliation with Triad. If you establish an investment advisory relationship with one of these firms, our financial advisors may share in the advisory fees you pay to these asset management firms.

The above arrangements present a conflict of interest because they create an incentive to make recommendations based upon the amount of compensation we receive rather than based upon your needs. We will explain the specific costs associated with any recommended investments with you upon request. We also recommend no-load and load-waived mutual funds to further reduce conflicts of interest. Additionally, you have the option to purchase investment and insurance products through other brokers or agents who are not affiliated with us.

- Perform annual oversight so that Mr. Gilbert is aware of your current financial situation, objectives, and individual investment needs, and
- A review of client correspondence on an as needed basis.

Supervision

Mr. Gilbert is supervised by Richard Bordelon, Chief Compliance Officer. Mr. Bordelon can be reached at 318.322.7157.

We supervise Mr. Gilbert by requiring that he adhere to our processes and procedures as described in our firm's Code of Ethics. We will monitor the advice that Mr. Gilbert gives to you by performing the following reviews:

- A review of relevant account opening documentation when the relationship is established
- A daily review of account transactions,
- Review custodial information on a quarterly basis to assess account activity,

William B. Hanks
Graham, Bordelon & Company, Inc.

*2401 Tower Drive
Monroe, LA
71201
318.322.7157*

Brochure Supplement

March 24, 2011

This brochure supplement provides information about William B. Hanks that supplements the Graham, Bordelon & Company, Inc. brochure. You should have received a copy of that brochure. Please contact Richard E. Bordelon, Vice President and Chief Compliance Officer if you did not receive Graham, Bordelon & Company, Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about William B. Hanks is available on the SEC's website at www.adviserinfo.sec.gov.

Educational Background and Business Experience

William B. Hanks

Year of birth: 1955

Formal education:

- University of Louisiana – 1976, B.B.A., Accounting
- University of Louisiana – 1977, M.B.A.
- CPA - 1978

Business background:

- Graham, Bordelon & Company, Inc. – Consultant (01/06 – Present); Advisory representative (04/07 – Present)
- American Horizons Bank and predecessor Horizons Bank – Board of Directors; (1999 – 03/05)
- IberiaBank – Advisory Board; (04/05 – Present)
- CenturyLink, Inc.(formerly CenturyTel, Inc. and Century Telephone Enterprises, Inc.) – Board of Directors (08/92 – Present)
- University of Louisiana – Director of Athletics (03/01 – 06/04)
- CenturyLink, Inc. – Various executive positions (08/80 – 03/01)
- Peat, Marwick, Mitchell & Co. – CPA (01/78 – 08/80)

Professional Designations:

Certified Public Accountant (CPA)

A CPA license is legally required in order to do particular jobs, such as public accounting (independent auditing). State laws govern what CPAs can and cannot do with their license. Mr. Hanks currently maintains an inactive CPA license.

Disciplinary Information

William B. Hanks has not been the subject of any legal or disciplinary event.

Other Business Activities

Mr. Hanks serves on the Board of Directors of CenturyLink, Inc., and serves on the Advisory Board of IberiaBank. He spends approximately 20% of his time on this activity.

Additional Compensation

Mr. Hanks does not receive any additional compensation related to the advisory services provided to you.

Supervision

Mr. Hanks is supervised by Richard Bordelon, Chief Compliance Officer. Mr. Bordelon can be reached at 318.322.7157.

We supervise Mr. Hanks by requiring that he adhere to our processes and procedures as described in our firm's Code of Ethics. We will monitor the

advice that Mr. Hanks gives to you by performing the following reviews:

- A review of relevant account opening documentation when the relationship is established
- A daily review of account transactions,
- Review custodial information on a quarterly basis to assess account activity,
- Perform annual oversight so that Mr. Hanks is aware of your current financial situation, objectives, and individual investment needs, and
- A review of client correspondence on an as needed basis.

James Clint Rider
Graham, Bordelon & Company, Inc.

*2401 Tower Drive
Monroe, LA
71201
318.322.7157*

Brochure Supplement

March 24, 2011

This brochure supplement provides information about James Clint Rider that supplements the Graham, Bordelon & Company, Inc. brochure. You should have received a copy of that brochure. Please contact Richard E. Bordelon, Vice President and Chief Compliance Officer if you did not receive Graham, Bordelon & Company, Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about James Clint Rider is available on the SEC's website at www.adviserinfo.sec.gov.

Educational Background and Business Experience

James Clint Rider

Year of birth: 1974

Formal education:

- University of Louisiana – 2000, B.S., Agricultural Business

Business background:

- Graham, Bordelon & Company, Inc. – Advisory representative (03/11 – Present)
- Triad Advisors, Inc. – Registered Representative (03/11 – Present)
- Morgan Keegan & Company - Advisory Representative, Registered Representative, Associate Vice President (03/05 – 03/11)

Disciplinary Information

James Clint Rider reached a compromise settlement with several creditors due to an extended period of unemployment.

Other Business Activities

Mr. Rider is not engaged in any business activities other than those related to Graham, Bordelon & Company, Inc.

Additional Compensation

Our advisory representatives are also registered representatives and investment adviser representatives of Triad Advisers, Inc. (“Triad”), a registered broker/dealer, member FINRA/SIPC, and registered investment adviser. If you choose to implement your financial plan through Triad, commissions may be earned by your financial advisor in addition to any fees paid for advisory services. In addition, the financial advisor may be entitled to a portion of the internal expense fees (such as 12b-1 fees) charged by mutual funds.

Our advisory representatives are also licensed with various insurance companies. Commissions may be earned by our financial advisors if insurance products are purchased through these insurance companies.

Our advisory representatives may also recommend various asset management firms through their affiliation with Triad. If you establish an investment advisory relationship with one of these firms, our financial advisors may share in the advisory fees you pay to these asset management firms.

The above arrangements present a conflict of interest because they create an incentive to make recommendations based upon the amount of compensation we receive rather than based upon your needs. We will explain the specific costs associated with any recommended investments with you upon request. We

also recommend no-load and load-waived mutual funds to further reduce conflicts of interest. Additionally, you have the option to purchase investment and insurance products through other brokers or agents who are not affiliated with us.

Supervision

Mr. Rider is supervised by Richard Bordelon, Chief Compliance Officer. Mr. Bordelon can be reached at 318.322.7157.

We supervise Mr. Rider by requiring that he adhere to our processes and procedures as described in our firm's Code of Ethics. We will monitor the advice that Mr. Rider gives to you by performing the following reviews:

- A review of relevant account opening documentation when the relationship is established
- A daily review of account transactions,
- Review custodial information on a quarterly basis to assess account activity,
- Perform annual oversight so that Mr. Rider is aware of your current financial situation, objectives, and individual investment needs, and
- A review of client correspondence on an as needed basis.