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01/31/2012

This Brochure provides information about the qualifications and business practices of Bradford & Marzec LLC. If you have any questions about the contents of this Brochure, please contact us at (213) 687 - 9170. 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.

Bradford & Marzec LLC 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 Bradford & Marzec LLC also is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 – Material Changes

Item 4:

AUM has increased from \$4,094,252,500 on 1/31/2011 to \$4,384,204,052 on 1/31/2012

Item 5:

Language has been added to reflect a minimum annual fee of \$5000 for institutional accounts, regardless of size. Fee schedules for Cash-Enhanced and Intermediate strategies have been removed. In addition, Core and Core Plus fee schedules have changed as follows:

Core:

<u>Assets</u>	<u>Prior Fee</u>	<u>Current Fee</u>
\$0 - \$10 Million	0.35%	0.35%
\$10 - \$50 Million	0.235%	0.285%
\$50 - \$100 Million	0.20%	0.20%
Over \$100 Million	Negotiable	Negotiable
Minimum fee of \$5,000		

Core-Plus:

<u>Assets</u>	<u>Prior Fee</u>	<u>Current Fee</u>
\$0 - \$10 Million	0.39%	0.39%
\$10 - \$50 Million	0.285%	0.32%
\$50 - \$100 Million	0.25%	0.285%
Over \$100 Million	Negotiable	Negotiable
Minimum fee of \$5,000		

Item 8:

References to fixed stop loss processes have been removed from Interest Rate and Yield Curve Risks and Currency Risk segments. Management retains discretion to sell or hold assets triggering a stop loss review, forced selling is not a part of the process.

Item 10:

The statement of industry affiliation was revised to clarify the standing of BM LLC as an NFA member operating under exemption from registration as a CTA/CPO.

In the past we have offered or delivered information about our qualifications and business practices to clients on at least an annual basis. We will ensure that you receive a summary of any materials changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year. We may further provide other ongoing disclosure information about material changes as necessary.

We will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

Currently, our Brochure may be requested by contacting Jason Rall, Chief Compliance Officer at (213) 687 - 9170 or jrall@bradfordmarzec.com.

Additional information about Bradford & Marzec LLC is also available via the SEC's web site www.adviserinfo.sec.gov. The SEC's web site also provides information about any persons affiliated with Bradford & Marzec LLC who are registered, or are required to be registered, as investment adviser representatives of Bradford & Marzec LLC.

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Item 4 – Advisory Business

Our Firm

Founded in 1984, Bradford & Marzec LLC (BMLLC) is wholly owned by Bradford & Marzec, Inc. and specializes in the management of traditional long only domestic and international Fixed Income portfolios for the benefit of Investment Companies, Institutional and High Net Worth investors, Trusts, Charitable Corporations, and Pension Plans. The Firm's sole focus is Fixed Income. Our two Managing Partners, Edward Bradford and Zelda Marzec, are indirect owners of Bradford & Marzec LLC through their holdings in Bradford & Marzec, Inc.

Description of Services Provided:

BMLLC manages fixed income portfolios for Investment Companies, Institutional and High Net Worth investors, Trusts, Charitable Corporations, and Pension Plans on a discretionary basis. Some of these portfolios consist of all domestic bonds while others allow both domestic and international bonds. BMLLC invests directly in the cash bond markets with limited use of derivatives utilizing a traditional, long-only investment approach. BMLLC may also advise institutional clients under certain circumstances that would involve suggesting the appropriate maturity structure, sectors, coupon range, quality and issuers for a bond portfolio. Services provided by BMLLC would not include factors such as becoming familiar with personal and family obligations; financial planning and tax services are not offered. Methods utilized to develop portfolio strategy include fundamental, technical, and cyclical/cycle-trend analysis using information from a variety of sources including corporate ratings agencies, internal and external research, press releases, annual reports, prospectuses, SEC filings, and commercial publications. Our portfolio strategies use a combination of long term (positions held longer than 12 months) and short term (positions held less than 12 months) investing as well as active trading (positions held less than 30 days) while strategic planning uses a 6-12 month view of economic and market cycles.

Availability of Custom Strategies:

The strategy employed in a particular client portfolio may be adjusted to suit the client's needs; portfolio guidelines, restrictions, and benchmarks may be tailored to fit client specified requirements. Customized portfolio reporting is also available.

Participation in Wrap Account Programs:

BMLLC currently serves as Investment Adviser on multiple Wrap Account platforms. Unlike our Institutional portfolios, Wrap Accounts portfolios are managed to a Model Portfolio which consists of a subset of issuers in which our Institutional portfolios also invest. Wrap Accounts may differ from the Model Portfolio in terms of the amount of each issuer held. Both Institutional and Wrap portfolios follow similar strategies and utilize the same investment process and research.

BM LLC has managed account agreements with some brokerage firms where brokerage clients have wrap fee arrangements. The brokerage client pays a single asset-based fee that typically includes, but may not be limited to, consulting services, brokerage commissions on transactions executed by the brokerage firm, portfolio monitoring and reporting, custodial services, and investment management fees. Bradford and Marzec acts as a manager in these managed account programs and receives a portion of the management fee.

Assets Under Management:

As of 1/31/2012, discretionary assets under management total \$4,384,204,052. BM LLC does not currently manage non-discretionary portfolios.

Item 5 – Fees and Compensation

Billing Procedures and Client Contract Termination:

All fees are subject to negotiation.

Billing procedures for SMA and Wrap Account programs are dictated by separate contracts entered into with individual sponsors and will vary dependent upon the entities involved. Billing procedures and contract termination specifics are dictated and managed by the sponsors.

The specific manner in which fees are charged by BM LLC is established in a client's written agreement with BM LLC. BM LLC will generally bill clients directly on a quarterly basis in arrears. Management fees shall be prorated for each capital contribution and withdrawal made during the applicable calendar quarter (with the exception of de minimis contributions and withdrawals). Accounts initiated or terminated during a calendar quarter will be charged a prorated fee. Upon termination of any account, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable. The client has the right to terminate an agreement without penalty within five business days after entering into the agreement.

BM LLC's fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the client. Clients may incur certain charges imposed by third parties such as investment management fees, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to BM LLC's fee, and BM LLC shall not receive any portion of these commissions, fees, and costs, with the exception being commissions paid to brokers with which BM LLC has a commission recapture program. Under the terms of a commission recapture program a broker receiving commissions on a transaction will make available for use by BM LLC a portion of the commissions paid to purchase research and execution services to assist BM LLC in the management of client portfolios. Item 12 further describes the factors that BM LLC considers in selecting or

recommending broker-dealers for *client* transactions and determining the reasonableness of their compensation (*e.g.*, commissions). BMLLC Supervised Persons do not receive compensation related to the sale of securities or investment products.

Basic Fee Schedule:

Fees may differ for many reasons, including account size, specific investment management requirements, and discretionary or non-discretionary status. Standard fee schedules are:

Fee Schedule – Institutional Accounts

Core:

<u>Assets</u>	<u>Fee</u>
\$0 - \$10 Million	0.35%
\$10 - \$50 Million	0.285%
\$50 - \$100 Million	0.20%
Over \$100 Million	Negotiable
Minimum fee of \$5,000	

Core-Plus:

<u>Assets</u>	<u>Fee</u>
\$0 - \$10 Million	0.39%
\$10 - \$50 Million	0.32%
\$50 - \$100 Million	0.285%
Over \$100 Million	Negotiable
Minimum fee of \$5,000	

High Yield:

<u>Assets</u>	<u>Fee</u>
\$0 - \$10 Million	0.50%
\$10 - \$25 Million	0.45%
\$25 - \$100 Million	0.375%
Over \$100 Million	Negotiable
Minimum fee of \$5,000	

Global and International:

Portfolios with a global mandate or international only may be negotiated at a higher fee rate than domestic only portfolios. The maximum percentage of non-dollar foreign bonds in a global portfolio, the number of foreign countries, hedging requirements, custodian arrangements and the total size of the portfolio will be the main determinants in setting the fee schedule.

Fee Schedule – SMA/Retail Accounts

Core SMA/Retail:

<u>Assets</u>	<u>Fee</u>
\$300,000 - \$5 Million	0.40%
Over \$5 Million	0.30%
Minimum fee of \$2,000, minimum account size of \$300,000	

Core Plus SMA/Retail:

<u>Assets</u>	<u>Fee</u>
\$300,000 - \$5 Million	0.40%
Over \$5 Million	0.30%
Minimum fee of \$2,000, minimum account size of \$300,000	

High Yield SMA/Retail:

<u>Assets</u>	<u>Fee</u>
\$500,000 - \$5 Million	0.55%
Over \$5 Million	0.50%
Minimum fee of \$3,000, minimum account size of \$500,000	

Item 6 – Performance-Based Fees and Side-By-Side Management

In some cases, BMLLC has entered into performance fee arrangements with qualified clients: performance fees are subject to negotiation with each such client. BMLLC will structure any performance or incentive fee arrangement subject to Section 205(a)(1) of the Investment Advisors Act of 1940 (The Advisors Act) in accordance with the available exemptions there under, including the exemption set forth in Rule 205-3. In measuring clients' assets for the calculation of performance-based fees, BMLLC shall include realized and unrealized capital gains and losses. Performance based fee arrangements may create an incentive for BMLLC to recommend investments which may be riskier or more speculative than those which would be recommended under a different fee arrangement. Such fee arrangements also create an incentive to favor higher fee paying accounts over other accounts in the allocation of investment opportunities. BMLLC has procedures designed and implemented to verify that clients are treated fairly and equitably, and to prevent this conflict from influencing the allocation of investment opportunities among clients.

Item 7 – Types of Clients

BMLLC offers portfolio management services to individuals, high net worth individuals, corporate pension and profit-sharing plans, Taft-Hartley plans, charitable institutions, foundations, endowments, municipalities, registered mutual funds, private investment funds, trust programs, sovereign funds, and other U.S. and international institutions.

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

Our general investment strategy is constructed to capitalize on an ever-changing economic cycle that influences appreciation and depreciation in different bond sectors over the cycle. Sector allocation, security selection and yield curve strategies are employed in the process and are intended to add value.

The primary strategy involves overweighting and underweighting sectors consistent with a particular economic business cycle phase. The decision to avoid sectors that may be overvalued or may have poor credit fundamentals is as important as selection and rotation of sectors that may have favorable credit and valuation trends. The firm's opportunistic approach emphasizes the utilization of traditional fixed-income instruments within the various sectors of the bond market.

The security selection process integrates sector strategy with bottom up index structure analysis to categorized and identify opportunities. Within industries the largest issuers are identified to focus efficiently on the relevant opportunity set. These issuers tend to drive sector performance, influence both fundamental and technical trends, and typically have greater secondary market liquidity. Benchmark index analysis results in a streamlined, more manageable framework to identify opportunities, gauge risks, and measure relative performance.

The Senior Portfolio Strategy Group develops and implements a duration strategy based on our intermediate term cyclical view of the movements of US interest rates. Our stated Duration range for this decision could be up to +/- 25% of the benchmark.

Portfolio trading strategies include long term purchases, short term purchases, and active trading. Frequent trading can negatively impact investment performance due to the potential of increased tax liability and transaction costs. Investing in securities involves the risk of loss that clients should be prepared to bear.

Methods of analysis employed during strategy implementation and portfolio monitoring include statistical, fundamental, technical, and cyclical analysis. Industry analysts review operating and credit trends within assigned industries and perform financial analysis on individual issuers to develop recommendations for each of their respective industries.

Quantitative tools are used to monitor and manage the risks in the investment strategy. We employ the Yield Book fixed income system to assist in managing and quantifying the portfolio risks. These risks include:

Interest Rate and Yield Curve Risks

Changes in the level of interest rates and shape of the yield curve can impact the market value of the portfolio. Quantitative analysis generated from the Yield Book system is used to monitor and manage these risks and a +/-25% portfolio duration band relative to the applicable benchmark is set to control

interest rate risks. Curve shifts are applied to the overall portfolio to measure the sensitivity to changes in interest rates and the shape of the yield curve.

Credit and Default Risk

The timely payment of interest and principal for a fixed income security typically relies on the guarantee of the underlying issuer. Our credit research team assesses credit/default risk through detailed industry and credit analysis, including following the quarterly conference calls for companies that we invest in and generating a periodic industry review on all assigned sectors. The Credit/Default risk is also mitigated by maintaining a well diversified portfolio to reduce concentration to any single issuer and through detailed monitoring of equity prices for the credits we hold in the portfolio.

Currency Risk

Currency risk is controlled by hedging out exposure using forward currency contracts. The total exposure is constantly monitored as a percentage of the portfolio and carefully controlled depending on client guidelines. On a daily basis the effect of currency fluctuations on the performance of the portfolio is estimated on a real-time basis. Foreign exchange markets in non-U.S. time zones are also monitored and contact is maintained with FX dealer operations overseas in those time zones. Performance variances due to the effects of currencies are closely monitored.

Liquidity Risk

The investment process at Bradford & Marzec LLC has always emphasized the importance of investing in liquid securities. The liquidity of the portfolio is managed carefully to provide the flexibility to rotate into sectors or securities that represent opportunities and to rotate out or reduce risk in sector or securities that are vulnerable to the current environment. Liquidity risk is also controlled by setting limits on the minimum issue size and reviewing who makes markets for a particular security.

Counterparty Risk

Counterparty risk is defined as the risk to each party of a contract that the counterparty to the contract will not fulfill its contractual obligations. Counterparty risk for our clients is limited by our minimal use of derivative securities. The majority of transactions performed in client accounts are executed on a delivery versus payment basis. Prior to any transaction with a particular counter party, the counter party must be approved through our broker approval process. Approved brokers are reviewed at least annually.

Item 9 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of BMLLC or the integrity of the management at BMLLC. BMLLC has no information applicable to this Item.

Item 10 – Other Financial Industry Activities and Affiliations

BMLLC is currently a member of the National Futures Association operating under an exemption from registration as a Commodities Trading Adviser. BMLLC is an independent employee owned Registered Investment Advisor focused on professional asset management for a variety of individuals and organizations.

Item 11 – Code of Ethics

From time to time, Bradford & Marzec, LLC and/or a related person may buy or sell for itself securities that it also recommends to clients.

Policy Regarding Personal Securities Transactions by Employees:

All employees of BMLLC are required to sign and abide by BMLLC's Code of Ethics. In summation, this document prohibits any misuse of nonpublic information, any personal trading activity that is improper in relation to client trades, and various other activities that may create a conflict of interest. To track employee compliance with the code, access persons and most members of the support staff are required to submit on a quarterly basis all reportable transactions executed in their personal accounts. Employees are also required to receive permission to invest in certain fixed income instruments, such as corporate bonds, before the transaction is initiated to verify beneficial investment opportunities are allocated to our clients first. Pre-clearance is also required for participation in IPO and Private Placements to assist in identifying potential conflicts of interest. Employee personal transactions are reviewed against client transactions and pre-clearance requests on a quarterly basis. All supervised persons at BMLLC must acknowledge the terms of the Code of Ethics annually, or as amended. The Code of Ethics is available upon request.

Employee accounts that are managed by an Investment Advisor in which the employee exercises no discretion over individual securities to be purchased or sold are exempt from transaction reporting requirements. The exception to this exemption is employee accounts managed by BMLLC. Such accounts are viewed as principal accounts. BMLLC recognizes the conflicts that may exist when

managing principal accounts alongside client accounts. Transactions and allocations to principal accounts, while not subject to pre-clearance, are regularly reviewed to verify fair treatment with other accounts managed under the same strategy. As a result of the smaller size of the principal accounts, the accounts are likely to contain larger allocations (as measured by duration contribution/market value of individual holdings as a percent of the portfolio) of fewer positions (less diversification) and as such may over/under perform larger accounts of a similar strategy due to differences in diversification and individual portfolio guideline restrictions. Execution of cross transactions between principal accounts and client accounts is not permitted.

The Code of Ethics is designed to verify that the personal securities transactions, activities and interests of the employees of BM LLC will not interfere with (i) decision making in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code certain classes of securities have been designated as exempt transactions, based upon a determination that these would not materially interfere with the best interest of BM LLC's clients.

Item 12 – Brokerage Practices

Broker Selection:

BM LLC will endeavor to select those brokers or dealers that it believes will provide the best services and/or rates possible. When selecting a brokerage firm, the Investment Policy Committee considers its execution capabilities, financial stability and ability to maintain confidentiality, and research and other services that help BM LLC in providing investment advisory services to clients. BM LLC may therefore recommend the use of or select a broker/dealer who provides useful research and securities transaction services even though a lower commission may be charged by a different broker/dealer who offers no research services or minimal securities transaction assistance. Research or other services paid for through broker commissions may or may not be useful in servicing the account for which the particular transaction was effected and not all clients may participate in commissioned trades.

When client brokerage commissions are used to obtain research or other products and services BM LLC receives a benefit in that research, products, or services that would have otherwise been paid for directly by BM LLC are attained through the use of commission recapture programs. The existence of such programs provides an incentive for BM LLC to select or recommend a broker-dealer based on the interest in receiving research or other products or services rather than on our clients' interest in receiving the best available price. Trade executions and broker-dealer trade volumes are periodically reviewed to verify such activity is not excessive or materially impactful to client accounts.

Soft dollar transactions shall be in compliance with Section 28(e) of the Securities Exchange Act of 1934. Products for which commissions are used, in part or in total, for remuneration include independent research reports, modeling/analytics software, pricing services, software to transmit market data to

overhead displays, and software used in part to facilitate the execution of orders. Additionally, BMLLC currently has one product determined to be a “mixed use” product, since it provides some benefits covered by Section 28(e) of the Securities Exchange Act of 1934. The portion not covered by the safe harbor, determined by an assessment of the product’s features and use, is paid directly by BMLLC.

BMLLC will occasionally “pay up” on select U.S. Treasury transactions of \$10 million or more conducted through one of our approved soft dollar brokers by paying up to an additional 1/32 in commissions. In some instances an approved soft dollar broker will be able to provide a more favorable price on a corporate bond trade than other approved non-soft dollar brokers. In such an instance the corporate trade may be done with the soft dollar broker with a portion of the price differential allocated to the client and the remainder allocated to commissions. In situations where the price differential is minute the entire difference may be allocated to commissions.

Brokerage for Client Referrals:

Receipt of client referrals from a broker-dealer or other third party by BMLLC, or a related person, is not considered when selecting or recommending broker-dealers.

Directed Brokerage:

For clients in wrap programs or otherwise directing BMLLC to use a particular broker dealer: To the extent BMLLC uses only that broker for the Account, Client acknowledges that BMLLC will not negotiate brokerage commissions with the specified broker, and as a result, Client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the Account than would otherwise be the case if BMLLC used other or multiple brokers. Directed brokerage accounts will trade sequentially after non-directed brokerage accounts. Where multiple directed brokerage accounts are managed with separate directed brokers, all directed brokerage accounts will be entered into a sequential rotation to ensure that no single directed brokerage account will receive favorable first trade priority. The Client may designate its own broker through whom BMLLC will execute securities transactions by written notice to BMLLC. BMLLC does not have any clients, past or present, that obligate BMLLC to trade with a specific broker; the trade sequencing policy has been developed to outline how such a client arrangement would be managed should such an arrangement arise.

Trading Practices/Order Aggregation:

Orders for the same security entered on behalf of more than one client will generally be aggregated (i.e., blocked or bunched) subject to the aggregation being in the best interests of all participating clients. All clients participating in each aggregated order shall receive the average price and, subject to minimum ticket charges, pay a pro-rata portion of commissions provided account is eligible to participate in commissioned trades. If the entire order is filled, clients shall receive their portion of the allocation specified on the trade ticket. In the event an order is “partially filled”, the allocation shall be made in the best interests of all the clients in the order, taking into account relevant factors, including, but not limited to, the size of each client’s allocation, account strategy, current duration exposure to sector or

issuer, clients' liquidity needs and previous allocations. In most cases, accounts will get a pro-forma allocation based on the initial allocation.

BM LLC will also apply this policy if an order is "over-filled", such as when a new issue designation is greater than initially allocated. One exception is if the security is an out-of-index position for some accounts and an in-index position in other accounts. For example, accounts that have a high-yield benchmark receive first priority in buying high-yield bonds. Accounts that do not have a high-yield benchmark receive first priority in selling high-yield bonds.

Cross Trades:

Generally, BM LLC will not conduct cross-trades unless it is in one client's best interest to sell a security while it is in another client's best interest to buy the same security. For such trades, the firm is able to obtain better bid and/or ask prices by effecting a cross-trade, whereby BM LLC effects a buy and sell of the security through a broker into each client's account. BM LLC maintains policies and procedures to prevent conflicts of interest and verify that no client is disadvantaged when processing such trades. Principal accounts, ERISA accounts, government pension accounts, and performance based fee accounts are prohibited from participating in cross transactions under company policies.

BM LLC may execute over-the-counter securities transactions on an agency basis. In these circumstances, clients may incur two transaction costs for a single trade: a commission paid to the executing broker-dealer plus the dealer's mark-up/down, which is included in the offer or bid price of the securities purchased or sold.

Item 13 – Review of Accounts

The Investment Policy Committee, which consists of the two Managing Partners (Edward Bradford and Zeldia Marzec) and the Senior Portfolio Managers (Douglas Lopez, Jeffrey Brothers, Terry Reidt and Graham Allen), extensively reviews all investment accounts no less than monthly. A more intensive review may be triggered by significant changes in the market or general economic expectations or changes in client portfolio restrictions which may affect the policy guidelines established for the account.

A compliance system, monitored and administered by the Chief Compliance Officer, reviews all sector, security, quality, duration and maturity guidelines on a daily basis to verify adherence to the overall portfolio construction objectives of each account. Performance is reviewed within the appropriate parameters as established by the client account guidelines or the policy committee.

For global accounts, reviews are conducted weekly. More frequent reviews may be conducted as dictated by market events. Investments are constantly monitored to verify that changes in market values do not break policy guidelines. These guidelines include limits of exposure by country and currency as well as controls on the use of derivatives.

SMA/Private Wealth Management and Wrap clients are typically furnished statements solely from the program sponsor. Accounting and reporting performed by BMLLC for these accounts is for company use. For all other accounts, quarterly reports are furnished to investment management clients concerning their investment accounts. A higher frequency of reports is issued to client accounts only if specifically requested. Quarterly account reports include a review and statement summary of transactions, holdings, income, capital gains or losses, market valuation and performance.

Quarterly reports for global clients also include listings of all non-dollar investments showing currency exposure, market valuation of forward contracts, gains and losses and income in foreign currency translated into U.S. dollars.

Our monthly global investment research summary is also available to clients upon request.

Item 14 – Client Referrals and Other Compensation

BMLLC currently does not compensate or receive compensation from any entity in connection with client referrals. BMLLC does not currently enlist the assistance of third party solicitors.

Item 15 – Custody

Clients should receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains client's investment assets. BMLLC urges you to carefully review such statements and compare such official custodial records to the account statements that we may provide to you. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities. BMLLC does not currently maintain custody over any client accounts or assets.

Item 16 – Investment Discretion

BMLLC typically receives discretionary authority from the client at the outset of an advisory relationship to select the identity and amount of securities to be bought or sold. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account and in compliance with client requested investment restrictions contained within the Investment Management Agreement.

When selecting securities and determining amounts, BMLLC observes the investment policies, limitations and restrictions of the clients for which it advises. For registered investment companies, authority to trade securities granted to BMLLC may also be limited by certain federal securities and tax laws that require diversification of investments and favor the holding of investments once made.

Investment guidelines and restrictions must be provided to and signed off on by BMLLC in writing.

Item 17 – Voting Client Securities

BM LLC, as a fixed income only advisor, does not receive, vote, or act upon proxies on behalf of advisory clients. Voluntary corporate actions on holdings in client portfolios are acted upon by BM LLC in accordance with what is viewed as our clients' best interest.

Item 18 – Financial Information

BM LLC is required to provide you with certain financial information or disclosures about our financial condition. BM LLC has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.