

Item 1 – Cover Page

Trumbower Financial Advisors, LLC

Disclosure Brochure

Part II of Form ADV: Uniform Application for Investment Advisor Registration

March 15, 2012

This Brochure provides information about the qualifications and business practices of Trumbower Financial Advisors, LLC (“TFA”) or “Advisor.” The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or by any state securities authority. If you have any questions about the contents of this Brochure, please contact us.

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TFA is a registered investment adviser. Registration does not imply any level of skill or training. An adviser’s oral and written communications should be considered in your decision to engage them. Additional information about TFA is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 – Material Changes

There were no material changes since our last ADV update on March 16, 2011.

Please contact Elizabeth Lombardi at (301) 215-8340 or esl@trufinancial.com to request a copy of our Brochure. It is also available on our web site www.trufinancial.com.

The SEC's web site www.adviserinfo.sec.gov also provides information about TFA and any affiliated individuals who are registered as investment adviser representatives of the Firm.

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Item 4 – Advisory Business

TFA is a Maryland Limited Liability Company established in 1996. Victoria M. Trumbower is the sole owner and managing member. The Firm offers comprehensive financial planning and tax compliance services. As such, we frequently deliver advice that is only marginally related to investments including estate planning, retirement planning, cash flow management, budgeting and tax planning.

TFA uses a five-step investment advisory process. We begin by identifying the client's objectives, risk parameters, liquidity needs and other relevant factors. This typically involves the development and presentation of a long-range personal financial plan. Second, we evaluate the client's existing asset allocation in view of the criteria established in step one. The Third Step is the selection of a theoretically efficient target portfolio allocation within the context and constraints identified in Steps One and Two. In Step Four, the Advisor helps clients determine the most effective methods of implementing their investment policies. Finally, the Advisor and client agree on a suitable schedule and procedures for reviewing portfolio performance and rebalancing.

Background information, the target portfolio mix, strategies to be employed and security selection guidelines are articulated in a written Investment Policy Statement ("IPS"). The IPS is a dynamic document that will be updated as appropriate when circumstances change. It is designed to provide specific, personalized information that any advisor would need to implement the client's plan. The IPS does not presume that the client will engage TFA to manage investments.

Supervision of assets held in brokerage accounts over which TFA has discretionary or non-discretionary managerial authority is one alternative clients may choose. If TFA is engaged to execute investment policies, we will implement target portfolio in accordance with a pre-approved detailed implementation plan.

TFA may also refer clients to brokers or other registered investment advisors for implementation. Specific recommendations made by those advisors may be reviewed by the Advisor to assure that they are suitable and cost effective.

Upon request, TFA may prepare in-depth analysis and evaluations of investment opportunities that are offered to clients by unrelated third parties. Advisor will express an opinion as to the suitability of these prospects by testing them against criteria articulated in the client's IPS and in the context of other facts and circumstances that may subsequently arise. Advisor will also comment on income and estate planning implications as appropriate.

Certain client portfolios may be highly concentrated in a few equity securities. Advisor will collect and analyze both fundamental and technical data in order to help clients assess risk and prudently achieve a desired level of diversification.

Total assets under management ("AUM") are \$675,883,993 as of 12/31/2011. This includes \$213,830,997 in discretionary and \$462,052,996 in non-discretionary accounts. TFA's client portfolios often include a Conservative Fixed Income component comprised of individual debt securities that meet strict quality and maturity criteria. TFA must have discretionary authority to purchase securities within pre-approved parameters to effectively manage this portfolio segment.

Item 5 – Fees and Compensation

TFA is compensated solely by fees for services rendered. Clients may choose to pay for services in one of three ways, and all fees are negotiable:

1. At hourly rates for time spent plus out-of-pocket expenses. Hourly rates may range from \$195 to \$500, depending on the Advisor representative's level of experience. Standard hourly rates are subject to change at Advisor's discretion without prior notice.
2. For a fixed quarterly or annual retainer. Retainers are available for general financial planning and tax compliance clients. Investment management services provided under these arrangements are incidental to the Advisor's primary role.
3. As a percentage of assets under management. Custody, maintenance, transaction and other fees may be charged by other third parties. Fees may be negotiated depending on the nature of the assets, planning relationships, frequency of review, reporting and rebalancing activities.

Assets Under Proactive Management	Annual % of Portfolio Value*
Under \$500,000	1.0%
\$ 500,000 to \$1,000,000	0.75%
\$1,000,001 to \$5,000,000	0.50%
Over \$5,000,000	0.30%

* Rate applicable to management of individual equity securities will be the greater of 0.50% or the rate under normal fee schedule. The percentage applicable to implementation of passively managed debt securities (bond ladder) will not, generally, exceed .3% - as long as total assets under management exceed a minimum threshold.

Clients may choose to exclude specific securities, accounts and/or cash balances from value of assets under management when assets are held in accounts under Advisor's supervision for administrative convenience. Advisor will execute transactions involving these assets as instructed by clients but Advisor will not provide pro-active, day-to-day supervision of excluded portfolio components.

Compensation based on hourly rates is payable after services are rendered. Time is generally billed monthly. Retainers are typically billed during the quarter in which services are rendered. Exceptions may occur when client is served in connection with an employer-sponsored financial

counseling program, in which case fees are billed in a manner that is consistent with the employer's billing procedures. Fees based on a percentage of assets under management are billed quarterly in arrears. As a convenience, fees will be transferred from client accounts to the Advisor's account after quarterly performance reports and a detailed invoice have been delivered to the client. Clients may also choose to remit fees from other resources.

Investment advisory services may be terminated by written notification. Fees based on the value of assets on the effective date of the termination are prorated for the number of days under supervision during the quarter. Since investment advisory fees are never billed in advance, TFA has not established formal refund procedures. In the rare instances of a billing error or negotiated reduction in fees, refunds are either issued in cash or credited against fees for future services, at the client's discretion. All bills are reviewed for accuracy by a manager or the managing member prior to release.

Fees and expenses charged by mutual funds, exchange-traded funds ("ETF") and other pooled investment products that Advisor recommends are paid to managers and sponsors from capital invested and income earned. These costs are disclosed in tables located near the front the fund's prospectus. General descriptions and estimated fees charged by recommended funds accompany IPS reports or other communications presented to clients by Advisor. TFA never receives any portion of the fees or expenses paid to mutual funds or other product sponsors.

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

TFA does not charge performance-based¹ fees of any kind under any circumstances.

Item 7 – Types of Clients

TFA provides portfolio management and investment advice to individuals, families, small pension and profit-sharing plans, charitable organizations, foundations, trusts, estates and personal service corporations. There are no minimum account size requirements.

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

A client's overall portfolio allocation target evolves as described in Item 4. Advisor considers all assets including those held by related entities and outside accounts under our supervision. Unless it is determined through the financial planning process or a client represents that capital has a long-term time horizon, a Conservative Fixed Income ("CFI") component will be recommended. The minimum recommended CFI target is typically equivalent to the present value of projected or desired future withdrawals over rolling ten-year periods. After "needs driven" CFI target is achieved, it is appropriate to invest in a selection of diversified equity securities. Clients should expect variation in the value of all investments. The range of possible

¹ Fee based on a share of capital gains or other measure of return on an account or investment.

outcomes is unpredictable, but the historical level of volatility experienced by securities used to meet a CFI portfolio component is significantly lower than the stock or broad bond markets.

Ideally, CFI portfolio is comprised of AAA-rated municipal bonds (largely pre-refunded or escrowed-to-maturity), brokered FDIC-insured CDs or Treasury securities with maturity dates staggered in relatively equal proportions from one to four years (maximum 56 months). We develop a taxable equivalent yield table unique to each client. Securities that offer the highest after-tax yield for a particular client are purchased. Bonds are intended to be held to maturity, but can be sold if unexpected liquidity needs arise.

If liquidity is not needed, redemption proceeds are reinvested in securities scheduled to mature in approximately four years. Primary objective is preservation of purchasing power. We do not speculate on direction of interest rates or compromise credit quality in search of above-market returns.

When amounts are insufficient to maintain diversified ladder, short-term managed Fixed Income mutual funds with above-average credit quality may be recommended. Advisor also recommends a number of managed Fixed Income funds with slightly longer average duration and somewhat lower average credit quality. These investments may be appropriate to fill portfolio component with intermediate-term time horizon after the needs-driven CFI target has been met.

Advisor has concluded that “separately managed accounts” provide no meaningful advantages over mutual funds. They are often more expensive, inconvenient and difficult to replace. The Firm does not maintain any relationships with separate account managers. With limited exceptions, Advisor encourages clients to participate in stock markets through managed equity mutual funds and unleveraged broad index ETFs.

TFA thoroughly and continuously reviews funds recommended to clients. We recognize that the average mutual fund manager cannot consistently out-perform the “market”. We, therefore, do not expect to hold funds indefinitely. Studies suggest that our proprietary selection criteria have successfully identified managers who deliver excess returns within some asset classes and over some periods of time. Following are a few of the general guidelines:

1. Size: Small and Mid Cap Equity funds with assets under \$5 billion (\$2 billion for Small Cap funds.) Less of an issue within Large Cap US Equity asset class.
2. Experience: Managers that have consistently followed a well-defined approach for at least five years. Tenure and team approach valued.
3. Performance: Better than average risk-adjusted performance during the last three and five years. Rank within the top 30% of peers over those periods.

4. Absence of Market Timing: We seek funds that are fully invested – or maintain reasonable, consistent cash balances.
5. Focus: Asset allocation and hybrid funds are most appealing to investors who do not have enough capital to effectively diversify among all asset classes. Not suitable tools for achieving a target portfolio mix. Similarly, we avoid managers who have a reputation or exhibit tendency to abandon stated objectives in search of recent favorites.
6. Efficiency: Funds and managers with lower expense ratios and lower turnover ratios (when compared to others with the same investment objective) are preferred, but consistent, superior net performance may justify higher ratios.
7. Client Service: Access to managers, transparency and responsiveness – especially during periods of poor performance – are important qualities.

Advisor attempts to focus higher turnover, more aggressive and less tax efficient managed funds within tax-deferred accounts that have a long-term time horizon. Lower cost more tax efficient ETFs are frequently included in taxable portfolios.

TFA employs a number of strategies for managing concentrated stock positions and for consolidating individual equities into funds or ETFs in a prudent, cost effective manner.

Risk of Loss.

There is no guarantee that the investment objectives of a particular fund or portfolio will be achieved. Mutual funds and brokerage accounts are not insured or guaranteed by the Federal Deposit Insurance Corporation or any other government agency. The use of pooled investment products eliminates risk of loss due to the bankruptcy of a particular issuer, but prices will fall and clients can lose capital if they are forced to sell following a decline or values do not recover within their time horizon.

Types of risk that clients must consider include:

1. Market risk: Markets on which individual underlying fund securities trade may decline across the board. Adverse economic conditions, deflated investor confidence and diminishing liquidity may depress an entire market or segment, regardless of the circumstances surrounding a particular stock or bond.
2. Style risk: Fund managers frequently employ investment selection processes that result in a concentration of stocks with characteristics consistent with a particular style. Management styles go in and out of favor over cycles that are not generally predictable.

3. Selection risk: Prospects for success depend on whether an active manager's judgment about the current value and appreciation potential of the companies and industries selected is accurate.
4. Credit risk: The holder of a particular bond may lose money if the issuer or guarantor is unable to make timely principal and interest payments. Similarly, if an investor needs to sell a bond prior to maturity, credit worthiness will affect its price.
5. Interest rate risk: The value of a Fixed Income security moves inversely with market interest rates. As the market rate rises, the price of a bond or CD will fall. The investor is locked into a yield that may become uncompetitive. Fixed Income securities with longer durations are typically more sensitive to interest rate changes leading to a higher level of volatility compared to those with shorter maturity.
6. Currency risk: Prices of funds holding foreign securities may go down when other currencies decline in value relative to the Dollar.
7. Other Foreign risks: Political instability and lack of reliable information about foreign issuers may enhance the risk of loss when investing in the securities of offshore entities traded on international exchanges.

Advisor considers each client's situation to gauge risk tolerance. Recommendations are focused on avoiding higher risk investments with capital that has a near-term time horizon and in situations where loss of principal is unacceptable.

Item 9 – Disciplinary Information

Registered investment advisers are required to disclose facts regarding any legal or disciplinary events that could have a material influence on your evaluation of Advisor or the integrity of Advisor's management. TFA has no information to disclose under this Item.

Item 10 – Other Financial Industry Activities and Affiliations

TFA is an independent registered investment advisor registered with the SEC. TFA is not affiliated with any other businesses. TFA does not accept commissions, referral fees or any "soft dollars"² from brokers, fund families or any other product supplier.

The Advisor's mission is to offer clients a source of independent comprehensive financial planning advice. Specific services include wealth transfer and retirement planning, insurance needs assessments, individual and fiduciary tax planning and tax compliance. Approximately

²Research products, software tools, travel, dues or fees to attend conferences and meetings offered as remuneration for the recommendation or use of a sponsor's products.

25% of our time is devoted to general financial planning; 10% to wealth transfer planning and assistance with estate administration; 20% of our time is spent on income tax compliance and 45% is related to investment advice and management.

Item 11 – Code of Ethics

TFA maintains a written Code of Ethics (“Code”) that sets forth standards of business conduct required of all employees. The Code establishes guidelines for personal investment and other activities that may create conflicts of interest between employees and our clients. The Code is based on the principle that employees have a fiduciary duty to place the interests of clients above their own. It also references compliance with a strictly interpreted policy prohibiting any form of insider trading. TFA’s Chief Compliance Officer enforces procedures for identifying and responding to violations of the Code and related policies. A copy of our Code of Ethics is available upon request.

Acting as agent, TFA initiates securities transactions in accordance with guidelines articulated in an IPS, or comparable communication, and a pre-approved implementation schedule. TFA is compensated for this aspect of the management process in the fees charged under one of the arrangements described under Item 5.

TFA may recommend investments to clients that our employees and managing member currently own. Employee (and related family) trades are continually monitored to assure compliance with the Code of Ethics and other policies and procedures that are intended to prevent conflicts of interest between TFA and its clients.

Employees found to have violated the Code of Ethics and trading restrictions are subject to sanctions that may include a letter of reprimand, additional continuing education, suspension or termination. Violations of insider trading policies are subject to additional penalties imposed by Federal or state regulatory authorities, including the revocation of licenses, substantial monetary fines and/or imprisonment.

Item 12 – Brokerage Practices

As previously noted, TFA does not receive remuneration or other incentives from the custodians it recommends to clients. We have no reason to maintain our relationship with a custodian if it is not in the best interests of our clients. There are logistical considerations that discourage changes to or the establishment of multiple custodial arrangements. TFA formally evaluates its execution results annually by considering the following factors:

1. Execution Capability - Average execution speed, percentage of shares executed at a price in excess of NBBO³ and average effective spread are compared to industry standards. The availability of electronic trade entry and effective reporting link is important as well.
2. Commission Rates and Transaction Fees – Commissions and transaction fees offered to TFA clients are determined by FIWS⁴. The Firm regularly negotiates discounts for clients with special circumstances such as the liquidation of a large volume of small/odd lot positions. TFA surveys other custodians and requests adjustments from FIWS to stay competitive.
3. Responsiveness - TFA considers its custodian's responsiveness to requests for data, special client situations, administrative support and problem resolution.

Our investment philosophy and customized portfolio designs are not conducive to equity block trading. Fixed Income block trades do occur and securities are subsequently allocated to client accounts on a random basis.

Item 13 - Review of Accounts

All portfolios we manage are reviewed by an associate and a manager at least quarterly to evaluate performance and suitability in achieving objectives. The performance of major asset class components of the portfolio and specific funds is compared to appropriate benchmarks. Rebalancing may be recommended for a variety of reasons, including changes in the client's situation or general economic and market trends.

Assets held in employer-sponsored 401(K) plans and deferred compensation arrangements are considered in the quarterly review process and may be analyzed more frequently as TFA assists clients implementing strategies involving these assets.

The Advisor maintains a database of recommended mutual funds and concentrated positions held by clients. If information comes to our attention that may have a material impact on these positions, we review each account containing the affected investments and communicate recommended courses of action to each client.

Portfolios are reviewed by the Advisors' representatives listed on TFA's Brochure Supplement.

Clients receive monthly statements from custodians for all accounts in which there has been activity over the previous 30 days. At a minimum, custodian's statements are mailed quarterly directly to clients. Statements provided by the custodian list the positions at market values at the end of the period along with all transactions occurring during the period.

³ National Best Bid and Offer. The best available bid or ask price when executing security transactions.

⁴ Fidelity Institutional Wealth Services.

TFA provides a quarterly performance report to all clients with discretionary management agreements and all other clients who have engaged us to do so. TFA performs monthly account reconciliations to confirm that our performance reporting system is consistent with custodial statements. TFA urges clients to carefully review their statements and compare them to the list of positions presented in our reports. Values may vary from the custodian's statements for a number of reasons including reporting dates or valuation methodologies. TFA maintains documentation explaining any deviation.

Advisor's reports include:

1. List of positions, grouped by major asset class, at quarter-end market values – as determined by the custodian – consolidated and for each account.
2. Performance history in the form of Internal Rates of Return ("IRR") computed for each quarterly period during the year, year-to-date and annualized inception-to-date – consolidated and for each account.
3. Returns are presented for the account/portfolio in the aggregate as well as the five major equity asset classes and CFI component. The returns achieved by four major equity market indices and the 1-5 year US Treasury index are noted for each period as well.
4. A variety of special reports are available by request.

Every performance report is accompanied by a customized highlight summary and list of non-urgent recommendations.

Item 14 – Client Referrals and Other Compensation

TFA does not accept compensation from any source for referrals or for the recommendation of products to clients. This includes economic benefits such as sales awards, prizes or soft dollars. The securities and custodial services we recommend are based solely on our evaluation of their suitability in meeting clients' needs. TFA is included on a list of advisors that may be referred to retail clients of the custodian who request assistance that exceeds the scope of their expertise. TFA does not take any action to solicit these referrals.

Item 15 – Custody

TFA has authority to debit management fees directly from client accounts. For this reason only, we have assumed "limited" custody of client assets as defined by SEC Rule 206(4)-2 (Custody of Funds or Securities of Clients by Investment Advisors) under the Investment Advisors Act of 1940. TFA receives duplicates (via mail or electronically) of the account statements sent to clients by custodian. TFA has access to interim information about positions and transactions through our agreement with the custodian. TFA transmits instructions and forwards account

applications or other communications to the custodian on the client's behalf. Deposits are made by checks payable to the custodian or electronic transfers from other institutions.

Item 16 – Investment Discretion

Except as noted below, TFA offers clients a choice between Discretionary and Non-Discretionary investment management relationships.

Clients grant TFA authority to initiate trades at the outset of the engagement in accordance with the terms and conditions stated in our investment advisory agreement (contract) and the client's agreement with the custodian. Under the terms of a Discretionary agreement, TFA is authorized to choose the securities and amounts that will be bought or sold without the client's prior express approval. TFA is not authorized to purchase or sell securities without the client's prior approval when operating under a Non-Discretionary arrangement.

In all cases, however, TFA will act strictly in accordance with a particular client's objectives, policies, preferences, restrictions and other factors enumerated in their IPS. All clients must approve a detailed implementation plan, regardless of discretionary status. Except as noted below, any deviation from an approved implementation schedule will be communicated to clients in advance. TFA may take action before receiving express approval when acting under Discretionary arrangements.

If the implementation plan includes establishment and maintenance of a CFI portfolio component in the form of "laddered" debt instruments, clients must grant TFA discretion to purchase and/or sell individual bonds, certificates of deposit or other securities without prior express approval. All of the securities managed under such an arrangement will meet credit quality standards and will be consistent with the achievement of a target maturity schedule that the client and TFA have previously agreed upon.

CFI portfolios are included in TFA's calculation of Discretionary assets under management in ADV Part I Item 5. F.

Item 17 – Voting Client Securities

TFA does not have the authority to, and does not as a matter of Firm policy, vote proxies on behalf of clients or provide proxy voting advice. Clients receive proxies directly from a custodian or transfer agent and are solely responsible for voting. Upon request, TFA will provide clients with additional information or clarify statements made within proxies.

Item 18 – Financial Information

There are no financial commitments or circumstances that would impair TFA's ability to meet contractual and fiduciary responsibilities to clients. The Advisor has not sought or received protection from creditors in a bankruptcy proceeding.