

**Part 2A of Form ADV: *Firm Brochure***



**SYM Financial Corporation**

801 Park Avenue  
Winona Lake, IN 46590

Telephone: 574-267-2300  
Email: [Info@sym.com](mailto:Info@sym.com)  
Web Address: [www.sym.com](http://www.sym.com)

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This brochure provides information about the qualifications and business practices of SYM Financial Corporation. If you have any questions about the contents of this brochure, please contact us at 574-267-2300 or [info@sym.com](mailto:info@sym.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about SYM Financial Corporation also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search this site by a unique identifying number, known as a CRD number. Our firm's CRD number is 107517.

## **Item 2    Material Changes**

The SEC adopted "Amendments to Form ADV" in July, 2010. This Firm Brochure, dated 03/31/2011, is our new disclosure document prepared according to the SEC's new requirements and rules. As you will see, this document is a narrative that is substantially different in form and content, and includes some new information that we were not previously required to disclose.

After our initial filing of this Brochure, this Item will be used to provide our clients with a summary of new and/or updated information. We will inform you of the revision(s) based on the nature of the updated information.

Consistent with the new rules, we will ensure that you receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year. Furthermore, we will provide you with other interim disclosures about material changes as necessary.

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## **Item 4    Advisory Business**

SYM Financial Corporation is a SEC-registered investment adviser with its principal place of business located in Indiana. SYM Financial Corporation began conducting business as a SEC-registered investment adviser in 1985.

Listed below are the firm's principal shareholders (i.e., those individuals and/or entities controlling 25% or more of this company).

- Jerald William Yeager, CEO

SYM Financial Corporation offers the following advisory services to our clients:

### **INVESTMENT SUPERVISORY SERVICES ("ISS") INDIVIDUAL PORTFOLIO MANAGEMENT**

Our firm provides continuous advice to a client regarding the investment of client funds based on the individual needs of the client. Through personal discussions in which goals and objectives based on a client's particular circumstances are established, we develop a client's personal investment policy and create and manage a portfolio based on that policy. During our data-gathering process, we determine the client's individual objectives, time horizons, risk tolerance, and liquidity needs. As appropriate, we also review and discuss a client's prior investment history, as well as family composition and background.

We manage these advisory accounts on a discretionary or non-discretionary basis. Account supervision is guided by the client's stated objectives (i.e., maximum capital appreciation, growth, income, or growth and income), as well as tax considerations.

Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors.

Our investment recommendations are not limited to any specific product or service offered by a broker-dealer or insurance company and will generally include advice regarding the following securities:

- Exchange-listed securities
- Securities traded over-the-counter
- Foreign issuers
- Warrants
- Corporate debt securities (other than commercial paper)
- Commercial paper
- Certificates of deposit
- Municipal securities
- Variable life insurance
- Variable annuities
- Mutual fund shares
- United States governmental securities

- Options contracts on securities
- Options contracts on commodities
- Futures contracts on tangibles
- Futures contracts on intangibles
- Interests in partnerships investing in real estate
- Interests in partnerships investing in oil and gas interests
- Interests in partnerships: SYM Financial Corporation has provided advice concerning partnership interests in miscellaneous businesses.
- Other: The firm also has provided advice concerning investments in tangible assets such as precious metals.

Because some types of investments involve certain additional degrees of risk, they will only be implemented/recommended when consistent with the client's stated investment objectives, tolerance for risk, liquidity and suitability.

### **PENSION CONSULTING SERVICES**

We also provide several advisory services separately or in combination. While the primary clients for these services will be pension, profit sharing and 401(k) plans, we offer these services, where appropriate, to individuals and trusts, estates and charitable organizations. Pension Consulting Services are comprised of four distinct services. Clients may choose to use any or all of these services.

#### *Investment Policy Statement Preparation (hereinafter referred to as "IPS"):*

We will meet with the client (in person or over the telephone) to determine an appropriate investment strategy that reflects the plan sponsor's stated investment objectives for management of the overall plan. Our firm then prepares a written IPS detailing those needs and goals, including an encompassing policy under which these goals are to be achieved. The IPS also lists the criteria for selection of investment vehicles as well as the procedures and timing interval for monitoring of investment performance.

#### *Selection of Investment Vehicles:*

We assist plan sponsors in constructing appropriate asset allocation models. We will then review various mutual funds (both index and managed) to determine which investments are appropriate to implement the client's IPS. The number of investments to be recommended will be determined by the client, based on the IPS.

#### *Monitoring of Investment Performance:*

We monitor client investments continually, based on the procedures and timing intervals delineated in the Investment Policy Statement. Although our firm is not involved in any way in the purchase or sale of these investments, we supervise the client's portfolio and will make recommendations to the client as market factors and the client's needs dictate.

#### *Employee Communications:*

For pension, profit sharing and 401(k) plan clients with individual plan participants exercising control over assets in their own account ("self-directed plans"), we may also provide quarterly educational support and investment workshops designed for the plan participants. The nature of the topics to be covered will be determined by us and the client under the guidelines established in ERISA Section 404(c). The educational support and investment workshops will NOT provide plan participants with individualized, tailored investment advice or individualized, tailored asset allocation recommendations.

### **INDIVIDUAL PORTFOLIO MANAGEMENT**

Our firm provides non-continuous asset management of client funds based on the individual needs of the client. Through personal discussions in which goals and objectives based on the client's particular circumstances are established, we develop the client's personal investment policy. We create and manage a portfolio based on that policy. During our data-gathering process, we determine the client's individual objectives, time horizons, risk tolerance, and liquidity needs. As appropriate, we may also review and discuss a client's prior investment history, as well as family composition and background.

We manage these advisory accounts on a discretionary or non-discretionary basis. Account supervision is guided by the client's stated objectives (i.e., maximum capital appreciation, growth, income, or growth and income), as well as tax considerations.

Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors.

Once the client's portfolio has been established, we review the portfolio quarterly, and if necessary, rebalance the portfolio as needed, based on the client's individual needs.

Our portfolios for this service use similar securities as referenced in the Investment Supervisory Services ("ISS") Individual Portfolio Management section above. As with that service Individual Portfolio Management services also contain some types of investments involve certain additional degrees of risk, they will only be recommended when consistent with the client's stated investment objectives, tolerance for risk, liquidity and suitability.

### **FINANCIAL PLANNING**

We provide financial planning services. Financial planning is a comprehensive evaluation of a client's current and future financial state by using currently known variables to predict future cash flows, asset values and withdrawal plans. Through the financial planning process, all questions, information and analysis are considered as they impact and are impacted by the entire financial and life situation of the client. Clients purchasing this service receive a written report which provides the client with a detailed financial plan designed to assist the client achieve his or her financial goals and objectives.

In general, the financial plan can address any or all of the following areas:

- **PERSONAL:** We review family records, budgeting, personal liability, estate information and financial goals.
- **TAX & CASH FLOW:** We analyze the client's income tax and spending and planning for past, current and future years; then illustrate the impact of various investments on the client's current income tax and future tax liability.

- **INVESTMENTS:** We analyze investment alternatives and their effect on the client's portfolio.
- **INSURANCE:** We review existing policies to ensure proper coverage for life, health, disability, long-term care, liability, home and automobile.
- **RETIREMENT:** We analyze current strategies and investment plans to help the client achieve his or her retirement goals.
- **DEATH & DISABILITY:** We review the client's cash needs at death, income needs of surviving dependents, estate planning and disability income.
- **ESTATE:** We assist the client in assessing and developing long-term strategies, including as appropriate, living trusts, wills, review estate tax, powers of attorney, asset protection plans, nursing homes, Medicaid and elder law.

We gather required information through in-depth personal interviews. Information gathered includes the client's current financial status, tax status, future goals, returns objectives and attitudes towards risk. We carefully review documents supplied by the client, including a questionnaire completed by the client, and prepare a written report. Should the client choose to implement the recommendations contained in the plan, we suggest the client work closely with his/her attorney, accountant, insurance agent, and/or stockbroker. Implementation of financial plan recommendations is entirely at the client's discretion.

We also provide general non-securities advice on topics that may include tax and budgetary planning, estate planning and business planning.

Typically the financial plan is presented to the client within six months of the contract date, provided that all information needed to prepare the financial plan has been promptly provided.

Financial Planning recommendations are not limited to any specific product or service offered by a broker-dealer or insurance company. All recommendations are of a generic nature.

### **AMOUNT OF MANAGED ASSETS**

As of 12/31/2011, we were actively managing \$ 699,983,963 of clients' assets on a discretionary basis plus \$163,586,617 of clients' assets on a non-discretionary basis.

## **Item 5 Fees and Compensation**

### **INDIVIDUAL PORTFOLIO MANAGEMENT FEES**

Our annual fees for Portfolio Management are based upon a percentage of assets under management and generally range up to 1% of investable assets or net worth.

<b>Plan Assets</b>	<b>Fee</b>
Assets up to \$1,500,000	1%
Assets between \$1,500,000 and \$3,000,000	0.80%
Assets between \$3,000,000 and \$5,000,000	0.60%

Assets between \$5,000,000 and \$10,000,000	0.40%
Assets above \$10,000,000	0.30%

Our fees are billed quarterly, in advance, at the beginning of each calendar quarter based upon the value (market value or fair market value in the absence of market value), of the client's account at the end of the previous quarter. Fees will be debited from the account in accordance with the client authorization in the Letter of Agreement.

A minimum of \$300,000 of assets under management is required for this service. This account size may be negotiable under certain circumstances. SYM Financial Corporation may group certain related client accounts for the purposes of achieving the minimum account size and determining the annualized fee.

### **WEALTH MANAGEMENT SERVICES FEES**

SYM Financial Corporation's annual wealth management fee is comprised of the above portfolio management fee plus an additional wealth management base fee. Without assets under the Portfolio Management offering, the base fee is \$7,500 per year. This additional fee decreases to \$0 when the portfolio management fee exceeds \$20,000 per year.

Our annual fees for Portfolio Wealth Management Services are based upon a percentage of assets under management.

<b>If Portfolio Management Fee is:</b>	<b>Add this Wealth Management Base Fee:</b>	<b>Minimum Total Fee is:</b>
\$0 to \$999	\$7,500	\$7,500
\$1,000 to \$1,999	\$7,500	\$8,500
\$2,000 to \$2,999	\$7,105	\$9,105
\$3,000 to \$3,999	\$6,711	\$9,711
\$4,000 to \$4,999	\$6,316	\$10,316
\$5,000 to \$5,999	\$5,921	\$10,921
\$6,000 to \$6,999	\$5,526	\$11,526
\$7,000 to \$7,999	\$5,132	\$12,132
\$8,000 to \$8,999	\$4,737	\$12,737
\$9,000 to \$9,999	\$4,342	\$13,342
\$10,000 to \$10,999	\$3,947	\$13,947
\$11,000 to \$11,999	\$3,553	\$14,553
\$12,000 to \$12,999	\$3,158	\$15,158
\$13,000 to \$13,999	\$2,763	\$15,763
\$14,000 to \$14,999	\$2,368	\$16,368
\$15,000 to \$15,999	\$1,974	\$16,974
\$16,000 to \$16,999	\$1,579	\$17,579
\$17,000 to \$17,999	\$1,184	\$18,184
\$18,000 to \$18,999	\$789	\$18,789
\$19,000 to \$19,999	\$395	\$19,395



above \$20,000	\$0	\$20,000
Wealth Management Minimum Total Fee is annualized for demonstration purposes		

Except for the Wealth Management Base Fee shown above, all fees are computed by applying the appropriate Portfolio Management fee schedule to the value of the assets on the first day of the applicable billing period and dividing by 4. For your convenience, all fees will be deducted from an account or accounts designated by you. In the absence of such designation, SYM Financial Corporation shall exercise discretion in determining from which accounts to deduct fees. The Wealth Management Base fee shall be invoiced, and is payable in advance of each period..

***Fees Billed in Advance:*** Our advisory fees are charged in advance at the beginning of each calendar quarter based upon the asset value (market or fair market value in the absence of market value, plus any credit balance or minus any debit balance), of the client's account equity at the end of the previous quarter.

When authorized by the client, fees are debited from the account in accordance with the terms set forth in the Letter of Agreement.

### **PENSION CONSULTING FEES**

Our fees for Pension Consulting Services are based on a percentage of assets under advisement, according to the following schedule:

<b>Plan Assets</b>	<b>Fee</b>
\$0 to \$500,000	0.80%
\$500,000 to \$800,000	0.75%
\$800,000 to \$1,000,000	0.70%
\$1,000,000 to \$2,000,000	0.65%
\$2,000,000 to \$3,000,000	0.60%
\$3,000,000 to \$5,000,000	0.55%
\$5,000,000 to \$7,500,000	0.50%
\$7,500,000 to \$10,000,000	0.45%
\$10,000,000 to \$12,500,000	0.40%
\$12,500,000 to \$ 15,000,000	0.35%
\$15,000,000 and over	Custom

Plan sponsors are invoiced in advance at the beginning of each calendar quarter.

A total minimum fee of \$10,000 is required. This minimum fee may prevent SYM Financial Corporation from providing services to very small ERISA plans.

### **FINANCIAL PLANNING FEES**

SYM Financial Corporation' Financial Planning fee is determined based on the nature of the services being provided and the complexity of each client's circumstances. All fees are agreed upon prior to entering into a contract with any client.

Our Financial Planning fees are calculated and charged on an hourly basis, ranging from \$50 to \$200 per hour. Although the length of time it will take to provide a Financial Plan will depend on each client's personal situation, we will provide an estimate for the total hours at the start of the advisory relationship.

We may request a retainer upon completion of our initial fact-finding session with the client; however, advance payment will never exceed \$500 for work that will not be completed within six months. The balance is due upon completion of the plan.

The client is billed quarterly in advance based on our total estimated Financial Planning fees.

### **GENERAL INFORMATION**

***Termination of the Advisory Relationship:*** A client agreement may be canceled at any time, by either party, for any reason upon receipt of written notice. As disclosed above, certain fees are paid in advance of services provided. Upon termination of any account, any prepaid, unearned fees will be promptly refunded. In calculating a client's reimbursement of fees, we will pro rate the reimbursement according to the number of days remaining in the billing period.

***Mutual Fund Fees:*** All fees paid to SYM Financial Corporation for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds and/or ETFs to their shareholders. These fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee. If the fund also imposes sales charges, a client may pay an initial or deferred sales charge. A client could invest in a mutual fund directly, without our services. In that case, the client would not receive the services provided by our firm which are designed, among other things, to assist the client in determining which mutual fund or funds are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the funds and our fees to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

***Additional Fees and Expenses:*** In addition to our advisory fees, clients are also responsible for the fees and expenses charged by custodians and imposed by broker dealers, including, but not limited to, any transaction charges imposed by a broker dealer with which an independent investment manager effects transactions for the client's account(s). Please refer to the "Brokerage Practices" section (Item 12) of this Form ADV for additional information.

***Grandfathering of Minimum Account Requirements:*** Pre-existing advisory clients are subject to SYM Financial Corporation' minimum account requirements and advisory fees in effect at the time the client entered into the advisory relationship. Therefore, our firm's minimum account requirements will differ among clients.

***ERISA Accounts:*** SYM Financial Corporation is deemed to be a fiduciary to advisory clients that are employee benefit plans or individual retirement accounts (IRAs) pursuant to the Employee Retirement Income and Securities Act ("ERISA"), and regulations under the Internal Revenue Code of 1986 (the "Code"), respectively. . As such, our firm is subject to specific duties and obligations under ERISA and the Internal Revenue Code that include among other things, restrictions concerning certain forms of compensation. To avoid

engaging in prohibited transactions, SYM Financial Corporation may only charge fees for investment advice about products for which our firm and/or our related persons do not receive any commissions or 12b-1 fees, or conversely, investment advice about products for which our firm and/or our related persons receive commissions or 12b-1 fees, however, only when such fees are used to offset SYM Financial Corporation's advisory fees.

**Advisory Fees in General:** Clients should note that similar advisory services may (or may not) be available from other registered (or unregistered) investment advisers for similar or lower fees.

**Limited Prepayment of Fees:** Under no circumstances do we require or solicit payment of fees in excess of \$1200 more than six months in advance of services rendered.

## **Item 6 Performance-Based Fees and Side-By-Side Management**

SYM Financial Corporation does not charge performance-based fees.

## **Item 7 Types of Clients**

SYM Financial Corporation provides advisory services to the following types of clients:

- Individuals (other than high net worth individuals)
- Pension and profit sharing plans (other than plan participants)
- Charitable organizations
- Corporations or other businesses not listed above

As previously disclosed in Item 5, our firm has established certain initial minimum account requirements, based on the nature of the service(s) being provided. For a more detailed understanding of those requirements, please review the disclosures provided in each applicable service.

## **Item 8 Methods of Analysis, Investment Strategies and Risk of Loss**

### **METHODS OF ANALYSIS**

We use the following methods of analysis in formulating our investment advice and/or managing client assets:

**Fundamental Analysis.** We attempt to measure the intrinsic value of a security by looking at economic and financial factors (including the overall economy, industry conditions, and the financial condition and management of the company itself) to determine if the company is underpriced (indicating it may be a good time to buy) or overpriced (indicating it may be time to sell).

Fundamental analysis does not attempt to anticipate market movements. This presents a potential risk, as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the stock.

**Technical Analysis.** We analyze past market movements and apply that analysis to the present in an attempt to recognize recurring patterns of investor behavior and potentially predict future price movement.

Technical analysis does not consider the underlying financial condition of a company. This presents a risk in that a poorly-managed or financially unsound company may underperform regardless of market movement.

**Risks for all forms of analysis.** Our securities analysis methods rely on the assumption that the companies whose securities we purchase and sell, the rating agencies that review these securities, and other publicly-available sources of information about these securities, are providing accurate and unbiased data. While we are alert to indications that data may be incorrect, there is always a risk that our analysis may be compromised by inaccurate or misleading information.

**Other:** SYM Financial Corporation also utilizes a philosophy of Top Down Tactical Asset Allocation. "Top Down" means analyzing market conditions and selecting investments that we believe will do well in those conditions. "Tactical" means strategically overweighing those asset classes we believe will do well in the future. "Asset Allocation" means we believe diversification of asset categories is key to long-term success.

## **INVESTMENT STRATEGIES**

We use the following strategy(ies) in managing client accounts, provided that such strategy(ies) are appropriate to the needs of the client and consistent with the client's investment objectives, risk tolerance, and time horizons, among other considerations:

**Long-term purchases.** We purchase securities with the idea of holding them in the client's account for a year or longer. Typically we employ this strategy when:

- we believe the securities to be currently undervalued, and/or
- we want exposure to a particular asset class over time, regardless of the current projection for this class.

A risk in a long-term purchase strategy is that by holding the security for this length of time, we may not take advantage of short-term gains that could be profitable to a client. Moreover, if our predictions are incorrect, a security may decline sharply in value before we make the decision to sell.

**Short-term purchases.** When utilizing this strategy, we purchase securities with the idea of selling them within a relatively short time (typically a year or less). We do this in an attempt to take advantage of conditions that we believe will soon result in a price swing in the securities we purchase.

A short-term purchase strategy poses risks should the anticipated price swing not materialize; we are then left with the option of having a long-term investment in a security that was designed to be a short-term purchase, or potentially taking a loss.

In addition, this strategy involves more frequent trading than does a longer-term strategy, and will result in increased brokerage and other transaction-related costs, as well as less favorable tax treatment of short-term capital gains.

**Short sales.** We borrow shares of a stock for your portfolio from someone who owns the stock on a promise to replace the shares on a future date at a certain price. Those borrowed

shares are then sold. On the agreed-upon future date, we buy the same stock and return the shares to the original owner. We engage in short selling based on our determination that the stock will go down in price after we have borrowed the shares. If we are correct and the stock price has gone down since the shares were purchased from the original owner, the client account realizes the profit.

Short selling results in some unique risks:

1. *Losses can be infinite.* A short sale loses when the stock price rises, and a stock is not limited (at least, theoretically) in how high it can go. For example, if you short 100 shares at \$50 each, hoping to make a profit but the shares increase to \$75 per share, you'd lose \$2,500. On the other hand, the price of a stock cannot fall below \$0, which limits your potential upside.
2. *Short squeezes can wring out profits.* As stock prices increase, short seller losses also increase as sellers rush to buy the stock to cover their positions. This increase in demand, in turn, further drives the prices up.
3. *Timing.* Even if we are correct in determining that the price of a stock will decline, we run the risk of incorrectly determining when the decline will take place, i.e., being right too soon. Although a company is overvalued, it could conceivably take some time for the price to come down; during which you are vulnerable to interest, margin calls, etc.
4. *Inflation.* History has shown that over the long term, most stocks appreciate. Even if a company barely improves over time, inflation should drive its share price up somewhat. In fact, short selling may not be appropriate in times of inflation for that very reason, as prices may adjust upwards regardless of the value of the stock.

**Margin transactions.** We will purchase stocks for your portfolio with money borrowed from your brokerage account. This allows you to purchase more stock than you would be able to with your available cash, and allows us to purchase stock without selling other holdings.

**Option writing.** We may use options as an investment strategy. An option is a contract that gives the buyer the right, but not the obligation, to buy or sell an asset (such as a share of stock) at a specific price on or before a certain date. An option, just like a stock or bond, is a security. An option is also a derivative, because it derives its value from an underlying asset.

The two types of options are calls and puts:

- A call gives us the right to buy an asset at a certain price within a specific period of time. We will buy a call if we have determined that the stock will increase substantially before the option expires.
- A put gives us the holder the right to sell an asset at a certain price within a specific period of time. We will buy a put if we have determined that the price of the stock will fall before the option expires.

We will use options to speculate on the possibility of a sharp price swing. We will also use options to "hedge" a purchase of the underlying security; in other words, we will use an option purchase to limit the potential upside and downside of a security we have purchased for your portfolio.

We use "covered calls", in which we sell an option on security you own. In this strategy, you receive a fee for making the option available, and the person purchasing the option has the right to buy the security from you at an agreed-upon price.

We use a "spreading strategy", in which we purchase two or more option contracts (for example, a call option that you buy and a call option that you sell) for the same underlying security. This effectively puts you on both sides of the market, but with the ability to vary price, time and other factors.

**Risk of Loss.** Securities investments are not guaranteed and you may lose money on your investments. We ask that you work with us to help us understand your tolerance for risk.

## **Item 9    Disciplinary Information**

We are required to disclose any legal or disciplinary events that are material to a client's or prospective client's evaluation of our advisory business or the integrity of our management.

Our firm and our management personnel have no reportable disciplinary events to disclose.

## **Item 10    Other Financial Industry Activities and Affiliations**

SYM Financial Corporation has a minority ownership interest in a savings and loan holding company, National Advisors Holdings, Inc. (NAH) that has formed a federally chartered trust company, "National Advisors Trust Company" (NATC). NAH and NATC are regulated by the Office of Thrift Supervision. The trust company intends to provide a low cost alternative to traditional trust service providers, and SYM Financial Corporation intends to refer clients to NATC for trust services, where appropriate.

Kruggel Lawton and Company: In the beginning of 2001, SYM Financial Corporation announced a strategic alliance with Kruggel Lawton and Company, an accounting firm. The Kruggel/SYM Advantage, LLC has been formed to facilitate a joint venture for cross-referral of clients. This is a special business alliance whereby clients of Kruggel Lawton and Company will have immediate access to the full scope of investment advisory and wealth management services provided by SYM, and the clients of SYM will likewise have access to the accounting services provided by Kruggel Lawton and Company.

Kruggel/SYM Advantage, LLC is physically separate from, but located within the same building as, the corporate headquarters of Kruggel Lawton and Company in South Bend, Indiana. As the opportunities expand throughout SYM and Kruggel Lawton's extensive client base, Kruggel/SYM Advantage, LLC will continually monitor the needs of the clients and respond accordingly.

SYM Financial Corporation and Kruggel Lawton and Company will remain completely separate and independent organizations. This strategic alliance provides the ability for SYM and Kruggel Lawton to increase the scope of services offered to their respective existing clients. This agreement is in no way intended to prohibit either Kruggel Lawton and Company or SYM Financial Corporation from entering other relationships, including joint venture agreements, or from referring clients to other accounting or financial advisory firms.

Where appropriate, SYM Financial Corporation and our employees may recommend the various investment and investment-related services of the related companies to our advisory clients. The related companies and their employees may also recommend the advisory services of our firm to their clients. The services provided by the related companies are separate and distinct from our advisory services, and are provided for separate and additional

compensation. There may also be arrangements between SYM Financial Corporation and these related companies where SYM Financial Corporation and/or the related companies and their employees receive payment in exchange for client referrals. No SYM Financial Corporation client is obligated to use the services of any of the related companies.

Clients should be aware that the receipt of additional compensation by SYM Financial Corporation and its management persons or employees creates a conflict of interest that may impair the objectivity of our firm and these individuals when making advisory recommendations. SYM Financial Corporation endeavors at all times to put the interest of its clients first as part of our fiduciary duty as a registered investment adviser; we take the following steps to address this conflict:

- we disclose to clients the existence of all material conflicts of interest, including the potential for our firm and our employees to earn compensation from advisory clients in addition to our firm's advisory fees;
- we disclose to clients that they are not obligated to purchase recommended investment products from our employees or affiliated companies;
- we collect, maintain and document accurate, complete and relevant client background information, including the client's financial goals, objectives and risk tolerance;
- our firm's management conducts regular reviews of each client account to verify that all recommendations made to a client are suitable to the client's needs and circumstances;
- we require that our employees seek prior approval of any outside employment activity so that we may ensure that any conflicts of interests in such activities are properly addressed;
- we periodically monitor these outside employment activities to verify that any conflicts of interest continue to be properly addressed by our firm; and
- we educate our employees regarding the responsibilities of a fiduciary, including the need for having a reasonable and independent basis for the investment advice provided to clients.

## **Item 11 Code of Ethics, Participation or Interest in Client Transactions and Personal Trading**

Our firm has adopted a Code of Ethics which sets forth high ethical standards of business conduct that we require of our employees, including compliance with applicable federal securities laws.

SYM Financial Corporation and our personnel owe a duty of loyalty, fairness and good faith towards our clients, and have an obligation to adhere not only to the specific provisions of the Code of Ethics but to the general principles that guide the Code.

Our Code of Ethics includes policies and procedures for the review of quarterly securities transactions reports as well as initial and annual securities holdings reports that must be submitted by the firm's access persons. Among other things, our Code of Ethics also requires the prior approval of any acquisition of securities in a limited offering (e.g., private placement) or an initial public offering. Our code also provides for oversight, enforcement and recordkeeping provisions.

SYM Financial Corporation' Code of Ethics further includes the firm's policy prohibiting the use of material non-public information. While we do not believe that we have any particular access to non-public information, all employees are reminded that such information may not be used in a personal or professional capacity.

A copy of our Code of Ethics is available to our advisory clients and prospective clients. You may request a copy by email sent to [info@sym.com](mailto:info@sym.com), or by calling us at 574-267-2300.

SYM Financial Corporation and individuals associated with our firm are prohibited from engaging in principal transactions.

## **Item 12 Brokerage Practices**

For discretionary and non-discretionary clients, SYM Financial Corporation provides clients with the choice of several Broker Dealers. All clients have the same commission schedule depending on the Broker Dealer chosen.

Brokers that we select to execute transactions may from time to time refer clients to our firm. SYM Financial Corporation will not make commitments to any broker or dealer to compensate that broker or dealer through brokerage or dealer transactions for client referrals; however, a potential conflict of interest may arise between the client's interest in obtaining best price and execution and SYM Financial Corporation' interest in receiving future referrals.

As a matter of policy and practice, SYM Financial Corporation does not generally block client trades and, therefore, we implement client transactions separately for each account. Consequently, certain client trades may be executed before others, at a different price and/or commission rate. Additionally, our clients may not receive volume discounts available to advisers who block client trades.

SYM Financial Corporation may recommend that clients establish brokerage accounts with the Schwab Institutional division of Charles Schwab & Co., Inc. ("Schwab"), a FINRA registered broker-dealer, member SIPC, to maintain custody of clients' assets and to effect trades for their accounts. Although we recommend that clients establish accounts at Schwab, it is the client's decision to custody assets with Schwab. SYM Financial Corporation is independently owned and operated and not affiliated with Schwab.

Schwab provides SYM Financial Corporation with access to its institutional trading and custody services, which are typically not available to Schwab retail investors. These services generally are available to independent investment advisers on an unsolicited basis, at no charge to them so long as a total of at least \$10 million of the adviser's clients' assets are maintained in accounts at Schwab Institutional. These services are not contingent upon our firm committing to Schwab any specific amount of business (assets in custody or trading commissions). Schwab's brokerage services include the execution of securities transactions, 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.

For our client accounts maintained in its custody, Schwab generally does not charge separately for custody services but is compensated by account holders through commissions and other transaction-related or asset-based fees for securities trades that are executed through Schwab or that settle into Schwab accounts.



Schwab Institutional also makes available to our firm other products and services that benefit SYM Financial Corporation but may not directly benefit our clients' accounts. Many of these products and services may be used to service all or some substantial number of our client accounts, including accounts not maintained at Schwab.

Schwab's products and services that assist us in managing and administering our clients' accounts include software and other technology that

- i. provide access to client account data (such as trade confirmations and account statements);
- ii. facilitate trade execution and allocate aggregated trade orders for multiple client accounts;
- iii. provide research, pricing and other market data;
- iv. facilitate payment of our fees from clients' accounts; and
- v. assist with back-office functions, recordkeeping and client reporting.

Schwab Institutional also offers other services intended to help us manage and further develop our business enterprise. These services may include:

- i. compliance, legal and business consulting;
- ii. publications and conferences on practice management and business succession; and
- iii. access to employee benefits providers, human capital consultants and insurance providers.

Schwab may make available, arrange and/or pay third-party vendors for the types of services rendered to SYM Financial Corporation. Schwab Institutional may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to our firm. Schwab Institutional may also provide other benefits such as educational events or occasional business entertainment of our personnel. In evaluating whether to recommend or require that clients custody their assets at Schwab, we may take into account the availability of some of the foregoing products and services and other arrangements as part of the total mix of factors we consider and not solely on the nature, cost or quality of custody and brokerage services provided by Schwab, which may create a potential conflict of interest.

SYM Financial Corporation has an arrangement with National Financial Services LLC, and Fidelity Brokerage Services LLC (together with all affiliates, "Fidelity") through which Fidelity provides our firm with their "platform" services. The platform services include, among others, brokerage, custodial, administrative support, record keeping and related services that are intended to support intermediaries like SYM Financial Corporation in conducting business and in serving the best interests of our clients but that may also benefit us.

Fidelity charges brokerage commissions and transaction fees for effecting certain securities transactions (i.e., transactions fees are charged for certain no-load mutual funds, commissions are charged for individual equity and debt securities transactions). Fidelity enables SYM Financial Corporation to obtain many no-load mutual funds without transaction charges and other no-load funds at nominal transaction charges. Fidelity's commission rates are generally considered discounted from customary retail commission rates. However, the commissions and transaction fees charged by Fidelity may be higher or lower than those charged by other custodians and broker-dealers. As part of the arrangement, Fidelity also makes available to our firm, at no additional charge to us, certain research and brokerage

services, including research services obtained by Fidelity directly from independent research companies, as selected by SYM Financial Corporation (within specified parameter

## **Item 13    Review of Accounts**

### **INDIVIDUAL PORTFOLIO MANAGEMENT**

**REVIEWS:** While the underlying securities within Individual Portfolio Management Services accounts are continually monitored, these accounts are reviewed at least quarterly. Accounts are reviewed in the context of each client's stated investment objectives and guidelines. More frequent reviews may be triggered by material changes in variables such as the client's individual circumstances, or the market, political or economic environment.

These accounts are reviewed by the SYM Investment Committee, as well as the Financial Advisor assigned to the particular client who is supervised by Jerald Yeager. Such reviews are also supported by SYM's Client Services Team.

**REPORTS:** In addition to the monthly statements and confirmations of transactions that clients receive from their broker-dealer, we provide quarterly reports summarizing account performance, balances and holdings.

### **WEALTH MANAGEMENT SERVICES**

**REVIEWS:** While the underlying securities within Individual Portfolio Management Services accounts are continually monitored, these accounts are reviewed quarterly. Accounts are reviewed in the context of each client's stated investment objectives and guidelines. More frequent reviews may be triggered by material changes in variables such as the client's individual circumstances, or the market, political or economic environment.

These accounts are reviewed by the SYM Investment Committee, as well as the Financial Advisor assigned to the particular client who is supervised by Jerald Yeager. Such reviews are also supported by SYM's Client Services Team.

**REPORTS:** In addition to the monthly statements and confirmations of transactions that Portfolio Management Services clients receive from their broker-dealer, SYM Financial Corporation will provide quarterly reports summarizing account performance, balances and holdings.

### **PENSION CONSULTING SERVICES**

**REVIEWS:** SYM Financial Corporation will review the client's Investment Policy Statement (IPS) whenever the client advises us of a change in circumstances regarding the needs of the plan. SYM Financial Corporation will also review the investment options of the plan according to the agreed upon time intervals established in the IPS. Such reviews will generally occur quarterly.

These accounts are reviewed by the SYM Investment Committee, as well as the Financial Advisor assigned to the particular client who is supervised by Jerald Yeager. Such reviews are also supported by SYM's Client Services Team.

**REPORTS:** SYM Financial Corporation will provide reports to Pension Consulting Services clients based on the terms set forth in the client's Investment Policy Statement (IPS).

## **FINANCIAL PLANNING SERVICES**

**REVIEWS:** While reviews may occur at different stages depending on the nature and terms of the specific engagement, typically no formal reviews will be conducted for Financial Planning clients unless otherwise contracted for.

**REPORTS:** Financial Planning clients will receive a completed financial plan. Additional reports will not typically be provided unless otherwise contracted for.

## **Item 14 Client Referrals and Other Compensation**

### **CLIENT REFERRALS**

Our firm may pay referral fees to independent persons or firms ("Solicitors") for introducing clients to us. Whenever we pay a referral fee, we require the Solicitor to provide the prospective client with a copy of this document (our *Firm Brochure*) and a separate disclosure statement that includes the following information:

- the Solicitor's name and relationship with our firm;
- the fact that the Solicitor is being paid a referral fee;
- the amount of the fee; and
- whether the fee paid to us by the client will be increased above our normal fees in order to compensate the Solicitor.

As a matter of firm practice, the advisory fees paid to us by clients referred by solicitors are not increased as a result of any referral.

It is SYM Financial Corporation's policy not to accept or allow our related persons to accept any form of compensation, including cash, sales awards or other prizes, from a non-client in conjunction with the advisory services we provide to our clients.

## **Item 15 Custody**

We previously disclosed in the "Fees and Compensation" section (Item 5) of this Brochure that our firm directly debits advisory fees from client accounts.

As part of this billing process, the client's custodian is advised of the amount of the fee to be deducted from that client's account. On at least a quarterly basis, the custodian is required to send to the client a statement showing all transactions within the account during the reporting period.

Because the custodian does not calculate the amount of the fee to be deducted, it is important for clients to carefully review their custodial statements to verify the accuracy of the calculation, among other things. Clients should contact us directly if they believe that there may be an error in their statement.

In addition to the periodic statements that clients receive directly from their custodians, we also send account statements directly to our clients on a quarterly basis. We urge our clients to carefully compare the information provided on these statements to ensure that all account transactions, holdings and values are correct and current.

Our firm does not have actual or constructive custody of client accounts.

## **Item 16 Investment Discretion**

Clients may hire us to provide discretionary asset management services, in which case we place trades in a client's account without contacting the client prior to each trade to obtain the client's permission.

Our discretionary authority includes the ability to do the following without contacting the client:

- determine the security to buy or sell; and/or
- determine the amount of the security to buy or sell

Clients give us discretionary authority when they sign a discretionary agreement with our firm, and may limit this authority by giving us written instructions. Clients may also change/amend such limitations by once again providing us with written instructions.

## **Item 17 Voting Client Securities**

As a matter of firm policy, we do not vote proxies on behalf of clients. Therefore, although our firm may provide investment advisory services relative to client investment assets, clients maintain exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the client's investment assets. Clients are responsible for instructing each custodian of the assets, to forward to the client copies of all proxies and shareholder communications relating to the client's investment assets.

We may provide clients with consulting assistance regarding proxy issues if they contact us with questions at our principal place of business.

## **Item 18 Financial Information**

Under no circumstances do we require or solicit payment of fees in excess of \$1200 per client more than six months in advance of services rendered. Therefore, we are not required to include a financial statement.

As an advisory firm that maintains discretionary authority for client accounts, we are also required to disclose any financial condition that is reasonable likely to impair our ability to meet our contractual obligations. SYM Financial Corporation has no additional financial circumstances to report.

SYM Financial Corporation has not been the subject of a bankruptcy petition at any time during the past ten years.



**Part 2B of Form ADV: *Brochure Supplement***

Bruce F. Hubbell  
801 Park Avenue  
Winona Lake, IN 46590  
(574) 267-2300

SYM Financial Corporation  
801 Park Avenue  
Winona Lake, IN 46590

03/31/2012

**This brochure supplement provides information about Bruce F. Hubbell that supplements the SYM Financial Corporation brochure. You should have received a copy of that brochure. Please contact Neil M. Donahoe if you did not receive SYM Financial Corporation's brochure or if you have any questions about the contents of this supplement.**

**Additional information about Bruce F. Hubbell is available of the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

**Item 2. Educational Background and Business Experience**

Bruce F. Hubbell, Adviser

Year of Birth: 1946

Education:

Mr. Hubbell graduated from the University of Illinois in 1968 with a Bachelor of Science in Accounting.

Business Background:

Adviser of SYM Financial Corporation, 06/2001 to present.

Partner at KPMG 1979-1998

KPMG, Accountant 1971-1978

**Item 3. Disciplinary Information**

Mr. Hubbell does not have any history of disciplinary events.

**Item 4. Other Business Activities**

Mr. Hubbell is not engaged in any other business or occupation.

**Item 5 Additional Compensation**

Mr. Hubbell does not receive any additional compensation.

**Item 6. Supervision**

Mr. Hubbell is responsible for providing investment advice offered to clients within the guidelines and regulations outlined in the firm's disclosure document. Mr. Hubbell is supervised by Jerald Yeager, Chief Executive Officer. Mr. Yeager is responsible for reviewing Mr. Hubbell's client transactions and ensuring that client objectives and mandates are being met. Mr. Hubbell's compliance responsibilities and personal securities transactions are reviewed by Neil Donahoe, the firm's Chief Compliance Officer and Chief Investment Officer. You may reach these individuals at (574) 267-2300.

**Part 2B of Form ADV: *Brochure Supplement***

Crystal L. Creekmore  
801 Park Avenue  
Winona Lake, IN 46590  
(574) 267-2300

SYM Financial Corporation  
801 Park Avenue  
Winona Lake, IN 46590

03/31/2012

**This brochure supplement provides information about Crystal L. Creekmore that supplements the SYM Financial Corporation brochure. You should have received a copy of that brochure. Please contact Neil M. Donahoe if you did not receive SYM Financial Corporation's brochure or if you have any questions about the contents of this supplement.**

**Additional information about Crystal L. Creekmore is available of the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**



**Item 2. Educational Background and Business Experience**

Crystal L. Creekmore, Vice President - Operations

Year of Birth: 1978

Education:

Ms. Creekmore graduated from Indiana University in 2000 with a Bachelor of Science degree.

Business Background:

Vice President - Operations of SYM Financial Corporation, 1/2009 to present

Service Team Manager of SYM Financial Corporation, 07/2006 to 12/2008

Financial Paraplanner/Senior Paraplanner of SYM Financial Corporation, 01/2003 to 06/2006

Client Service Representative of SYM Financial Corporation, 06/2000 to 12/2002

**Item 3. Disciplinary Information**

Ms. Creekmore does not have any history of disciplinary events.

**Item 4. Other Business Activities**

Ms. Creekmore is not engaged in any other business or occupation.

**Item 5 Additional Compensation**

Ms. Creekmore does not receive any additional compensation.

**Item 6. Supervision**

Ms. Creekmore is responsible for providing operations assistance to the firm and its clients. Ms. Creekmore is supervised by Rodney S. Coleman, President. Ms. Creekmore's compliance responsibilities and personal securities transactions are reviewed by Neil Donahoe, the firm's Chief Compliance Officer and Chief Investment Officer. You may reach these individuals at (574) 267-2300.

## **Part 2B of Form ADV: *Brochure Supplement***

Caroline F. Jagger  
801 Park Avenue  
Winona Lake, IN 46590  
(574) 267-2300

SYM Financial Corporation  
801 Park Avenue  
Winona Lake, IN 46590

03/31/201~~2~~<sup>4</sup>

**This brochure supplement provides information about Caroline F. Jagger that supplements the SYM Financial Corporation brochure. You should have received a copy of that brochure. Please contact Neil M. Donahoe if you did not receive SYM Financial Corporation's brochure or if you have any questions about the contents of this supplement.**

**Additional information about Caroline F. Jagger is available of the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

**Item 2. Educational Background and Business Experience**

Caroline F. Jagger, Retirement Plan Adviser

Year of Birth: 1945

Education:

Ms. Jagger attended Indiana University-Purdue University at Fort Wayne.

Business Background:

Retirement Plan Adviser of SYM Financial Corporation, 03/1999 to present.  
Regional Sales Representative of Lincoln Financial Group, 03/1996 to 02/1999.  
Trust Officer of Lake City Bank, 03/1993 to 03/1996.

**Item 3. Disciplinary Information**

Ms. Jagger does not have any history of disciplinary events.

**Item 4. Other Business Activities**

Ms. Jagger is not engaged in any other business or occupation.

**Item 5 Additional Compensation**

Mr. Jagger does not receive any additional compensation.

**Item 6. Supervision**

Ms. Jagger is responsible for providing retirement planning advice offered to clients within the guidelines and regulations outlined in the firm's disclosure document. Ms. Jagger is supervised by Stephen Yeager, Senior Vice President. Mr. Yeager is responsible for reviewing Ms. Jagger's client activities. Ms. Jagger's compliance responsibilities and personal securities transactions are reviewed by Neil Donahoe, the firm's Chief Compliance Officer and Chief Investment Officer. You may reach these individuals at (574) 267-2300.

**Part 2B of Form ADV: *Brochure Supplement***

George S. Wolfson  
801 Park Avenue  
Winona Lake, IN 46590  
(574) 267-2300

SYM Financial Corporation  
801 Park Avenue  
Winona Lake, IN 46590

03/31/2012

**This brochure supplement provides information about George S. Wolfson that supplements the SYM Financial Corporation brochure. You should have received a copy of that brochure. Please contact Neil M. Donahoe if you did not receive SYM Financial Corporation's brochure or if you have any questions about the contents of this supplement.**

**Additional information about George S. Wolfson is available of the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

**Item 2. Educational Background and Business Experience**

George S. Wolfson, Senior Vice President

Year of Birth: 1955

Education:

Mr. Wolfson graduated from Indiana University in 1993 with a Bachelor of Arts degree.

Business Background:

Senior Vice President of SYM Financial Corporation, 07/2000 to present.  
Vice President of Charles Schwab & Co., 1995 to 2000.

**Item 3. Disciplinary Information**

Mr. Wolfson does not have any history of disciplinary events.

**Item 4. Other Business Activities**

Mr. Wolfson is not engaged in any other business or occupation.

**Item 5 Additional Compensation**

Mr. Wolfson does not receive any additional compensation.

**Item 6. Supervision**

Mr. Wolfson is responsible for providing investment advice offered to clients within the guidelines and regulations outlined in the firm's disclosure document.. Mr. Wolfson is supervised by Rodney Coleman, President. Mr. Coleman is responsible for reviewing Mr. Wolfson's client transactions and ensuring that client objectives and mandates are being met. Mr. Wolfson's compliance responsibilities and personal securities transactions are reviewed by Neil Donahoe, the firms Chief Compliance Officer and Chief Investment Officer. You may reach these individuals at (574) 267-2300.

**Part 2B of Form ADV: *Brochure Supplement***

John F. Helfrich  
801 Park Avenue  
Winona Lake, IN 46590  
(574) 267-2300

SYM Financial Corporation  
801 Park Avenue  
Winona Lake, IN 46590

03/31/2012

**This brochure supplement provides information about John F. Helfrich that supplements the SYM Financial Corporation brochure. You should have received a copy of that brochure. Please contact Neil M. Donahoe if you did not receive SYM Financial Corporation's brochure or if you have any questions about the contents of this supplement.**

**Additional information about John F. Helfrich is available of the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

**Item 2. Educational Background and Business Experience**

John F. Helfrich, Vice President

Year of Birth: 1948

Education:

Mr. Helfrich graduated from Hanover College in 1970 with a Bachelor of Arts in Math. He earned his Certified Financial Planner (CFP®) in 1986

Business Background:

Vice President of SYM Financial Corporation, 2010 to present.  
Senior Financial Advisor of SYM Financial Advisors, 2000-2010.  
Financial Advisor of SYM Financial Advisors, 1981 – 2000.

**Item 3. Disciplinary Information**

Mr. Helfrich does not have any history of disciplinary events.

**Item 4. Other Business Activities**

Mr. Helfrich is not engaged in any other business or occupation.

**Item 5. Additional Compensation**

Mr. Helfrich does not receive any additional compensation.

**Item 6. Supervision**

Mr. Helfrich is responsible for providing investment advice offered to clients within the guidelines and regulations outlined in the firm's disclosure document. Mr. Helfrich is supervised by Rodney Coleman, President. Mr. Coleman is responsible for reviewing Mr. Helfrich's client transactions and ensuring that client objectives and mandates are being met. Mr. Helfrich's compliance responsibilities and personal securities transactions are reviewed by Neil Donahoe, the firm's Chief Compliance Officer and Chief Investment Officer. You may reach these individuals at (574) 267-2300.

## **Part 2B of Form ADV: *Brochure Supplement***

Jonathan P. Hueftle  
801 Park Avenue  
Winona Lake, IN 46590  
(574) 267-2300

SYM Financial Corporation  
801 Park Avenue  
Winona Lake, IN 46590

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**This brochure supplement provides information about Jonathan P. Hueftle that supplements the SYM Financial Corporation brochure. You should have received a copy of that brochure. Please contact Neil M. Donahoe if you did not receive SYM Financial Corporation's brochure or if you have any questions about the contents of this supplement.**

**Additional information about Jonathan P. Hueftle is available of the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**



**Item 2. Educational Background and Business Experience**

Jonathan P. Hueftle, Financial Advisor

Year of Birth: 1967

Education:

Mr. Hueftle graduated from Indiana University in 1989 with a Bachelor of Science in Public Affairs and Finance.

Business Background:

Financial Advisor of SYM Financial Corporation, 08/2000 to present.

**Item 3. Disciplinary Information**

Mr. Hueftle does not have any history of disciplinary events.

**Item 4. Other Business Activities**

Mr. Hueftle is not engaged in any other business or occupation.

**Item 5 Additional Compensation**

Mr. Hueftle does not receive any additional compensation.

**Item 6. Supervision**

Mr. Hueftle is responsible for providing investment advice offered to clients within the guidelines and regulations outlined in the firm's disclosure document. Mr. Hueftle is supervised by Jerald Yeager, Chief Executive Officer. Mr. Yeager is responsible for reviewing Mr. Hueftle's client transactions and ensuring that client objectives and mandates are being met. Mr. Hueftle's compliance responsibilities and personal securities transactions are reviewed by Neil Donahoe, the firm's Chief Compliance Officer and Chief Investment Officer. You may reach these individuals at (574) 267-2300.

**Part 2B of Form ADV: *Brochure Supplement***

Jerald W. Yeager  
801 Park Avenue  
Winona Lake, IN 46590  
(574) 267-2300

SYM Financial Corporation  
801 Park Avenue  
Winona Lake, IN 46590

03/31/2012

**This brochure supplement provides information about Jerald W. Yeager that supplements the SYM Financial Corporation brochure. You should have received a copy of that brochure. Please contact Neil M. Donahoe if you did not receive SYM Financial Corporation's brochure or if you have any questions about the contents of this supplement.**

**Additional information about Jerald W. Yeager is available of the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

**Item 2. Educational Background and Business Experience**

Jerald W. Yeager, CEO

Year of Birth: 1964

Education:

Mr. Yeager graduated from Taylor University in 1987 with a Bachelor of Science in Business Systems.

He graduated from Indiana University School of Law in 1990 with a Juris Doctorate.

Business Background:

SYM Financial Corporation:

CEO of SYM Financial Corporation, 5/2003 to present.

CCO of SYM Financial Advisors, 2003-2005.

Vice President of Financial Services, 1/1997 to 3/2003

Partner, Yeager Law Office, 4/1993 to 1/1997

Associate Attorney, Refior Law Office, 6/1990 to 4/1993

**Item 3. Disciplinary Information**

Mr. Yeager does not have any history of disciplinary events.

**Item 4. Other Business Activities**

Mr. Yeager is not engaged in any other business or occupation.

**Item 5 Additional Compensation**

Mr. Yeager does not receive any additional compensation.

**Item 6. Supervision**

As CEO of SYM Financial Corporation, Mr. Yeager is responsible for the supervision of the firm's employees and the investment advice offered to clients. While Mr. Yeager is ultimately responsible for supervision of all employees of the firm, SYM Financial Corporation employs an advisory staff who are responsible for direct contact with clients and discretion over the implementation of investment recommendations for clients. SYM Financial Corporation also employs Neil Donahoe as Chief Compliance Officer who, in addition to Mr. Yeager is responsible for maintaining a compliance program and compliance oversight for all employees. Mr. Donahoe also reviews Mr. Yeager's personal securities transactions for any irregularities.

**Part 2B of Form ADV: *Brochure Supplement***

Mary P. Latowski  
801 Park Avenue  
Winona Lake, IN 46590  
(574) 267-2300

SYM Financial Corporation  
801 Park Avenue  
Winona Lake, IN 46590

03/01/2012

**This brochure supplement provides information about Mary P. Latowski that supplements the SYM Financial Corporation brochure. You should have received a copy of that brochure. Please contact Neil M. Donahoe if you did not receive SYM Financial Corporation's brochure or if you have any questions about the contents of this supplement.**

**Additional information about Mary P. Latowski is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

**Item 2. Educational Background and Business Experience**

Mary P. Latowski, Advisor

Year of Birth: 1956

Education:

Ms. Latowski graduated from Holy Cross College in 1977 with an Associate of Arts degree. She graduated from Indiana University in 1991 with a Paralegal degree.

Business Background:

Advisor of SYM Financial Corporation, 2000 to present.

**Item 3. Disciplinary Information**

Ms. Latowski does not have any history of disciplinary events.

**Item 4. Other Business Activities**

Ms. Latowski is not engaged in any other business or occupation.

**Item 5. Additional Compensation**

Ms. Latowski does not receive any additional compensation.

**Item 6. Supervision**

Ms. Latowski is responsible for providing investment advice offered to clients within the guidelines and regulations outlined in the firm's disclosure document. Ms. Latowski is supervised by George Wolfson, Senior Vice President. Mr. Wolfson is responsible for reviewing Ms. Latowski's client transactions and ensuring that client objectives and mandates are being met. Ms. Latowski's compliance responsibilities and personal securities transactions are reviewed by Neil Donahoe, the firm's Chief Compliance Officer and Chief Investment Officer. You may reach these individuals at (574) 267-2300.

**Part 2B of Form ADV: *Brochure Supplement***

Neil M. Donahoe  
801 Park Avenue  
Winona Lake, IN 46590  
(574) 267-2300

SYM Financial Corporation  
801 Park Avenue  
Winona Lake, IN 46590

03/31/2012

**This brochure supplement provides information about Neil M. Donahoe that supplements the SYM Financial Corporation brochure. You should have received a copy of that brochure. Please contact Neil M. Donahoe if you did not receive SYM Financial Corporation's brochure or if you have any questions about the contents of this supplement.**

**Additional information about Neil M. Donahoe is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

**Item 2. Educational Background and Business Experience**

Neil M. Donahoe, Senior Vice President, CIO, CCO

Year of Birth: 1959

Education:

Mr. Donahoe attended Trinity University, 1977 – 1979.  
He graduated from Purdue University in 1981 with a Bachelor of Science in Management.  
He earned his Certified Financial Planner (CFP®) designation in 1986  
He received his Master of Science in Financial Planning in 1996 from the College of Financial Planning.

Business Background:

Senior Vice President, CIO, of SYM Financial Corporation, 1987 to present, CCO since March 2005  
Trust Investment Analyst of First National Bank of Warsaw, 1983 to 1987.

**Item 3. Disciplinary Information**

Mr. Donahoe does not have any history of disciplinary events.

**Item 4. Other Business Activities**

Mr. Donahoe is not engaged in any other business or occupation.

**Item 5 Additional Compensation**

Mr. Donahoe does not receive any additional compensation.

**Item 6. Supervision**

Mr. Donahoe is supervised by Rodney Coleman, President. As the Chief Investment Officer, he oversees all material investment policy changes, and conducts periodic testing to ensure that client objectives and mandates are being met. As the firm's Chief Compliance Officer he is responsible for maintaining a strong compliance program including testing and monitoring of all policy and procedures. Mr. Donahoe's own compliance responsibilities and personal securities transactions are reviewed by Mr. Coleman.

## **Part 2B of Form ADV: *Brochure Supplement***

Rodney S. Coleman  
801 Park Avenue  
Winona Lake, IN 46590  
(574) 267-2300

SYM Financial Corporation  
801 Park Avenue  
Winona Lake, IN 46590

03/31/201~~2~~<sup>4</sup>

**This brochure supplement provides information about Rodney S. Coleman that supplements the SYM Financial Corporation brochure. You should have received a copy of that brochure. Please contact Neil M. Donahoe if you did not receive SYM Financial Corporation's brochure or if you have any questions about the contents of this supplement.**

**Additional information about Rodney S. Coleman is available of the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**



**Item 2. Educational Background and Business Experience**

Rodney S. Coleman, President

Year of Birth: 1969

Education:

Mr. Coleman graduated from the United States Naval Academy in 1991 with a Bachelor of Science in Economics.

He earned the Certified Financial Planner designation (CFP®) in 2003.

He graduated from the University of Chicago, Booth School of Business in 2004 with a Masters in Business Administration (MBA).

Business Background:

President of SYM Financial Corporation 2010 to Present

Senior Vice President of Financial Advisory Services of SYM Financial Corporation, 2002 to 2010. Managing Financial Advisor with SYM Financial Advisors 2001-2002. Financial Advisor with SYM Financial Advisors 2000-2001.

United States Navy, 1987 – 2000.

**Item 3. Disciplinary Information**

Mr. Coleman does not have any history of disciplinary events.

**Item 4. Other Business Activities**

Mr. Coleman is not engaged in any other business or occupation.

**Item 5. Additional Compensation**

Mr. Coleman does not receive any additional compensation.

**Item 6. Supervision**

Mr. Coleman is supervised by Jerald Yeager, Chief Executive Officer, and he is responsible for the supervision, formulation and monitoring of investment advice offered to clients by the firm's advisory representatives. Mr. Coleman's compliance responsibilities and personal securities transactions are reviewed by Neil Donahoe, the firm's Chief Compliance Officer and Chief Investment Officer. You may reach these individuals at (574) 267-2300.

**Part 2B of Form ADV: *Brochure Supplement***

R. Jay Dunnuck  
801 Park Avenue  
Winona Lake, IN 46590  
(574) 267-2300

SYM Financial Corporation  
801 Park Avenue  
Winona Lake, IN 46590

03/31/2012

**This brochure supplement provides information about R. Jay Dunnuck that supplements the SYM Financial Corporation brochure. You should have received a copy of that brochure. Please contact Neil M. Donahoe if you did not receive SYM Financial Corporation's brochure or if you have any questions about the contents of this supplement.**

**Additional information about R. Jay Dunnuck is available of the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

**Item 2. Educational Background and Business Experience**

R. Jay Dunnuck, Financial Advisor

Year of Birth: 1976

Education:

Mr. Dunnuck graduated from Purdue University in 1999 with a Bachelor of Science in Business Management and Finance

He also received a Master of Science in Personal Financial Planning in 2008 from the College of Financial Planning.

He received his Certified Financial Planner (CFP®) in 2009 .

Business Background:

Financial Advisor of SYM Financial Corporation, 08/2004 to present.

Commercial Loan Officer of Lake City Bank, 12/2002 to 08/2004.

Financial ParaPlanner of SYM Financial Advisors, 09/1999 to 12/2002.

**Item 3. Disciplinary Information**

Mr. Dunnuck does not have any history of disciplinary events.

**Item 4. Other Business Activities**

Mr. Dunnuck is not engaged in any other business or occupation.

**Item 5. Additional Compensation**

Mr. Dunnuck does not receive any additional compensation.

**Item 6. Supervision**

Mr. Dunnuck is responsible for providing investment advice offered to clients within the guidelines and regulations outlined in the firm's disclosure document. Mr. Dunnuck is supervised by Rodney Coleman, President. Mr. Coleman is responsible for reviewing Mr. Dunnuck's client transactions and ensuring that client objectives and mandates are being met. Mr. Dunnuck's personal securities transactions are reviewed by Neil Donahoe, the firm's Chief Compliance Officer and Chief Investment Officer. You may reach these individuals at (574) 267-2300.

**Part 2B of Form ADV: *Brochure Supplement***

Robert L. Puz  
801 Park Avenue  
Winona Lake, IN 46590  
(574) 267-2300

SYM Financial Corporation  
801 Park Avenue  
Winona Lake, IN 46590

03/31/201~~2~~<sup>4</sup>

**This brochure supplement provides information about Robert L. Puz that supplements the SYM Financial Corporation brochure. You should have received a copy of that brochure. Please contact Neil M. Donahoe if you did not receive SYM Financial Corporation's brochure or if you have any questions about the contents of this supplement.**

**Additional information about Robert L. Puz is available of the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

**Item 2. Educational Background and Business Experience**

Robert L. Puz, Advisor

Year of Birth: 1971

Education:

Mr. Puz graduated from Northern Michigan University in 1993 with a Bachelor degree.

Business Background:

Advisor of SYM Financial Corporation, 2008 to present.

Registered Representative of Citizen Bank Wealth Management, 2003 – 2008.

Registered Representative of National City Private Client Group, 1999 – 2003.

**Item 3. Disciplinary Information**

Mr. Puz does not have any history of disciplinary events.

**Item 4. Other Business Activities**

Mr. Puz is not engaged in any other business or occupation.

**Item 5. Additional Compensation**

Mr. Puz does not receive any additional compensation.

**Item 6. Supervision**

Mr. Puz is responsible for providing investment advice offered to clients within the guidelines and regulations outlined in the firm's disclosure document. Mr. Puz is supervised by Rodney Coleman, President. Mr. Coleman is responsible for reviewing Mr. Puz's client transactions and ensuring that client objectives and mandates are being met. Mr. Puz's personal securities transactions are reviewed by Neil Donahoe, the firm's Chief Compliance Officer and Chief Investment Officer. You may reach these individuals at (574) 267-2300.

**Part 2B of Form ADV: *Brochure Supplement***

Robert S. Whicker  
801 Park Avenue  
Winona Lake, IN 46590  
(574) 267-2300

SYM Financial Corporation  
801 Park Avenue  
Winona Lake, IN 46590

03/31/2012

**This brochure supplement provides information about Robert S. Whicker that supplements the SYM Financial Corporation brochure. You should have received a copy of that brochure. Please contact Neil M. Donahoe if you did not receive SYM Financial Corporation's brochure or if you have any questions about the contents of this supplement.**

**Additional information about Robert S. Whicker is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

**Item 2. Educational Background and Business Experience**

Robert S. Whicker, Vice President

Year of Birth: 1969

Education:

Mr. Whicker graduated from Ball State University in 1992 with a Bachelor of Science. He graduated from the College for Financial Planning in 2006 with a Masters in Financial Analysis.

He earned his Certified Financial Planner (CFP®) designation in 2010

Business Background:

Vice President of SYM Financial Corporation, 10/2007 to present.

Director of Asset Management of Galecki Financial Management, 02/1999 – 09/2007.

**Item 3. Disciplinary Information**

Mr. Whicker does not have any history of disciplinary events.

**Item 4. Other Business Activities**

Mr. Whicker is not engaged in any other business or occupation.

**Item 5. Additional Compensation**

Mr. Whicker does not receive any additional compensation.

**Item 6. Supervision**

Mr. Whicker is responsible for providing investment advice offered to clients within the guidelines and regulations outlined in the firm's disclosure document. Mr. Whicker is supervised by Jerald Yeager, Chief Executive Officer. Mr. Yeager is responsible for reviewing Mr. Whicker's client transactions and ensuring that client objectives and mandates are being met. Mr. Whicker's personal securities transactions are reviewed by Neil Donahoe, the firm's Chief Compliance Officer and Chief Investment Officer. You may reach these individuals at (574) 267-2300.

**Part 2B of Form ADV: *Brochure Supplement***

Stephen C. Yeager  
801 Park Avenue  
Winona Lake, IN 46590  
(574) 267-2300

SYM Financial Corporation  
801 Park Avenue  
Winona Lake, IN 46590

03/31/2012

**This brochure supplement provides information about Stephen C. Yeager that supplements the SYM Financial Corporation brochure. You should have received a copy of that brochure. Please contact Neil M. Donahoe if you did not receive SYM Financial Corporation's brochure or if you have any questions about the contents of this supplement.**

**Additional information about Stephen C. Yeager is available of the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**



**Item 2. Educational Background and Business Experience**

Stephen C. Yeager, Senior Vice President

Year of Birth: 1967

Education:

Mr. Yeager graduated from the United States Naval Academy in 1990 with a Bachelor of Science in Economics.

Mr. Yeager graduated from The College of William and Mary in 2000 with a MBA.

Business Background:

Vice President of SYM Financial Corporation, 10/2000 to present.

Lieutenant Commander, Pilot of the United States Navy, 05/1990 – 09/2000.

**Item 3. Disciplinary Information**

Mr. Yeager does not have any history of disciplinary events.

**Item 4. Other Business Activities**

Mr. Yeager is not engaged in any other business or occupation.

**Item 5. Additional Compensation**

Mr. Yeager does not receive any additional compensation.

**Item 6. Supervision**

Mr. Yeager is responsible for providing investment advice offered to clients within the guidelines and regulations outlined in the firm's disclosure document. Mr. Yeager is supervised by Rodney Coleman, President. Mr. Coleman is responsible for reviewing Mr. Yeager's client transactions and ensuring that client objectives and mandates are being met. Mr. Yeager's personal securities transactions are reviewed by Neil Donahoe, the firm's Chief Compliance Officer and Chief Investment Officer. You may reach these individuals at (574) 267-2300.

## Part 2B of Form ADV: *Brochure Supplement*

Thomas R. Ackmann

Jonathan P. Hueftle

801 Park Avenue  
Winona Lake, IN 46590  
(574) 267-2300

SYM Financial Corporation  
801 Park Avenue  
Winona Lake, IN 46590

03/31/201~~2~~<sup>4</sup>

This brochure supplement provides information about Thomas R. Ackmann~~Jonathan P. Hueftle~~ that supplements the SYM Financial Corporation brochure. You should have received a copy of that brochure. Please contact Neil M. Donahoe if you did not receive SYM Financial Corporation's brochure or if you have any questions about the contents of this supplement.

Additional information about Thomas R. Ackmann~~Jonathan P. Hueftle~~ is available of the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**Item 2. Educational Background and Business Experience**

~~Thomas R. Ackmann~~Jonathan P. Hueftle, Financial Advisor

Year of Birth: 1967

Education:

Mr. ~~Ackmann~~Hueftle graduated from ~~Concordia College, River Forest, IL~~ Indiana University in 1989 with a Bachelor of ~~Arts, Cum Laude~~Science in Public Affairs and Finance.

Business Background:

Financial Advisor of SYM Financial Corporation, ~~July 2011~~08/2000 to present.  
Vice President of Baden Retirement Plan Services November 1998 to July 2011

**Item 3. Disciplinary Information**

Mr. ~~Ackmann~~Hueftle does not have any history of disciplinary events.

**Item 4. Other Business Activities**

Mr. ~~Ackmann~~Hueftle is not engaged in any other business or occupation.

**Item 5 Additional Compensation**

Mr. ~~Ackmann~~Hueftle does not receive any additional compensation.

**Item 6. Supervision**

Mr. ~~Ackmann~~Hueftle is responsible for providing investment advice offered to clients within the guidelines and regulations outlined in the firm's disclosure document. Mr. ~~Ackmann~~Hueftle is supervised by Jerald Yeager, ~~Chief Executive Officer~~. Mr. Yeager is responsible for reviewing Mr. ~~Ackmann~~Hueftle's client transactions and ensuring that client objectives and mandates are being met. Mr. ~~Ackmann~~Hueftle's compliance responsibilities and personal securities transactions are reviewed by Neil Donahoe, the firm's Chief Compliance Officer and Chief Investment Officer. You may reach these individuals at (574) 267-2300.