

Item 1 – Cover Page

LionsBridge Asset Management, LLC

A Florida limited liability company
d/b/a LionsBridge Wealth Management

4230 Pablo Professional Court, Suite 202
Jacksonville, FL 32224

904.562.5190

www.lionsbridgecapital.com

December 31, 2011

This Brochure provides information about the qualifications and business practices of [LionsBridge Asset Management, LLC \(“LBAM”\)](#). If you have any questions about the contents of this Brochure, please contact us at [904.562.5190](tel:904.562.5190) or cham@lionsbridgecapital.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.

[LBAM](#) is a registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser.

Additional information about [LBAM](#) also is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 – Material Changes

On July 28, 2010, the United State Securities and Exchange Commission published “Amendments to Form ADV” which amends the disclosure document that we provide to clients as required by SEC Rules. This Brochure dated **December 31, 2011** is a new document prepared according to the SEC’s new requirements and rules. As such, this Document is materially different in structure and requires certain new information that our previous brochure did not require.

In the future, this Item will discuss only specific material changes that are made to the Brochure and provide clients with a summary of such changes. We will also reference the date of our last annual update of our brochure.

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

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

Currently, our Brochure may be requested by contacting **Carolyn Ham, Chief Operating Officer** at **904.562.5194** or **cham@lionsbridgecapital.com**. Our Brochure is also available on our web site www.lionsbridgecapital.com, also free of charge.

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

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Item 4 – Advisory Business

LBAM was established in December, 2008 as a Registered Investment Advisor which provides fee-only investment management services to individuals, businesses, trusts and not-for-profit organizations. **LBAM** is a wholly owned subsidiary of LionsBridge Capital Holdings, LLC, a Florida limited liability company. **LBAM** follows a disciplined process to understand our clients' personal and family financial goals. We analyze the expected time horizon for the expected use of the funds, liquidity and income needs, and any other unique objectives or restrictions which we need to understand before we start investing on behalf of our clients. Once we have a better understanding of our clients specific requirements, we will suggest a specific strategic asset allocation model that reflects their long term objectives and risk tolerance. However, clients can place restrictions on investing in certain securities or class of securities. We will then draft an investment policy which will serve as the blueprint for building and overseeing the investment portfolio. Approximately \$60,587,800 of our assets are managed on a discretionary basis and \$4,442,900 are managed on a non-discretionary basis.

Item 5 – Fees and Compensation

All fees are subject to negotiation.

The specific manner in which fees are charged by **LBAM** is established in a client's written agreement with **LBAM**. **LBAM** will generally bill its fees on a monthly basis, in arrears, based on a percentage of assets under management. Fees are directly debited from client accounts. Management fees shall be prorated for each capital contribution and withdrawal made during the applicable calendar month. Accounts initiated or terminated during a calendar month will be charged a prorated fee. Upon termination of any account, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable. The client has the right to terminate an agreement without penalty within five business days after entering into the agreement.

LBAM's fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, third party investment and other third parties such as fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees

and commissions are exclusive of and in addition to LBAM's fee, and LBAM shall not receive any portion of these commissions, fees, and costs.

Item 12 further describes the factors that LBAM considers in selecting or recommending broker-dealers for *client* transactions and determining the reasonableness of their compensation (*e.g.*, commissions).

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

LBAM does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client). All fees charged by LBAM are based upon the client's assets under management.

Item 7 – Types of Clients

LBAM provides portfolio management services to individuals, high net worth individuals, charitable institutions, foundations, endowments and trust programs.

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

In our Core Plus approach we develop a strategic asset allocation with each of our clients individually to determine the best mix of stocks to bonds that meets their long term return requirements, balanced with their risk tolerances. We spend a good deal of time talking about the potential for risk of loss in a portfolio and how we are able to mitigate, but not eliminate, this risk through asset allocation and risk management decisions in the equity portfolio. The equity portion of our Core Plus portfolios utilize two complimentary approaches. The first is our core equity approach which determines what part of the economic cycle we are in, and based on these determinations achieves what we feel is the best mix between value, growth and quality parameters in companies we select. We then use this quantitative approach to then look qualitatively at companies to determine if they are good candidate businesses to invest in. The second approach is our tactical strategy which utilizes a trend following approach to Asset Class Rotation to determine the best asset class to invest in based on recent trends based on our own proprietary work. This tactical approach also looks at the shorter term oscillations in the market to determine what equity exposure – Long or Short - is best based on our own proprietary mean reversion work. The mix between the Asset Class Rotation and Long / Short studies is largely outweighed to Asset Class Rotation, but may change based on volatility. Our Fixed Income approach is top down in nature, stressing the need for quality in the Fixed Income portion of the account so that it may be the best diversifier for equity risk. Average

maturity and quality is based on an objective assessment on the economic cycle and its implications for interest rates.

The material risks involved in our approach is market risk, as our portfolios are geared toward the strategic asset allocation of a client. Higher equity allocations will involve greater chance of loss in order to achieve higher long term returns. Our approach is active in nature in an effort to mitigate market risk. As such, turnover will be higher than in a passively managed approach, which may affect taxes paid.

Securities utilized are standard equity securities, Exchange Traded Funds, and bonds. The risks involved are the standard risk that most investors take, risk of loss.

Investing in securities involves risk of loss that clients should be prepared to bear.

Item 9 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of **LBAM** or the integrity of **LBAM**'s management. Neither **LBAM** nor any registered investment advisors that work for **LBAM** have any legal or disciplinary history that would be material to a client's evaluation of **LBAM** or its management.

Item 10 – Other Financial Industry Activities and Affiliations

LBAM does not have any management persons or related persons that are actively engaged in a business other than giving investment advice, except as provided below. **LBAM** does not sell other products besides investment advice to clients. As stated above, **LBAM** is a wholly owned subsidiary of LionsBridge Capital Holdings, LLC. LionsBridge Capital Holdings, LLC is also the holding company of LionsBridge Securities, LLC, LionsBridge Insurance, LLC, LionsBridge Capital, LLC and LionsBridge Advisors, LLC (the "LionsBridge Affiliates"). LionsBridge Securities, LLC is an investment banking and advisory firm, and Richard Zanghetti who works with LionsBridge Securities, LLC is also a registered representative of Growth Capital Services, Inc., which is a registered broker-dealer (and a member of FINRA and SIPC). Richard Zanghetti serves as Managing Director for LionsBridge Securities and devotes approximately 25% of his time to this entity.

LionsBridge Insurance, LLC, is a Florida licensed insurance broker, and Richard Zanghetti is the qualifying insurance broker of this entity. LionsBridge Capital, LLC, is a Florida licensed real estate broker, which was formed for the purpose of participating in investment banking related business which requires a Florida real estate broker license (such as transactions structured as asset rather than stock sales). LionsBridge Advisors, LLC is a business consulting company that was formed to provide strategic planning, financial analysis, and other business consulting services primarily to business and corporate clientele. There may be situations where a clientele of **LBAM** separately

engage one of the LionsBridge Affiliates to assist on a particular transaction, or to provide other services. Any transaction involving an LBAM client and any of the LionsBridge Affiliates may involve unique considerations, such as addressing any conflicts of interest that may be specific to the situation, and each LBAM client that separately engages any of the LionsBridge Affiliates will be provided with a written disclosure of any conflict of interest that may be present in order to ensure that all parties have a clear understanding of any factors or concerns that may be important.

Rick Reznicek, Thomas J. Fraser, Jr., Brett Hastings, Christopher White and Robert Shaffer, who are all partners of Reznicek, Fraser, White & Shaffer, P.A. ("RFWS"), have a material ownership interest in LBAM through their ownership of LionsBridge Capital Holdings, LLC. As required by Florida Rule of Professional Conduct 4-1.8(a), the clients of LBAM are notified: (i) that the shareholders of RFWS have an ownership interest in the LBAM; and (ii) that the clients of LBAM that are also clients of RFWS will be requested to agree, in writing, that the terms of each client's engagement of the LBAM was fair and reasonable to the particular client, that RFWS' business relationship with the client and the company was fully disclosed and transmitted in writing to the client, that the client has been advised of the desirability of seeking the advice of independent counsel, that the client has been given a reasonable opportunity to seek the advice of independent counsel regarding engaging the LBAM to render any services, and that the client is providing their informed consent to the essential terms of the business relationship with the LBAM and RFWS' shareholder's role as direct owners of a material interest in the Company, and the clients will acknowledge that RFWS is not representing any client with respect to their business relationship with LBAM.

Item 11 – Code of Ethics, Participation or Interests in Client Transactions and Personal Trading

LBAM has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of circulating unfounded rumors, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at LBAM must acknowledge the terms of the Code of Ethics annually, or as amended.

LBAM anticipates that, in appropriate circumstances, consistent with clients' investment objectives, it will cause accounts over which LBAM has management authority to effect, and will recommend to investment advisory clients or prospective clients, the purchase or sale of securities in which LBAM, its affiliates and/or clients, directly or indirectly, have a position of interest. LBAM's employees and persons associated with LBAM are required to follow LBAM's Code of Ethics. Subject to satisfying this policy and applicable laws, officers,

directors and employees of LBAM and its affiliates may trade for their own accounts in securities which are recommended to and/or purchased for LBAM's clients. The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of LBAM will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code certain classes of securities have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of LBAM's clients. In addition, the Code requires pre-clearance of many transactions, and restricts trading in close proximity to client trading activity. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee. Employee trading is continually monitored under the Code of Ethics, and to reasonably prevent conflicts of interest between LBAM and its clients.

Certain affiliated accounts may trade in the same securities with client accounts on an aggregated basis when consistent with LBAM's obligation of best execution. In such circumstances, the affiliated and client accounts will share commission costs equally and receive securities at a total average price. LBAM will retain records of the trade order (specifying each participating account) and its allocation, which will be completed prior to the entry of the aggregated order. Completed orders will be allocated as specified in the initial trade order. Partially filled orders will be allocated on a pro rata basis. Any exceptions will be explained on the Order.

LBAM's clients or prospective clients may request a copy of the firm's Code of Ethics by contacting Carolyn Ham at cham@lionsbridgecapital.com.

It is LBAM's policy that the firm will not affect any principal or agency cross securities transactions for client accounts. LBAM will also not cross trades between client accounts. Principal transactions are generally defined as transactions where an adviser, acting as principal for its own account or the account of an affiliated broker-dealer, buys from or sells any security to any advisory client. A principal transaction may also be deemed to have occurred if a security is crossed between an affiliated hedge fund and another client account. An agency cross transaction is defined as a transaction where a person acts as an investment adviser in relation to a transaction in which the investment adviser, or any person controlled by or under common control with the investment adviser, acts as broker for both the advisory client and for another person on the other side of the transaction.

Agency cross transactions may arise where an adviser is dually registered as a broker-dealer or has an affiliated broker-dealer.

Item 12 – Brokerage Practices

LBAM exclusively uses Bank of New York/Pershing, LLC for the custody, administration and execution of our client transactions. We selected our custodian after an extensive due diligence process of other custodians, their services and fees, as well as safety, transparency and reputation of the custodian. Clients understand that the choice of custodian is made exclusively by LBAM on their behalf. We do not receive client referrals from the custodian that we select. Not all advisors require their clients to direct brokerage.

LBAM does not participate in any soft-dollar arrangements with our custodian or any other third party.

Item 13 – Review of Accounts

LBAM monitors and adjusts the asset allocations of our clients on a regular basis as deemed necessary by our investment committee to ensure risk tolerance's are matched with return expectations. **LBAM** meets with their clients either quarterly, semi-annually or annually, depending on the clients preference, to ensure that their financial condition will matches the objectives of the asset allocation.

Accounts are monitored on a daily basis in order to ensure they are within the required tolerances of our models. **LBAM** strives to achieve the best risk and tax efficient returns in our models. Purchase and sale notifications are delivered to clients via email within 1 day of trading. In addition, our custodian provides monthly holdings and transaction statements.

Item 14 – Client Referrals and Other Compensation

LBAM may enter into an arrangement with a solicitor who will assist LBAM in establishing new client relationships. The solicitor will not be an employee of LBAM and may, from time to time, refer clients to LBAM who are suitable and appropriate for the investment advisory services provided by LBAM. The solicitor will perform their responsibilities under a signed agreement in accordance with the instructions of LBAM and the Investment Advisors Act and all corresponding rules thereunder, including rule 206(4)-3.

Item 15 – Custody

Clients should receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains client's investment assets. LBAM urges you to carefully review such statements and compare such official custodial records to the account statements that we may provide to you. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Item 16 – Investment Discretion

LBAM receives discretionary authority from the client at the outset of an advisory relationship to select the identity and amount of securities to be bought or sold. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account.

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

Investment guidelines and restrictions must be provided to LBAM in writing.

Item 17 – Voting Client Securities

Clients may obtain a copy of LBAM's complete proxy voting policies and procedures upon request. Clients may also obtain information from LBAM about how LBAM voted any proxies on behalf of their account(s). Clients are asked to acknowledge our voting policy when signing our Discretionary Asset Management Agreement.

Item 18 – Financial Information

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about LBAM's financial condition. LBAM has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.

Item 19 – Requirements for State-Registered Advisers

All requirements have been addressed in other parts of our ADV filing.

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Brad Ridinger

LionsBridge Asset Management, LLC

4230 Pablo Professional Court, Suite 202

Jacksonville, FL 32224

904.562.5190

December 31, 2011

This Brochure Supplement provides information about Brad Ridinger that supplements the LionsBridge Asset Management, LLC Brochure. You should have received a copy of that Brochure. Please contact Carolyn Ham if you did not receive LionsBridge Asset Management, LLC's Brochure or if you have any questions about the contents of this supplement.

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

Item 2- Educational Background and Business Experience

Brad Ridinger
Year of Birth: 1964

Brad has 23 years of investment and portfolio management experience. Before joining LionsBridge, Brad was a Portfolio Manager at Morgan Stanley for 8 years. He helped manage over \$300 million in equities, fixed-income and alternative investments for a Private Wealth Management Team. Prior to that he was a Portfolio Manager for 16 years at First Union (now Wachovia) where he managed over \$2.5 billion in equities and fixed-income securities for institutional clients and mutual funds.

At LionsBridge, Brad's responsibilities include formulating strategic and tactical equity, fixed income and alternative investment strategies for the firm's clients. He is also responsible for trading and monitoring client assets to ensure conformity with each client's investment policy.

Brad earned the Chartered Financial Analyst designation in 1990. He is a member of the CFA Society of Jacksonville and the CFA Institute.

Education: B.S.B.A in Finance from the University of Florida, (Gainesville FL) 1987

Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

Item 4- Other Business Activities

LBAM is a wholly owned subsidiary of LionsBridge Capital Holdings, LLC. LionsBridge Capital Holdings, LLC is also the holding company of LionsBridge Securities, LLC, LionsBridge Insurance, LLC, LionsBridge Capital, LLC and LionsBridge Advisors, LLC (the "LionsBridge Affiliates"). LionsBridge Securities, LLC is an investment banking and advisory firm, and the individuals that work with LionsBridge Securities, LLC are also registered representatives of Growth Capital Services, Inc., which is a registered broker-dealer (and a member of FINRA and SIPC). Brad devotes about 5% of his time to this entity.

Item 5- Additional Compensation

Brad doesn't receive any third party compensation for advisory services.

Item 6 - Supervision

We meet on a regular basis, not less than once a month, to review client objectives and asset allocations. We also review material correspondence with clients, client logs and trading activity.

Item 1- Cover Page

Carolyn Ham

LionsBridge Asset Management, LLC

4230 Pablo Professional Court, Suite 202

Jacksonville, FL 32224

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

Item 2- Educational Background and Business Experience

Carolyn Ham

Year of Birth: 1966

Carolyn has 24 years of Operational and Administrative management experience. She started her career with Thompson McKinnon in 1985 in their operations/compliance program where she remained until she moved to EF Hutton. Carolyn joined Kidder Peabody in 1989 where she worked as an operations administrator.

In 1995, Carolyn moved to Morgan Stanley as a Complex Operations Manager. In 2003, Carolyn became the Administrator of a large Private Wealth Management Group, at Morgan Stanley, where she was responsible for all operational and administrative functions. In addition to these duties she also assisted the portfolio managers with the day to day monitoring and trading of client accounts.

At LionsBridge, Carolyn is responsible for Compliance and Operations as well as working with the portfolio managers in the daily servicing, trading and administration of client relationships.

Item 3- Disciplinary Information

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Item 4- Other Business Activities

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Item 5- Additional Compensation

Carolyn doesn’t receive any third party compensation for advisory services.

Item 6 - Supervision

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Richard Zanghetti

LionsBridge Asset Management, LLC

4230 Pablo Professional Court, Suite 202

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

Item 2- Educational Background and Business Experience

Richard Zanghetti
Year of Birth: 1957

Richard has 31 years of financial and investment experience in analyzing, structuring, trading and monitoring investment products across diverse financial markets. He brings significant expertise in creating innovative financing and investment strategies for high net-worth families, individuals, entrepreneurs and businesses with diverse objectives.

Richard began his career in 1981 as a Trader with Midland Bank PLC in New York City. After several years, and relocation to London, he was promoted to one of the Chief Trader's in Midland's Capital Markets Group. In 1987, Richard accepted a position at Morgan Stanley as a Senior Trader where he remained until he left to manage a Proprietary Trading Group at Salomon Brothers. He joined Lehman Brothers in 1991 as a Senior Vice President and directed a Global Risk Management Group in New York, London and Tokyo.

Richard relocated to Florida in 1999, and returned to Morgan Stanley, where he was a Senior Partner in a successful Private Wealth Management Group with over \$300 million

under management. In addition to providing traditional wealth management services, Richard was actively involved in estate and philanthropic advisory planning for clients.

Richard's responsibilities at LionsBridge include formulating Tactical Asset Allocation and Investment Strategies, identifying Alternative Investment opportunities, Estate and Philanthropic Planning and facilitating new business relationships.

Education: The George Washington University (Washington, D.C.) B.A. 1981

Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

Item 4- Other Business Activities

LBAM is a wholly owned subsidiary of LionsBridge Capital Holdings, LLC. LionsBridge Capital Holdings, LLC is also the holding company of LionsBridge Securities, LLC, LionsBridge Insurance, LLC, LionsBridge Capital, LLC and LionsBridge Advisors, LLC (the "LionsBridge Affiliates").

LionsBridge Securities, LLC is an investment banking and advisory firm, and the individuals that work with LionsBridge Securities, LLC are also registered representatives of Growth Capital Services, Inc., which is a registered broker-dealer (and a member of FINRA and SIPC). Richard Zanghetti serves as Managing Director for LionsBridge Securities and devotes approximately 25% of his time to this entity.

LionsBridge Insurance, LLC, is a Florida licensed insurance broker, and Richard Zanghetti is the qualifying insurance broker of this entity. LionsBridge Capital, LLC, is a Florida licensed real estate broker, which was formed for the purpose of participating in investment banking related business which requires a Florida real estate broker license (such as transactions structured as asset rather than stock sales). LionsBridge Advisors, LLC is a business consulting company that was formed to provide strategic planning, financial analysis, and other business consulting services primarily to business and corporate clientele. There may be situations where a clientele of LBAM separately engage one of the LionsBridge Affiliates to assist on a particular transaction, or to provide other services. Any transaction involving an LBAM client and any of the LionsBridge Affiliates may involve unique considerations, such as addressing any conflicts of interest that may be specific to the situation, and each LBAM client that separately engages any of the LionsBridge Affiliates will be provided with a written disclosure of any conflict of interest that may be present in order to ensure that all parties have a clear understanding of any factors or concerns that may be important.

Item 5- Additional Compensation

Rich does not receive any third party compensation for advisory services.

Item 6 - Supervision

We meet on a regular basis, not less than once a month, to review client objectives and asset allocations. We also review material correspondence with clients, client logs and trading activity.

Item 1- Cover Page

Tim Swett

LionsBridge Asset Management, LLC

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

Item 2- Educational Background and Business Experience

Tim Swett

Year of Birth: 1963

Tim has 21 years of experience in preserving and growing the wealth of high net-worth individuals and families. Tim began his career in 1990 with the American Express Private Bank in Hong Kong. He was promoted to Manager of the Private Bank before leaving to join Hong Kong Shanghai Bank Corp. (HSBC) in their Global Consulting Division. At HSBC, Tim worked with high-net worth and corporate clients in Hong Kong, London, Mumbai, New York, Riyadh, Seoul, and Sydney.

In 1999, Tim returned to his home in Texas and joined F&G Capital. F&G Capital is an Austin based Private Equity and Investment firm. Tim has an extensive background in traditional investments (stocks/bonds/options) as well as Alternative Assets; (Private Equity, Real Estate & Hedge Funds). From 2000 to 2010, Tim was responsible for managing and overseeing F&G's investment portfolio.

His responsibilities at LionsBridge include the continued management of the assets of F&G Capital, as well as, identifying innovative alternative investments and new business opportunities for LionsBridge.

Tim is an active philanthropist and advocate for several charities serving the needs of orphans and foster children worldwide. Tim sits on the Board of The Gift of Adoption Fund, Santa Barbara Medical Innovations, Montecito Medical Investment Company, and The Ralph and Eileen Swett Foundation.

Education: MA- International Economics, Johns Hopkins University, Washington, D.C. , 1988
BA- University of San Diego, San Diego CA, 1985

Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

Item 4- Other Business Activities

Timothy Swett also works for F&G Capital Management, spending approximately 40% of his time, managing the investment company's various private equity investments. F&G Capital has a portfolio of debt and equity investments in medical office real estate, apartment buildings, industrial buildings, raw land, energy companies and medical devices. Largely due to the company's equity stake, Timothy sits on the Board of Managers for Montecito Medical Investment Company, Santa Barbara Medical Innovations, and Montecito Investment Group.

Item 5- Additional Compensation

Tim does not receive any third party compensation for advisory services.

Item 6 – Supervision

We meet on a regular basis, not less than once a month, to review client objectives and asset allocations. We also review material correspondence with clients, client logs and trading activity.