Part 2A of Form ADV: Firm *Brochure*

Item 1 Cover Page

Brochure of:

Bob Brakeman Enterprises, LLC
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Date Issued:

March 1, 2011

This brochure provides information about the qualifications and business practices of Bob Brakeman Enterprises, LLC. If you have any questions about the contents of this brochure, please contact us at (307) 637-1001. 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 Bob Brakeman Enterprises, LLC also is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Material Changes

Not applicable to our firm at this time.

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Item 4 Advisory Business

Our investment advisory firm has been in business since 1978.

Our sole owner is Robert Brakeman.

We engage in only one strategy: writing (selling) covered-call options on blue chip stocks.

Within that overall strategy, we fashion each account to meet the individual needs of that particular investor (for example, by structuring the option deals to be short-term or intermediate-term or long-term, as the client prefers).

Although we do not check with clients before trading, we will reverse any trade at our expense if a client requests it upon receipt of their confirmation.

As is implied by the previous paragraph, we operate only on a "discretionary" basis, which means that we are permitted to make trades without checking with the client first (of course, this only occurs if and when a client gives us the permission to operate that way). As of 3-19-12, the amount of assets we manage is approximately $8,086,708.

Item 5 Fees and Compensation

Our billing system is based upon a hundred-year-old model that stockbrokers use.

Specifically, we charge a small percentage of the stock-amount going into each deal. That amount is generally 2% of the starting stock amount for deals expiring in one year or less, and 3% of the starting stock amount for deals expiring in more than one year.

Commissions are sometimes reduced from those levels but are never raised from those levels. Such reductions are not negotiated with the client (we do not negotiate fees, because of the large amount of time it would take), but are unilateral "good deeds" on our part. (For example, we have been known to do serious discounting when the economy is in a serious recession, on the theory that clients may have lessened household income, etc). We do not require prepayment of commissions; they come after trading, not before.

Although some broker/dealers (the technical name for the stock brokerage firms that have custody of your assets if you deal with us) allow investment advisory firms like ours to be paid directly out of the account, we prefer to bill clients directly, to allow them to keep complete control of the process. (The billing frequency is one-bill-per-deal, with the bill issued when the stock is bought; because many of the bills are small, some clients request-and-get a "consolidated" billing on a single piece of paper, rather than many pages containing many small bills individually).

In addition to our fee-per-deal, the broker/dealer who has physical custody of your assets also charges a commission; however, because we only use "deep discount" brokers, their fees are so low that most clients mentally disregard them.

We charge no annual fees, no quarterly fees, no monthly fees, no low-balance fees and no inactivity fees. The only miscellaneous charge we have is a one-time (non-recurring) start-up-fee charge during the first year of the relationship. This fee, which is $650 or $975 depending on the nature of the account, is usually dribbled-out-in-chunks during the first year.

We do not sell you any products; our firm sells you only our intellectual advice. (Only the broker/dealer has the "products" ---stocks & options--- in our 3-way relationship, and we receive no compensation from them for any products that they sell you).

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

Not applicable to our firm at this time.

Item 7 Types of *Clients*

Currently our firm is willing to accept accounts of all kinds, including individuals, trusts, investment clubs, etc.

In order to be as client-friendly as possible, we impose no minimum balance to open or maintain an account.

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

Because we use only one strategy (writing covered call options on blue chip stocks), our method-of-analysis is the same for each trade. Each trade contains both a stock-side and an option-side. For the stock, what we analyze is the question of whether a particular stock is safe enough and conservative enough for us to own. That criterion always keeps us within the Fortune 500 and usually within the Fortune 100.

For the option, we need to choose among the many possible options that are available for every blue chip stock. That process includes analyzing such factors as: (a) The profits available-for-the-client on any option, (b) the expiration-date for any particular option (we can choose to make the deal long-term or intermediate-term or short-term), and (c) the "strike price" for an option (that is the price at which we will let the "other side" of the deal take the stock away from us).

Although covered-call-writing is very conservative in-and-of itself, it can never be made risk-free, for this reason:

In order to make option-profits in the first place, we have to be willing to be in the stock market -- and we all know that being there can be a wild ride at times.

We can tame that ride quite a bit, but we can never completely eliminate the ride itself (by "ride" we mean the boom-and-bust cycle of stock prices).

The way we lessen the effects of that roller coaster (and therefore lessen the risk to our investors) is a 3-fold process:

(a) We are extremely diversified, which greatly lessens the ability of any single stock to whack us. (b) We stay within the ultra-blue-chip group, which makes us safer than investors who dabble in less conservative stocks. (c) We have a policy (only rarely broken) of never selling-while-down; we always ride-out market downturns and sell no stocks until recovery.

The only other risk factor is "margin". To operate "on margin" (which we do most of the time) means that clients are able to use their own money and also the broker's money (by borrowing it). That doubles one's purchasing power (a very important investment tool), but it can also have a downside: In the event of a market downturn, the broker/dealer can tell you to put some extra money into your account; and if you do not, the brokerage can sell one or more of your stocks.

We have many tools to limit margin risks, and virtually all our investors want to (conservatively) use margin once they discover its potential. So our view is that margin is usually appropriate, but people should consider both the upside and the downside to that investing tool.

Item 9 Disciplinary Information

We have no disciplinary history of any kind, ever.

More specifically:

(a) We have never been charged with any wrongdoing by the U.S. Securities and Exchange Commission.

(b) We have never been charged with any wrongdoing by any state securities agency.

(c) We have never been charged with wrongdoing by any foreign securities regulator.

(d) We have never had a single client-complaint registered against us in any forum.

(e) We have never been sued.

(f) Whether in the securities realm or otherwise, neither our firm nor its owner have any felony or misdemeanor charges or convictions in our past.

Item 10 Other Financial Industry Activities and Affiliations

Our firm has no legal or financial connection with any other firms in the investment industry.

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

As is required by federal securities rules, we have a Code Of Ethics for our firm. That document is always available, at no cost, to any client or prospective client who requests it.

The essence of our code of ethics is that we are fiduciaries.

A fiduciary is a firm or individual required to act in the best interests of someone else (in this case, an investment advisory client). Our code of ethics (as updated and amended from time to time) outlines in detail how we achieve that goal. Here, it is perhaps enough to say that it's really a double-goal: The "positive" one of creating benefits for the client, and the "negative" one of not damaging the client. Both are equally important and are the keys to how we manage client accounts.

Because we only recommend to clients securities that we are comfortable having in our own accounts, we are often in a situation in which we are buying, selling and holding the same securities as our clients; but we are always on the same "side" as clients --- buying when they are buying and selling when they are selling. We believe that avoids the kind of legal, regulatory and moral issues which might arise if we were on the "other side" of a strategy from the client. For example, it would be hard to justify our selling a particular stock while telling clients to buy it. So we would never put ourselves in that situation (or in <u>any</u> "other-side" situation).

Item 12 Brokerage Practices

In choosing the broker/dealers (stockbrokers) to use in executing our trades, we need them to be (a) federally insured by SIPC, and (b) low priced. We only use "deep discount" brokers, to take care of the price-issue, and every famous deep-discount broker is federally insured (we check).

In choosing which broker/dealers to use, we never accept anything from them for steering clients their way. We need to be objective in choosing which broker/dealer is best for our clients, and such objectivity would become impossible if we accepted items of value (free research, client referrals) from broker/dealers.

We always choose which broker/dealer to use, rather than asking-or-allowing the client to do it. The reason for that is very simple: Clients are going to hold our firm responsible for results, and the broker/dealer's policies will help determine those results; so we need to control that choice-of-broker/dealer.

Item 13 Review of Accounts

We review every account at least once a month officially, but in practice we may be doing "spot"-reviews more frequently than that. Such spot-reviews can be triggered by such events as (a) new capital arriving, (b) client suggestions/comments, (c) client questions, (d) trades beginning, or (e) trades ending. Mr. Brakeman does all reviews himself.

Since this tends to be a phone-industry rather than a letter-industry, whatever comments we have for clients after a periodic-review or a triggered-review are passed along to the client by phone.

Item 14 *Client* Referrals and Other Compensation

Our firm's compensation comes solely from clients. We do not accept any other income (sales awards, prizes, etc.) from any other source.

Although we never hire solicitors to find new clients for us, we do allow existing clients to refer new ones. When they do, we compensate them. That compensation is a certain percentage (it varies) of the commissions we earn from the new client. Those arrangements must, by law, be disclosed to the new client. Our firm "absorbs" all compensation paid the old client, with none of it passed along to the new client.

Item 15 *Custody*

We never take actual custody of client-funds; that is the broker/dealer's role.

Item 16 Investment Discretion

All our clients give us discretionary authority over their accounts, meaning that we need not check with them before each trade. Such power may be granted to us by some combination of (a) an investment advisory contract, (b) a "trading authority" at the broker/dealer and/or (c) a power of attorney.

While the client may, of course, revoke the trading authority at any time, while it is in effect we generally only allow them to "limit" it in one way: We are happy to accept a "special instruction" as to the length of deals. For example, a client may instruct us to keep all deals short term rather than long term, due to an upcoming need-for-cash.

Item 17 Voting *Client* Securities

We do not seek or accept the authority to vote client-securities (for such matters as tender-offers). Nonetheless, we are often knowledgeable about proxy fights and similar matters, so clients are free to contact us if they have questions (that kind of paperwork will come to our clients directly from the broker/dealer or an outside transfer agent).

Item 18 Financial Information

Because we do not require prepayment of fees, we are not required to include a balance sheet as part of this brochure.

Throughout the decades we have always been (heavily) solvent, and we know of no upcoming events which would change that or otherwise impair our ability to meet our contractual obligations to our clients.

Item 19 Requirements for State-Registered Advisers

This brochure-section is not applicable to our firm since we are Federally-Registered.