

**Firm Brochure  
(Parts 2A & 2B of Form ADV)**

**Tweddell Goldberg, LLC**

**20320 Midland Drive  
Sonora, CA 95370-9602**

**Or**

**9005 Woodland Drive  
Silver Spring, MD 20910-1513**

**PHONE**

**209-536-9734**

**Or**

**301-650-6567**

**FAX**

**209-536-9074**

**Or**

**240-599-1142**

**WEBSITE**

**[www.tginvesting.com](http://www.tginvesting.com)**

**EMAIL**

**Jerry Tweddell ([jerry@tginvesting.com](mailto:jerry@tginvesting.com))**

**This brochure provides information about the qualifications and business practices of Tweddell Goldberg, LLC.**

**If you have any questions about the contents of this brochure, please contact us telephone or by email. 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. Registration does not imply a certain level of skill or training.**

**Additional information is also available on the internet at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)**

**Our searchable IARD/CRD number is 141634**

**DATE**

**April 10, 2015**

## **Item 2: Summary of Material Changes**

Tweddell Goldberg, LLC is now registered with the Securities and Exchange Commission as an investment adviser.

Whenever you would like to receive a complete copy of our brochure, please contact us by telephone or by email.

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## Item 4: Advisory Business

We provide investment management and advisory services to individual clients, as well as trusts, qualified retirement plan sponsors, and business entities. We are a fee-only firm. The firm has been in business since 2006.

Advice is provided through consultation with you and may include: determination of financial objectives, identification of financial problems, tax planning, insurance review, investment management, education funding, retirement planning, and estate planning. Our main business, however, is investment management.

We provide both discretionary and non-discretionary services. With non-discretionary services, client approval is obtained before entering transactions. When we have discretionary trading authority, we have the authority to determine, without obtaining your specific consent, the securities to be bought or sold. We do not act as a custodian of your assets. You always maintain asset control. We place trades for you under a limited power of attorney.

Whenever practical, we generally recommend the mutual fund share class with lowest annual expense ratios that your custodian offers. That sometimes includes institutional share classes. At times we may recommend other low-cost investment solutions, such as ETFs, stocks, individual fixed income securities, and other products. For more on our investment philosophies, and the risks of our strategies and/or specific investments recommended, please refer to Item 8.

We actively seek to avoid, or at least minimize, conflicts of interest which may exist between our firm and you. We sell no products. We accept no commissions. However, all investment advisory firms will likely possess some unavoidable conflicts of interest. In those instances when conflicts of interest arise, we have adopted policies which seek to keep your best interests paramount at all times. See Items 5, 11 and 12 of this Brochure, and other items, which explore in further detail how we act to keep your best interests first at all times during the course of relationship with you.

Other professionals (e.g., lawyers, accountants, insurance agents, etc.) are engaged directly by you on an as-needed basis. Conflicts of interest will be disclosed to you in the unlikely event they should occur. We often know professionals that we can refer you to; we never accept fees for those referrals.

The initial meeting with potential clients, which may be in person or by telephone, is free of charge and is considered an exploratory interview to determine the extent to which investment management may be beneficial to you.

## **Our Principal Owners**

Jerold Tweddell is a member.

Steven Goldberg is a member

## **Types of Advisory Services**

### **Asset Management**

We provide investment supervisory services, also known as asset management services (discretionary); manage investment advisory accounts not involving investment supervisory services (non-discretionary); and furnish investment advice through consultations.

On an occasional basis, we may furnish advice to you on matters not involving securities, such as financial planning matters and taxation issues.

Assets are invested primarily in no-load or low-load mutual funds and exchange-traded funds, usually through discount brokers or fund companies. Fund companies charge each fund shareholder annual expenses that are disclosed in the fund prospectus. Discount brokerages charge a transaction fee for the purchase of some funds. We sometimes buy funds with higher expense ratios for you when discount brokerages offer them without charging transaction fees and we are investing a relatively small amount of money in that fund at that time. We always try to act in your best interests in choosing among different share classes of mutual funds.

Stocks and bonds may be purchased or sold through a brokerage account when appropriate. The brokerage firm charges a fee for stock and bond trades. We do not receive any compensation, in any form, from fund companies or brokerages.

Investments may also include: warrants, corporate debt securities, commercial paper, certificates of deposit, municipal securities, U. S. government securities, and options contracts.

### **Management of Conflicts of Interest between Clients**

Our relationship with you is non-exclusive; in other words, we provide investment management and advisory services to multiple clients. We seek to avoid situations in which one client's interest may conflict with the interest of another of our clients. More information about this policy is found in your Client Agreement.

### **Comparable Services**

We believe that the charges and fees charged by brokers/custodians we use are competitive with alternative programs available through other firms offering a similar range of services; however, lower fees for comparable services may be available from other sources.

## **Management of Conflicts of Interest Relating to the Fees We Receive, and Receipt of Percentage-Based Compensation.**

The vast majority of our clients pay us fees based upon a percentage of the assets we advise upon. This is a very common form of compensation for registered investment advisory firms and avoids the multiple inherent conflicts of interest associated with commission-based compensation (we do not accept commission-based compensation of any nature, nor do we accept 12b-1 fees). We endeavor at all times to properly manage potential conflicts of interest. Our goal is that our advice to you remains at all times in your best interests, disregarding any impact of the decision upon our firm.

Each time such a potential conflict may arise, we will give you notice, usually orally, of the conflict in that given situation if our advice regarding the proposed transaction would impact our compensation.

### **Assets Under Management**

As of December 31, 2014, we manage approximately \$106 million in assets for approximately 105 clients. Approximately \$56 million is managed on a discretionary basis, and about \$50 million is managed on a non-discretionary basis.

### **Our Services are Tailored to Meet Your Needs and Investment Restrictions.**

In general, our advisory services are designed to meet your needs. While model portfolios may be utilized, each investment portfolio is individually tailored. If your circumstances change, it is the client's responsibility to notify us. During any 12-month period, clients will communicate with us under normal circumstances. If there has been no contact(s), as appropriate, you will confer with us at least annually to review any changes to your financial situation, and your investment portfolio.

After consultation with us, you may impose restrictions on investing in certain securities or types of securities. This most often occurs when you request certain social investing needs be addressed, such as through the use of mutual funds which avoid investments in certain companies. Other restrictions may be imposed by you with respect to the (average or longest) maturity or credit quality of fixed income investments.

Our Agreement with you may not be assigned without your consent.

## **Item 5: Fees and Compensation**

Item 5 A. We base our fees on a percentage of assets under management, and/or hourly charges.

Fees for investment management services are negotiable subject to a maximum of 1.00% per year.

Item 5 B. Depending on the agreement made with clients, investment management fees are billed quarterly or semi-annually, in arrears or in advance, meaning that we invoice you for the three- or six-month billing period that has just ended or is beginning. Payment in full is expected upon invoice presentation. Fees are deducted from an account designated by you to facilitate billing or paid by check from the client. You must consent in advance to direct debiting of your investment account.

We will send a statement to you showing the amount of the fee, the value of your assets upon which the fee was based, the time period covered by the fee, and the specific manner in which the fee was calculated. It is your responsibility to verify the accuracy of the fee calculation. The custodian will not determine whether the fee is properly calculated. We will send a bill to the custodian indicating only the amount of the fee to be paid.

### Hourly Planning Engagements

We occasionally provide planning services for clients who need advice on a limited scope of work. The rate for limited scope engagements is negotiable. Hourly fees are at the rate of \$100.00 per hour.

Client agrees to pay to T G LLC fees within thirty (30) days after the report is completed and available to the Client.

### How Fees are Calculated

Billing amounts are based upon the value (market value or fair market value in the absence of market value) of the client's account(s) (including both securities and cash) at the end of the previous quarter (or, for new clients, upon a date agreed to by us and you). Valuations are derived from recognized and independent pricing sources, such as TD Ameritrade Institutional.

### Other Fees or Expenses Paid in Connection with Our Services

Item 5 C. All fees paid to us for investment advisory and management services are separate and distinct from the fees and expenses charged by mutual funds to their shareholders. Mutual fund expenses are described in each fund's prospectus. These expenses will generally include a management fee, other fund expenses, and possibly a distribution fee. In addition, mutual funds incur transaction costs and opportunity costs, which are not disclosed in the fund's prospectus or Statement of Additional Information, but which may be estimated.

You will incur transaction fees or commissions in connection with trading of mutual funds, ETFs, individual stock and bonds (and/or principal mark-ups and mark-downs for principal trades), which are charged by the custodian (brokerage firm holding your assets for safekeeping). Mutual fund transaction fees charged by our recommended custodian, TD Ameritrade Institutional, generally vary from \$24 to \$31 for each purchase and sale transaction. The transaction costs for stocks and ETFs are generally \$10. Costs for bond trades vary. Accordingly, you should review both the fees charged by the funds (including transaction and market-impact costs within funds which are not included in a fund's annual expense ratio), the transaction fees charged by the custodian, as well as the fees charged by

us, to fully understand the total amount of fees and costs paid by you, in connection with any recommended transaction. For a discussion of our practice in recommending brokers (custodians) to you and negotiating brokerage fees on your behalf, please see Item 12.

You may also incur "account termination fees" upon the transfer of an account from one brokerage firm (custodian) to another. The range for these account termination fees is believed to range generally from \$0 to \$200 at present, but at times may be much higher. You should contact your custodians (brokerage firms, bank or trust company, etc.) to determine the amount of account termination fees which may be charged and deducted from your accounts for any existing accounts which may be transferred.

## **Cancellation and Termination of Agreements**

Item 5 D. Upon termination of any account, any prepaid, unearned fees will be promptly refunded, with the refund calculations based pro rata to the date of termination. Termination of an agreement will not affect: (a) the validity of any action previously taken by us under the agreement; liabilities or obligations of the parties from transactions initiated before termination of the agreement; or your obligation to pay advisor fees (prorated through the date of termination). Upon the termination of the agreement, we will have no obligation to recommend or take any action with regard to the securities, cash, or other investments in your account.

## **Item 6: Performance Based Fees**

Our fees are not based on a share of the capital gains or capital appreciation of managed securities.

We do not use a performance-based fee structure because of the potential conflict of interest. Performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to you.

## **Item 7: Types of Clients**

We provide investment advice primarily to individuals and their families, including high net worth individuals.

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

### **General**

We use a combination of fundamental and technical analysis to pick funds. We review data on Morningstar, interview fund managers and fund sales people, consider what various market strategists are saying, and examine valuations. For REITs, we rely almost entirely on an outside research service. For individual stocks, we rely heavily on Morningstar research.

The main sources of information include research services paid for by us, financial newspapers and magazines, inspections of corporate activities, research materials prepared by others, corporate rating services, timing services, annual reports, prospectuses, filings with the Securities and Exchange Commission, and company press releases.

### Methods of Analysis; Sources of Information

Our security analysis is based upon a number of factors including those derived from securities rating services, general economic and market and financial information, due diligence reviews, and specific investment analyses that clients may request. The main sources of information include commercially available investment information and evaluation services, financial newspapers and journals, academic white papers and periodicals. Prospectuses, statements of additional information, other issuer-prepared information, and data aggregation services are also utilized.

### Types of Investments

Clients' investment portfolios are typically invested in stock and bond mutual funds, individual stocks, real estate investment trusts, CD's and money market funds.

Insurance products such as annuities and various types of life insurance products may also be evaluated. Recommendations may be made for you to invest in low-cost, no-load (no commission) variable or fixed deferred or immediate annuities when appropriate to your circumstances and tax situation.

Your existing investments are evaluated in light of the desired investment policy objectives. We work with you to develop a plan to transition from your existing portfolio to the desired portfolio. Investment advice may be offered on any investments held by you at the start of the advisory relationship. Your portfolio holdings and strategic asset allocation are then monitored periodically, taking into account your cash flow needs. Review meetings with you are held regarding your investment assets under management.

### Risk of Loss, Generally

Investing in securities involves a risk of loss that you should be prepared to bear. The investment recommendations seek to limit risk through broad global diversification in equities (through broadly diversified stock mutual funds and/or stocks) and investment in fixed income securities or diversified bond funds.

However, the investment methodology will still subject you to declines in the value of your portfolios which can at times be dramatic. Investing is inherently uncertain as to future returns. While both macroeconomic and microeconomic risks are evaluated, for purposes of weighing risks and returns, there can be no assurance that we'll get it right. While we seek to reduce non-compensated risks to which you may be exposed, other risks (including but not limited to the risk of a general stock market decline) may be assumed in order to seek to attain the client's longer-term financial goals and objectives; however, we cannot provide any guarantee that the client's goals and objectives will be achieved.

### Risk of Loss, Certain Higher-Risk Securities

Certain securities recommended, such as emerging markets stock and bond funds and U.S. small cap value and mid cap value stock mutual funds possess higher levels of volatility than the overall stock market. We may employ these securities as part of an overall strategic asset allocation for you, and when such is undertaken we possess a reasonable belief that the risk-return relationship for these securities will likely be beneficial you over the long term.

### Cash Balances in Client Accounts

Cash in your investment accounts are typically swept into the bank or money market mutual fund accounts of the institution (TD Ameritrade). We discuss with you, during the time of review conferences and at other times, upcoming cash flow needs and seeks to plan accordingly to meet those needs. While it is not the practice to encourage you to maintain a large amount of cash in your accounts, such may be undertaken at your request, to facilitate our billing of periodic fees, or for other reasons. Upon your request, cash balances will be maintained for temporary or short-term purposes.

## Item 9: Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events of their firm or certain management personnel which would be material to your evaluation of us or our integrity in management of your investment portfolio.

We have had no legal or disciplinary events to disclose.

## Item 10: Other Financial Industry Activities and Affiliations

### Financial Industry Activities

We are not involved in any other financial industry activities.

Mr. Goldberg is a weekly columnist for Kiplinger.com, and also writes for other publications.

### Affiliations

We have no arrangements that are material to our advisory business or you with any other entity.

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

We seek to avoid material conflicts of interest. Accordingly, we do not receive any third party direct monetary compensation (i.e., commissions, 12b-1 fees, or other fees) from brokerage firms (custodians) or mutual fund companies.

Although we believe that our business methodologies, ethics rules, and adopted policies are appropriate to eliminate, or at least minimize, potential material conflicts of interest, and to manage appropriate any material conflicts of interest that may remain, you should be aware that no set of rules can possibly anticipate or relieve all potential material conflicts of interest. Please refer to the additional discussion under Item 12 Brokerage Practices.

### Our Code of Ethics

We have adopted a Code of Ethics, to which all investment advisor representatives and employees are bound to adhere. The key component of our Code of Ethics states:

We and its investment advisor representatives and employees shall always:

- Act in the best interests of each and every client;
- Act with integrity and dignity when dealing with clients and prospective clients;
- Seek at all times to preserve our firm's independence and to maintain our complete objectivity with respect to our advisory services and each recommendation made to our clients.

We further adopted a detailed Code of Ethics expressing our commitment to ethical conduct, and which is utilized to guide our personal conduct. This detailed Code of Ethics describes our fiduciary duties and responsibilities to you and sets forth our practice of supervising the personal securities transactions of employees with prior or concurrent access to client trade information.

A copy of the Code of Ethics is available to you and prospects upon request.

### Participation or Interest in Client Transactions and Personal Trading

Our Code of Ethics provides that individuals associated with our firm may buy or sell securities for their personal accounts identical or different than those recommended to you. However, it is the expressed policy of our firm that no person employed by the firm shall prefer his or her own interest to yours.

Mr. Tweddell personally owns 150 shares of Hennessy Advisors the advisor to the Hennessy family of mutual funds. Clients who invest in any of the Hennessy funds are given prior notice of this ownership interest.

To supervise compliance with the Code of Ethics, we require that anyone associated with this advisory practice and who possesses access to advisory recommendations (before or at the time they are entered into) ("access persons") have his or her securities holdings reviewed annually and transactions reviewed quarterly by our Chief Compliance Officer or his designee. We also require access persons to receive advance approval from our Chief Compliance Officer or his designee prior to investing in any initial public offerings or private placements, and with regard to trading of certain individual securities.

The Code of Ethics further includes our policy prohibiting the use of material non-public information and protecting the confidentiality of client information. We require that all individuals must act in accordance with all applicable Federal and State regulations governing

registered investment advisory practices. Any individual not in observance of the above may be subject to discipline.

## **Item 12: Brokerage Practices**

### **Use of Brokerage Firms (Custodians), Generally**

We recommend that you use TD Ameritrade, Inc. ("TD Ameritrade") as your broker. The services provided by TD Ameritrade are a factor in our suggestion that you use TD Ameritrade, whose services will ordinarily include monthly or at least quarterly account statements to you. TD Ameritrade will also provide us with computer software services whereby we can place orders and obtain up to date review of your accounts.

### **Discussion of Benefits to Adviser from Custodians**

The benefits provided by TD Ameritrade include assistance with practice management and assistance with the management of client accounts, including but not limited to: (a) receipt of duplicate client confirmations; (b) receipt of electronic duplicate statements; (c) access to a trading desk serving investment adviser firm participants exclusively, and providing research, pricing information, and other market data; (d) access to the investment advisor portion of their web sites which includes practice management articles, compliance updates, and other investment related information and research materials (including, for example, rating reports on individual companies from Standard and Poor's or other sources); (e) access to other vendors (such as insurance or compliance providers, or providers of research or other materials) on a discounted fee basis through discounts arranged by the custodians; (f) permitting us to access an electronic communication network for client order entry and to access clients' account information and which may otherwise assist us with its back-office functions, including recordkeeping and client reporting; and (g) conferences at which advisors and employees of our firms may attend (with no registration fees) and receive education on issues such as practice management, marketing, investment theory, financial planning, business succession, regulatory compliance, and information technology.

Generally, many of these services may be utilized to service all or a substantial number of our clients' accounts. Educational, research, or other services provided by custodians (i.e., TD Ameritrade) or mutual fund companies may benefit all of our clients, or may benefit only some clients. We may have an incentive to select or recommend a broker-dealer based on our interest in receiving the research or other products or services, rather than on your interest in receiving most favorable execution.

### **Our Recommendations of Brokerage Firms**

You are permitted to direct us to utilize your desired brokers. However, if such brokers are utilized, we may not possess access to certain lower-cost mutual funds and other investments that are generally available only to institutional investors or which would require a significantly higher minimum initial investment, and commission rates paid or transaction fees paid may be higher than the fees negotiated by us.

While as a fiduciary, we endeavor to act in your best interests, our desire that you maintain much of your assets in accounts at TD Ameritrade may be based in part on the benefit to our firm of the availability of some products and services (previously described) at no cost to us, or at reduced costs, and not solely on the nature, cost, or quality of custody and brokerage services provided by the brokers, and this may create a potential conflict of interest. You may, therefore, pay higher transaction fees, commissions (for individual stock and ETF trades), and principal mark-ups and mark-downs (relating to purchases and sales on a principal, as opposed to an agency, basis), than those charged by other discount brokers. However, we have selected this custodian for its generally low fees relative to another large custodian. Also, please note that we prefer to recommend custodians who possess significant size and financial resources. For all of these reasons, the lowest cost custodian for you may not be recommended to you by us.

### Best Execution

We review the execution of trades at the custodian annually. Trading fees charged by the custodians are also reviewed on an annual basis. We do not receive any portion of the trading fees.

### Soft Dollars

We do not receive any soft dollar benefits from broker/dealers acting as custodian for your accounts.

### Order Aggregation

We may aggregate sales and purchases of securities for all client accounts and its employee accounts if, in our reasonable judgment, such aggregation will result in some overall economic benefit and/or no economic detriment to Client(s). In accounting for such aggregated transactions, prices and commissions will be averaged on a per unit basis daily, subject to minimum transaction charges that may be imposed by the account custodians. Any employee transaction will occur only after Client(s) orders are completed, or at the same time, or not on terms that would jeopardize the price received by Client(s).

Most trades are mutual funds or exchange-traded funds where trade aggregation does not garner any client benefit.

## Item 13: Review of Accounts

Portfolio reviews are performed by Jerold Tweddell, Managing Member and Steven Goldberg, Managing Member.

Portfolio Reviews your portfolio, for the assets held under management with us will be undertaken: (1) periodically; (2) upon request, and (3) during times of high market volatility, under the following adopted policies and procedures.

Additional Portfolio Reviews are undertaken upon your request, such as when special cash needs arise or when additional cash or securities are added to the investment portfolio. We will respond to such requests within a reasonable period of time.

We may also undertake sales and purchases during this time to effect tax loss harvesting, in addition to rebalancing actions.

### Regular Reports

Quarterly or Semi-Annual Reports from us include a more thorough analysis of your investment portfolio and its performance than the reports you receive from TD Ameritrade.

We may also offer periodic data for other investment accounts upon which we provide advice, not held at the foregoing custodians, if such information can be obtained from our account aggregation services, and provided your consent is obtained to furnish such account aggregation service with any account passwords required to access account information.

While we are hopeful that the information supplied by custodians and data aggregation services is reliable, we cannot guarantee its accuracy.

Clients may also directly access account information at the custodians with which the accounts are held online (TD Ameritrade Institutional) virtually anytime via the secure web site.

Monthly or Quarterly Statements Directly from Account Custodians are sent to you directly from the corresponding brokers and mutual funds which hold your investments. These statements reflect the assets in the custodian's custody, together with confirmations of each transaction executed in the account(s). For some custodians, you may elect to receive these statements by e-mail rather than U.S. mail.

You are strongly encouraged to compare the monthly or quarterly statements you receive from custodians with the reports you receive from us. Despite the best efforts of any firm to safeguard client's assets, fraud could still occur. While we hope that you trust our firm, and we have never had an instance of theft of client funds, we believe it is nevertheless important for you to verify your investment holdings.

## Item 14: Payment for Client Referrals

### Incoming Referrals

We have been fortunate to receive many client referrals over the years. The referrals came from current clients, estate planning attorneys, accountants, employees, personal friends of employees and other similar sources. We do not compensate referring parties for these referrals.

### Referrals Out

We do not accept referral fees or any form of remuneration from other professionals when a prospective client or client is referred to them.

### Other Compensation

We do not receive any commissions or referral fees for any recommendations we make to other professionals.

### Item 15: Custody

It is our policy to not accept custody of your securities. In other words, we are not granted access to your accounts which would enable us to withdraw or transfer or otherwise move funds or cash from any of your account(s) to our accounts or the account of any third party (other than for purposes of fee deductions).

However, with your consent, we may be provided with the authority to seek deduction of our fees from your accounts; this process generally is more efficient for both you and us.

We will send a statement to you showing the amount of the fee, the value of your assets upon which the fee was based, and the specific manner in which the fee was calculated. It is your responsibility to verify the accuracy of the fee calculation. The custodian will not determine whether the fee is properly calculated. We will send a bill to the custodian indicating only the amount of the fee to be paid.

You are strongly encouraged to compare the monthly or quarterly statements you receive from custodians with the reports you receive from us. Despite the best efforts of any firm to safeguard client's assets, fraud could still occur. While we hope that you trust our firm, and we have never had an instance of theft of client funds, we believe it is nevertheless important for you to verify your investment holdings.

### Item 16: Investment Discretion

We accept limited forms of discretion over your accounts, as follows, with your consent. Your grant of discretion is evidenced in the client services agreement (or addendums thereto) signed by you, and is further evidenced to the custodians through a limited power of attorney contained in the account establishment form signed by you or a separate limited power of attorney document signed by you.

You approve the custodian to be used and the commission rates paid to the custodian. We do not receive any portion of the transaction fees or commissions paid by you to the custodian on certain trades.

You may limit our investment selection universe to social responsible investments.

### Item 17: Voting Client Securities

As a matter of firm policy and practice, we do not accept authority to vote proxies on your behalf. You retain the responsibility for receiving and voting proxies for any and all securities

maintained in your portfolios. Generally, you will receive their proxies or other solicitations directly from the custodian or transfer agent. However, you may call or e-mail us with questions regarding a particular proxy or other solicitation, and we may provide advice to you regarding your voting of proxies or such solicitations, upon your request.

You should note that we will not advise nor act on your behalf in legal proceedings involving companies whose securities are held or previously were held in the your account(s), including, but not limited to, the filing of "Proofs of Claim" in class action settlements. If desired, you may direct us to transmit copies of class action notices to you or a third party. Upon such direction, we will make commercially reasonable efforts to forward such notices in a timely manner.

## **Item 18: Financial Information**

We do not require the prepayment of more than \$1,200 in fees per client, six months or more in advance.

We accept limited forms of discretion over your accounts, as described in Item 16 of this Brochure. Due to this acceptance, we are required to disclose any financial condition that is reasonably likely to impair our ability to meet contractual commitments to clients. We currently possess no such financial condition. We have never been the subject of a bankruptcy proceeding.

## **Additional Information**

### **California Disclosures**

The California Code of Regulations (10 CCR Section 260.235.2) imposes two notice requirements upon financial advisers: (a.) lower cost comparable services may be available from others, and (b.) the possibility exists for a conflict of interest between your interests and ours. You are under no obligation to purchase advice or services from us.

All material conflicts of interest under CCR Section 260.238 (k) have been disclosed regarding the adviser, its representatives or any of its employees, which could be reasonably expected to impair the rendering of unbiased and objective advice.

### **Business Continuity Plan**

#### **General**

We have a Business Continuity Plan in place that provides detailed steps to mitigate and recover from the loss of office space, communications, services or key people.

#### **Disasters**

The Business Continuity Plan covers natural and manmade disasters.

Electronic files are backed up daily and archived offsite.

### **Alternate Offices**

An alternate office has been identified to support ongoing operations in the event the main office is unavailable. It is our intention to contact you within five days of a disaster that dictates moving our office to an alternate location.

### **Information Security Program**

We maintain an information security program to reduce the risk that your personal and confidential information may be breached.

### **Privacy Notice**

We are committed to maintaining the confidentiality, integrity and security of the personal information that is entrusted to us. The categories of nonpublic information that we collect from you may include information about your personal finances, information about your health to the extent that it is needed for the financial planning process and information about transactions between you and third parties. We use this information solely to help you meet your personal financial goals.

With your permission, we disclose limited information to attorneys, accountants, and mortgage lenders with whom you have established a relationship. You may opt out from our sharing information with these nonaffiliated third parties by notifying us at any time by telephone, mail, fax, email, or in person. With your permission, we share a limited amount of information about you with your brokerage firm in order to execute securities transactions on your behalf.

We maintain a secure office to ensure that your information is not placed at unreasonable risk. We employ a firewall barrier, secure data encryption techniques and authentication procedures in our computer environment.

We do not provide your personal information to mailing list vendors or solicitors. We require strict confidentiality in our agreements with unaffiliated third parties that require access to your personal information, including financial service companies, consultants, and auditors. Federal and state securities regulators may review our Company records and your personal records as permitted by law.

Personally identifiable information about you will be maintained while you are a client, and for the required period thereafter that records are required to be maintained by federal and state securities laws. After that time, the information will be destroyed.

We will notify you in advance if our privacy policy is expected to change. We are required by law to deliver our Privacy Policy to you annually, in writing.

## **Brochure Supplement (Part 2 B of Form ADV)**

### **Tweddell Goldberg, LLC**

**20320 Midland Drive  
Sonora, CA 95370-9602**

**Or**

**9005 Woodland Drive  
Silver Spring, MD 20910-1513**

#### **PHONE**

**209-536-9734**

**Or**

**301-650-6567**

#### **FAX**

**209-536-9074**

**Or**

**240-599-1142**

#### **WEBSITE**

**[www.tginvesting.com](http://www.tginvesting.com)**

#### **EMAIL**

**Jerry Tweddell ([jerry@tginvesting.com](mailto:jerry@tginvesting.com))**

This brochure supplement provides information about Jerold Tweddell and Steven Goldberg that supplements the Tweddell Goldberg, LLC brochure. You should have received a copy of that brochure. Please contact us if you did not receive Tweddell Goldberg, LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about Jerold Tweddell and Steven Goldberg is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

#### **DATE**

**April 10, 2015**

### **Education and Business Standards**

We require that advisors in our employ have a bachelor's degree. Additionally, advisors must have work experience that demonstrates their aptitude for investment management.

## Jerold Tweddell

### Item 2. Educational Background and Business Experience:

#### **Educational Background:**

\* Year of birth: 1940

\* Institutions

St. Lawrence University, BA. 1962

#### **Business Experience:**

Member and Chief Compliance Officer for Tweddell Goldberg, LLC since July 2006.

California Registered Investment Adviser from 1991 to 2006

### Item 3. Disciplinary Information:

None

### Item 4. Other Business Activities:

Co-author of Pick Winning Mutual Funds (John Wiley & Sons) and Winning With Index Mutual Funds (AMACOM), he has written articles for Financial Planning magazine and InvestmentNews. In addition, he has received numerous mentions in The Wall Street Journal, SmartMoney and The New York Observer.

### Item 5. Additional Compensation:

None

### Item 6. Supervision:

Mr. Tweddell and Mr. Goldberg are both Portfolio Managers and serve on the investment committee and supervise each other. The managing members frequently communicate with each other by telephone or email to discuss investment decisions.

## Steven Goldberg

### Item 2. Educational Background and Business Experience:

#### **Educational Background:**

- \* Year of birth: 1949
- \* Institutions
  - University of California at Berkeley 1966-68
  - American University, BA 1971

#### **Business Experience:**

Member Tweddell Goldberg, LLC since July 2006

Contributing Columnist, Kiplinger since 2006

From 1994 to 2006, he was a full-time investment writer, with the title of Associate Editor and later Senior Associate Editor at Kiplinger's Personal Finance Magazine. He is the author of But Which Mutual Funds: How to pick the right ones to achieve your financial dreams (Kiplinger Books).

### Item 3. Disciplinary Information

None

### Item 4. Other Business Activities:

Mr. Goldberg is a weekly columnist for Kiplinger.com, and also writes for other publications.

### Item 5. Additional Compensation:

None

### Item 6. Supervision:

Mr. Tweddell and Mr. Goldberg are both Portfolio Managers and serve on the investment committee and supervise each other. The managing members frequently communicate with each other by telephone or email to discuss investment decisions.