



SYM Financial Corporation

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Part 2A of Form ADV: *Firm Brochure*

10/04/2017

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. 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. 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

This Brochure dated 10/04/2017 replaces the version dated 03/31/2017 which was our last annual amendment.

You will receive a copy of this Brochure or a summary of any material changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year. We may provide other ongoing disclosure information about material changes, as necessary. We will further provide you with a new Brochure, as needed at any time, based on changes or new information, without charge.

Key updates were made to the following sections of Part 2A since our last annual amendment:

Item 4 – Types of Advisory Services

Item 5 – Fees and Compensation

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

Item 11 – Code of Ethics

Item 12 – Brokerage Practices

Item 15 – Custody

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Item 4 Advisory Business

SYM Financial Corporation is a registered investment adviser with its principal place of business located in Indiana. SYM Financial Corporation began conducting business as a 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 W. Yeager, CEO

— Rodney S. Coleman, President

PORTFOLIO MANAGEMENT SERVICES

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. In some cases, we offer these portfolio management services to the self-directed portion of a SYM Direct 401(k) plan.

Our investment recommendations are not limited to any specific product or service offered by a broker-dealer or insurance company. 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. 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.

WEALTH MANAGEMENT SERVICES AND FINANCIAL PLANNING

Our firm provides wealth management services based on the individual needs of the client. Through detailed discussions, we help our wealth management clients develop goals and objectives based on the client's particular circumstances.

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. If needed, Clients purchasing this service receive a report which provides the client with a detailed financial plan designed to assist the client to 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, including stock option strategies.

- **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 which may include the client's current financial status, tax status, future goals, returns objectives and attitudes towards risk. We carefully review documents supplied by the client. 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.

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.

FINANCIAL PLANNING PROJECTS

We also provide financial planning services on a project basis.

QUALIFIED PLAN CONSULTING SERVICES

We provide several advisory services separately or in combination. While the primary clients for these services will be 401(k), 403(b), profit sharing and pension plans, we offer these services, where appropriate, to individuals and trusts, estates and charitable organizations. Qualified Plan 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 review and consider various mutual funds (both index and managed) to determine which investments are appropriate in order to implement the client's IPS. We then assist plan sponsors in constructing an investment lineup that includes asset allocation models, target date funds and individual mutual funds.

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 qualified plan clients with individual plan participants exercising control over assets in their own account ("self-directed plans"), we may also provide 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.

ASSETS UNDER MANAGEMENT

As of 12/31/2016, we were actively managing \$ 1,248,124,969 of clients' assets on a discretionary basis plus \$759,595,625 of clients' assets on a non-discretionary basis.

Item 5 Fees and Compensation

PORTFOLIO MANAGEMENT SERVICES

Our annual fees for portfolio management services are based upon a percentage of assets under management and generally range up to 1% of assets managed by SYM.

Portfolio Management Fee Schedule

Assets up to \$1.5MM	1.00%
The next \$1.5MM (Assets between \$1.5MM and \$3.0MM)	0.80%
The next \$2.0MM (Assets between \$3.0MM and \$5.0MM)	0.60%
The next \$5.0 MM (Assets between \$5.0MM and \$10.0 MM)	0.40%
Assets above \$10.0MM	0.30%

SYM Direct 401(k) Fee Schedule

This Fee Schedule only applies if SYM is managing the self-directed portion of a SYM Direct 401(k) plan and is independent of the Portfolio Management Fee Schedule above.

Assets up to \$500,000	0.60%
The next \$500,000 (Assets between \$500,000 and \$1.0MM)	0.50%
Assets above \$1.0MM	0.40%

Our fees are billed quarterly, in advance, at the beginning of each client's quarterly cycle 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.

This account fee is 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 negotiated fee.

WEALTH MANAGEMENT SERVICES AND FINANCIAL PLANNING 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.

If Portfolio Management Fee is:	Add this Wealth Management Base Fee:	Minimum Total Fee is:
\$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		

All fees are computed by applying the appropriate fee schedule of the applicable billing period and dividing by 4.

If allowed by the client agreement, SYM may be authorized by Client to direct the custodian of the account to deduct the account for fees incurred. In other cases, the client may elect to receive an invoice for payment for these services. Even if fees are deducted, an invoice will be sent showing that the wealth management fee has been deducted (we will seek to deduct all fees from non-qualified accounts if they exist).

FINANCIAL PLANNING PROJECT FEES

SYM Financial Corporation's Financial Planning project 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 project fees are calculated and charged on an hourly basis, ranging from \$50 to \$200 per hour for the project. We may request a retainer upon completion of our initial fact-finding session with the client; however, advance payment will never exceed \$1,200 for work that will not be completed within six months. We will provide an estimate for the total hours at the start of the advisory relationship. The balance is due upon completion of the project.

In some cases, we may charge a flat fee for the financial planning project, in which case, the flat fees are charged in advance at the beginning of each client's quarterly cycle based upon the client's agreement.

QUALIFIED PLAN CONSULTING FEES

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

Plan Assets	Fee
\$0 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 to \$17,500,000	0.30%
\$17,500,000 to \$ 20,000,000	0.25%
*minimum fee of \$500 per quarter	
3(38) Investment Manager Fiduciary Fee	
\$0 to \$5,000,000	0.10%
\$5,000,000 to \$10,000,000	0.07%
\$10,000,000 to \$20,000,000	0.05%

Plan sponsors are invoiced in arrears at the beginning of each calendar quarter. An annual minimum fee of \$2,000 is required.

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. During this time transactions will be made only with Client approval.

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.

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.

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, including High Net Worth Individuals
- Qualified Retirement plans (other than plan participants)
- Charitable organizations
- Corporations or other businesses not listed above

METHODS OF ANALYSIS AND INVESTMENT STRATEGIES

When creating portfolios, we utilize top-down asset allocation strategies to diversify each account. We seek to select the most suitable fund managers to utilize in our portfolios, and our Investment Committee meets regularly to analyze economic data, market analysis and manager performance. When market opportunities are apparent, we may make tactical asset allocation shifts. SYM uses 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.

Based on this data, our understanding of your own financial goals and tolerance for risk, and the ideal location of your assets (i.e., in taxed vs. deferred-taxed accounts), SYM seeks to create a customized portfolio using a combination of global bonds, equity funds, and alternatives. We work with our clients to determine the strategy(ies) are appropriate to their needs and consistent with the client's investment objectives, risk tolerance, and time horizons, among other considerations. Portfolios may be invested in one of our Model Strategies which we use to manage an equities-only portfolio and various blended portfolios which are constructed using both equity and fixed income funds. SYM will also manage custom portfolios based on a client's Investment Policy Statement. Alternative strategies may employ investments in private investment vehicles, liquid alternatives or derivatives.

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. When utilizing this strategy, 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.

Margin transactions. For certain clients, we may 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 may 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 may buy a put if we have determined that the price of the stock will fall before the option expires.

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

We may 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 may 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.

MATERIAL RISKS OF INVESTMENT STRATEGIES

There can be no guarantee of success of the strategies offered by SYM. These strategies may employ limitations on particular sectors, industries, countries, regions or securities and are subject to certain risks as outlined below.

Market Risk. The profitability of a significant portion of SYM's recommendations may depend on stocks and bonds appreciating in value over a 7- to 10-year horizon. There is the possibility that the value of securities may decline due to daily fluctuations in the securities markets.

Security prices vary daily as a result of many factors, including developments that affect the condition of an individual company and the market in general. In addition, investment portfolios may be affected by other economic conditions such as changes in interest rates, foreign currency fluctuations, availability of credit, inflation rates, changes in laws, and national and international political circumstances. In particular, the price of many securities assumes favorable tax treatment (e.g. taxes on dividends and capital gains or certain tax-exempt municipal bond interest payments). The continued tax-favored treatment of certain securities cannot be guaranteed and the suspension or limitation of tax advantages could have a material, negative impact on the market price of a security.

Management through Similarly-Managed “Model Strategy” Accounts. SYM manages certain accounts through the use of similarly managed “model” portfolios, whereby the firm allocates all or a portion of its clients’ assets among various mutual funds and/or securities on a discretionary basis using one of its proprietary investment strategies.

The model strategy used to manage a model portfolio may involve portfolio turnover that could negatively impact clients’ net after-tax gains. While the firm seeks to ensure that clients’ assets are managed in a manner consistent with their individual financial situations and investment objectives, securities transactions effected pursuant to a model investment strategy may have individual tax ramifications for certain clients.

Use of Independent Managers. SYM may recommend the use of an independent, unaffiliated investment manager to manage a portion, or all, of a client’s portfolio. In these situations, SYM continues to conduct ongoing due diligence of such managers, but such recommendations rely to a great extent on the independent managers’ ability to successfully implement their investment strategies. In addition, SYM generally may not have the ability to supervise the independent managers on a day-to-day basis.

Accuracy of Public Information. SYM may rely, in part, on the basis of information and data filed by issuers with various government regulators, information made directly available to the Advisor by the issuers, or information accessed through available sources other than the issuers. Although SYM evaluates all such information and data and typically seeks independent corroboration when SYM considers information to be appropriate and reasonably available, SYM is not in a position to guarantee the completeness, genuineness or accuracy of such information and data.

Short Sale Risk. A short sale involves the sale of a security that the client account does not own in the expectation of purchasing the same security (or a security exchangeable for such security) at a later date at a lower price. To make delivery to the buyer, the account must borrow the security, and is obliged to return the security to the lender, which is accomplished by a later purchase of the security. A profit or a loss results from a short sale if the price of the security decreases or increases, respectively, between the date of the short sale and the date on which the short position is covered, i.e., the security to replace the borrowed security is purchased. A short sale involves the theoretically unlimited risk of an increase in the market price of the security that would result in a theoretically unlimited loss.

Margin Risk. If a client account uses margin to purchase securities, this means that the account holder is obtaining a loan from brokerage firm where the account is held and using the money from the loan to invest in more securities than you can buy with your available cash. If the securities decline in value, the account holder must repay the loan resulting in amplified losses.

Options Trading Risk. These risks include, but are not limited to, volatile movements in the price of the underlying instrument and misjudgments as to the future prices of the options and/or the underlying instrument. Increased option volatility can increase both the profit potential and the risk of trading. While volatility can be monitored and reacted to, there is no cost-effective means of hedging against market volatility. Selling options creates additional risks. The seller of a “naked” call option (or the seller of a put option who has a short position in the underlying instrument) is subject to the risk of a rise in the price in the underlying instrument above the strike price, which risk is reduced only by the premium received for selling the option. In exchange for the proceeds received from selling the call option (in lieu of an outright short position), the option seller gives up (or will not participate in) all of the potential gain resulting from a decrease in the price of the underlying instrument below the strike price prior to expiration of the option.

Leverage. A small price movement in your favor can provide a high return on the deposit, however, a small price movement against you may result in significant losses. Your losses will never exceed the balance of your account, which is balanced to zero, if the losses are higher than the amount deposited. Such losses can occur quickly. The greater the leverage, the greater the risk. The size of leverage therefore partly determines the result of the investment.

MATERIAL RISKS OF SECURITIES

One of the main risks in using fundamental analysis is that while the overall strength and competitiveness of a company may be good, market conditions may negatively impact the security. Investing in securities involves the risk of loss. Clients should be prepared to bear potential loss.

SYM primarily utilizes open ended funds (such as mutual funds or exchange-trade funds) whose portfolios are invested in equity and fixed income securities.

Mutual Funds and Exchange-Traded Funds (“ETFs”). An investment in a mutual fund or ETF involves risk, including the loss of principal. Mutual fund and ETF shareholders are necessarily subject to the risks stemming from the individual issuers of the fund’s underlying portfolio securities. Such shareholders are also liable for taxes on any fund-level capital gains, as mutual funds and ETFs are required by law to distribute capital gains in the event they sell securities for a profit that cannot be offset by a corresponding loss.

Shares of mutual funds are generally distributed and redeemed on an ongoing basis by the fund itself or a broker acting on its behalf. The trading price at which a share is transacted is equal to a fund’s stated daily per share net asset value (“NAV”), plus any shareholders fees (e.g., sales loads, purchase fees, redemption fees). The per-share-NAV of a mutual fund is calculated at the end of each business day, although the actual NAV fluctuates with intraday changes to the market value of the fund’s holdings.

Shares of ETFs are listed on securities exchanges and transacted at negotiated prices in the secondary market. Generally, ETF shares trade at or near their most recent NAV, which is generally calculated at least once daily for indexed-based ETFs and more frequently for actively managed ETFs. However, certain inefficiencies may cause the shares to trade at a premium or discount to their pro rata NAV. There is also no guarantee that an active secondary market for such shares will develop or continue to exist. Generally, an ETF only redeems shares when aggregated as creation units (usually 50,000 shares or more). Therefore, if a liquid secondary market ceases to exist for shares of a particular ETF, a shareholder may have no way to dispose of such shares.

SYM may utilize leveraged and inverse ETFs and ETNs whose returns are based on a positive or negative multiple of the performance of the underlying index. Leveraged and inverse ETFs and ETNs pursue a range of investment strategies through the use of swaps, futures contracts, and other derivative instruments, which also carry high levels of risk. The principal risks associated with investing in leveraged and inverse ETFs and ETNs include compounding risk, derivative securities risk, correlation risk and short sale exposure risk.

Risks Related to Equity Investments.

Regardless of any one company’s particular prospects, a declining stock market may produce a decline in prices for all equity securities, which could also result in losses.

In addition to common stocks, the equity securities in a portfolio may include preferred stocks, convertible preferred stocks, convertible bonds, and warrants. Like common stocks, the value of these equity securities may fluctuate in response to many factors, including the activities of the issuer, general market and economic conditions, interest rates, and specific industry changes. Convertible securities entitle the holder to receive interest payments or a dividend preference until the security matures, is redeemed, or the conversion feature is exercised. As a result of the conversion feature, the interest rate or dividend preference is generally less than if the securities were non-convertible. Warrants entitle the holder to purchase equity securities at specific prices for a certain period of time. The prices do not necessarily move parallel to the prices of the underlying securities and the warrants have no voting rights, receive no dividends, and have no rights with respect to the assets of the issuer.

Competition. Equity securities selected by SYM for its portfolios typically have significant market competitors and there is no guarantee that a portfolio security will perform better than its competitors and could be subject to risks competing with other companies with regard to product lines, technology advancements and/or management styles of the competing companies.

Risks related to Fixed Income Securities

Fixed Income securities are subject to the risk of an issuer's ability to meet principal and interest payments on the obligation (credit risk), and may also be subject to price volatility due to such factors as interest rate sensitivity, market perception of the creditworthiness of the issuer and general market liquidity (market risk). The market values of fixed income securities tend to vary inversely with the level of interest rates. When economic conditions appear to be deteriorating, medium to lower rated securities may decline in value due to heightened concern over credit quality, regardless of prevailing interest rates.

Credit Risk. Credit risk is the risk that the issuer or guarantor of a debt security or counterparty to the portfolio's transactions will be unable or unwilling to make timely principal and/or interest payments, or otherwise will be unable or unwilling to honor its financial obligations. If the issuer, guarantor, or counterparty fails to pay interest, the portfolio's income may be reduced. If the issuer, guarantor, or counterparty fails to repay principal, the value of that security and value of portfolio may be reduced.

Interest Rate Risk. Interest rate risk is the possibility that bond prices overall will decline over short or even long periods because of rising interest rates.

Municipal Securities. Investments may be made in municipal securities. Municipal securities consist of debt obligations issued by state and local governments, or by public authorities, to obtain funds to be used for various public facilities, for refunding outstanding obligations, for general operating expenses and for lending such funds to other public institutions and facilities. These funds may also be used for certain private activity and industrial development bonds issued by, or on behalf of, public authorities to obtain funds for the construction, equipment, repair or improvement of privately-operated facilities. General debt obligation bonds are backed by the taxing power of the issuing municipality. Revenue obligations are backed by the revenue of a project or facility, for example, tolls from a toll bridge. Certificates of participation represent an interest in an underlying obligation or commitment such as an obligation issued in connection with a leasing arrangement. The payment of principal and interest on private activity and industrial development obligations generally depends solely on the revenues generated by the use of the specified facilities. Some municipal bonds may be insured by commercial insurance policies which are meant to pay principal and interest payments to bondholders in the event that the issuer defaults. However, the insurance is not a guarantee against loss and depends upon the creditworthiness of both the insurer and the issuer. Prices and yields on municipal bonds are dependent on a variety of factors, such as the financial condition of the issuer, general conditions of the municipal bond market, the size of a particular offering, the maturity of the obligation, and the rating of the issue.

Rating Agencies. Ratings assigned by Moody's and/or S&P and/or Fitch to securities acquired in a portfolio reflect only the views of those agencies. Explanations of the significance of ratings should be obtained from Moody's, S&P and Fitch. No assurance can be given that ratings assigned will not be withdrawn or revised downward if, in the view of Moody's, S&P or Fitch, circumstances so warrant.

Risks related to Investments Private Investment Vehicles

Use of Private Collective Investment Vehicles. SYM recommends that certain clients invest in privately placed collective investment vehicles (e.g., hedge funds, private equity funds, etc.). SYM does not directly manage these vehicles; these investment vehicles retain their own managers who make the investment decisions and underlying security selections for the vehicle. The managers of these vehicles have broad discretion in selecting the investments. Typically, there are few limitations on the types of securities or other financial instruments which may be traded or used, and no requirement to diversify. Some types of these investment vehicles may trade on margin or otherwise leverage positions, thereby potentially increasing the risk to the vehicle. In addition, because private investment vehicles are not registered investment companies, they are not subject to the same regulatory reporting and oversight of a registered entity. There are numerous risks in investing in these types of securities. Clients should consult each investment's private placement memorandum and/or other prospectus or documents explaining such risks prior to investing.

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 an alternative to traditional trust service providers, and SYM Financial Corporation intends to refer clients to NATC for trust services, where appropriate.

Krugger Lawton and Company: In the beginning of 2001, SYM Financial Corporation announced a strategic alliance with Krugger Lawton and Company, an accounting firm. The Krugger/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 Krugger Lawton and Company will have immediate access to the full scope of services provided by SYM, and the clients of SYM will likewise have access to the accounting services provided by Krugger Lawton and Company.

SYM Financial Corporation and Krugger Lawton and Company will remain completely separate and independent organizations. This strategic alliance provides the ability for SYM and Krugger Lawton to increase the scope of services offered to their respective existing clients. This agreement is in no way intended to prohibit either Krugger 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 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 client referrals to SYM;
- 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; 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 honesty, loyalty, prudence, 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. Our Code of Ethics also requires the prior approval of acquisition of certain securities in order to mitigate risk of potential conflicts with client accounts. SYM also requires:

- 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; and
- we periodically monitor these outside employment activities to verify that any conflicts of interest continue to be properly addressed by our firm.

Our Code of Ethics also provides for oversight, enforcement and recordkeeping provisions.

SYM Financial Corporation's Code of Ethics further includes the firm's policy prohibiting the use of material non-public information. A copy of our Code of Ethics is available to our advisory clients and prospective clients. You may request a copy by emailing info@sym.com, or by calling us at 574-267-2300.

Item 12 Brokerage Practices

SYM's objective in selecting broker-dealers and in effecting portfolio transactions is to seek to obtain the best combination of price and execution with respect to its accounts' portfolio transactions. The best net price, brokerage commissions, spreads and other costs, are normally important factors in the decision-making process, but a number of other factors are also considered as they are deemed relevant. In applying these factors, SYM Financial Corporation recognizes that different broker-dealers may have different execution capabilities with respect to different types of securities.

Unless otherwise directed by the Client, SYM will utilize the brokerage services of the custodian where the client account is held. Commissions or transaction charges will vary depending on which custodian's brokerage services are used and may not be the lowest available.

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's interest in receiving future referrals.

SYM Financial Corporation generally recommends 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:

- provide access to client account data (such as trade confirmations and account statements);
- facilitate trade execution and allocate aggregated trade orders for multiple client accounts;
- provide research, pricing and other market data;
- facilitate payment of our fees from clients' accounts; and
- 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:
 - publications and conferences on practice management and business succession; and
 - access to employee benefits providers and human capital consultants.

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.

While SYM generally recommends Schwab for brokerage services for client accounts, SYM will accept direction from a client as to which broker is to be used for a client account. If the client directs the use of a particular broker-dealer, the client should be aware that SYM might be able to obtain a more favorable commission cost from another broker-dealer in particular transactions. As a result, the client may pay higher commissions or other transaction costs on transactions for the account than would otherwise be the case if SYM selected the broker-dealer based on best execution. Consequently, execution may not be achieved.

Trade Aggregation and Allocation

SYM generally trades client accounts on an individual basis (i.e., not blocked). SYM primarily transacts in open-end mutual funds which are unable to be blocked. If the client account uses ETF investments in lieu of similar strategy mutual fund

investments, SYM may still trade the account on an individual basis due the affected accounts being held at various custodians or other factors. As mentioned above, the custodian where the account is held will usually determine which broker will be used. Whether SYM is trading on an individual basis or aggregating trades, SYM manages client accounts within their respective strategies, given account restrictions and/or constraints and implements trade rotation procedures to ensure that no accounts take preference over other accounts.

On occasion, SYM Financial Corporation may block client trades. In making investment decisions for the accounts, securities considered for investment by one account may also be appropriate for another account managed by SYM Financial Corporation. On occasions when the purchase or sale of a security is deemed to be in the best interest of more than one account, SYM Financial Corporation may, but is not required to, aggregate or block orders for the purchase or sale of securities for all such accounts to the extent consistent with best execution and the terms of the relevant investment advisory agreements. Such combined or “blocked” trades may be used to facilitate best execution, including negotiating more favorable prices, obtaining more timely or equitable execution or reducing overall commission charges.

Aggregation of transactions will occur only when SYM Financial Corporation believes that such aggregation is consistent with SYM Financial Corporation’s duty to seek best execution and best price for clients and is consistent with SYM Financial Corporation’s investment advisory agreement with each client for which trades are being aggregated. Client accounts with certain restrictions and directed brokerage clients may be unable to participate in blocked transactions. SYM Financial Corporation generally will not aggregate trades for clients that may have limited SYM Financial Corporation’s brokerage discretion or other client accounts that it manages to the extent that those clients have directed their trading to a particular broker-dealer. Orders for such clients will generally be aggregated only with similar clients and allocated in the same manner as described above. The same manual process described above will be implemented for these accounts if random allocation would result in a partial fill for the last account selected. SYM Financial Corporation may include proprietary accounts in such aggregate trades subject to its duty of seeking best execution and to its Code of Ethics.

Item 13 Review of Accounts

PORTFOLIO MANAGEMENT AND WEALTH MANAGEMENT CONSULTING SERVICES

While the underlying securities within 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. If a client only receives Wealth Management Services, those accounts may be reviewed less frequently than quarterly.

These accounts are reviewed by the Financial Advisor assigned to the particular client. Such reviews are also supported by SYM’s Client Service Team.

In addition to the statements and confirmations of transactions that clients receive from their custodian, we provide quarterly reports summarizing account performance, balances and holdings.

QUALIFIED PLAN CONSULTING SERVICES

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 periodically review the investment options of the plan. These accounts are reviewed by the SYM Investment Committee, as well as the Financial Advisor assigned to the particular client. Such reviews are also supported by SYM’s Client Service Team. In addition, investment reviews will be held at the frequency agreed upon time intervals established by the plan sponsor.

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

FINANCIAL PLANNING PROJECTS

While reviews may occur at different stages depending on the nature and terms of the specific engagement, typically no ongoing formal reviews will be conducted for Financial Planning Project clients unless otherwise specifically outlined in the engagement. 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 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.

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

SYM does 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.

Item 18 Financial Information

Under no circumstances do we require or solicit payment of fees in excess of \$1,200 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.