



MONTEBELLO PARTNERS, LLC

ADVISER BROCHURE

75 Montebello Road
Suffern, New York 10901
Telephone (845) 875-6500
Facsimile (845) 357-4741

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This brochure provides information about the qualifications and business practices of Montebello Partners, LLC. If you have any questions about the contents of this brochure, please contact us at (845) 875-6502 or compliance@mjbc.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. The use of the term "Registered Investment Advisor" does not imply a certain level of skill or training. Additional information about Montebello Partners, LLC also is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 - Material Changes

Pursuant to SEC Rules, Montebello Partners LLC (“MPLLC”) BAM will ensure that you receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of the business’ fiscal year. MPLLC may further provide other ongoing disclosure information about material changes as necessary.

BAM will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge. Currently, our Brochure may be requested by contacting BAM at (845) 875-6500 or compliance@mjbc.com Additional information about

BAM is available via the SEC’s website, www.sec.gov. The SEC’s website also provides information about any persons affiliated with MPLLC who are registered, or are required to be registered, as investment adviser representatives of MPLLC.

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Item 4 - Advisory Business

A. Firm Description/Principal Owner

Montebello Partners, LLC (“MPLLC” or “Montebello”) is a New York state registered Investment Adviser providing advice to Registered Investment Advisory Firms and their representatives, Family Offices, and Broker Dealers and their representatives. MPLLC is a Delaware Limited Liability Company founded in 2008. The sole owner is Bruderman & Co., LLC.

B. Types of Advisory Services

Third Party Investment Adviser. The Adviser will actively manage portfolios on behalf of broker dealers and registered investment advisers through the institutional wealth services platform of Pershing, LLC.

C. Tailored Relationships

MPLLC may tailor advisory services to the needs of the broker dealers or registered investment advisory firms.

D. Wrap Fee Programs

MPLLC does not offer Wrap Fee Programs.

E. Assets Under Management

MPLLC currently has no assets under management.

Item 5 - Fees and Compensation

A. Investment Fund Management

None at this time.

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

MPLLC does not charge performance-based fees and does not participate in side-by-side management.

Item 7 – Types of Clients

The Adviser has no clients at this time.

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

MPLLC anticipates implementing the following.

Long-term purchases: The portfolios strategies offered by MPLLC are designed for long-term investment with an investment horizon of no less than five (5) years and at least a ‘moderate’ risk tolerance.

Portfolio turnover and short-term purchases: Based on the rules applied to the underlying index which the strategy is designed to emulate, investors may be subject to higher levels of portfolio turnover and trading costs, potentially exposing the investor to short-term capital gains.

Risk of Loss: Securities investments are not guaranteed, and the client may lose money on investments. The client should be prepared to bear those losses. Montebello asks that the client work with Montebello to help Montebello understand the client's tolerance for risk.

Item 9 – Disciplinary Information

Montebello is required to disclose any legal or disciplinary events that are material to a client’s or prospective client’s evaluation of the Advisor’s advisory business or the integrity of the Adviser’s management.

Montebello and its management personnel have no reportable disciplinary events to disclose.

Item 10 – Other Financial Industry Activities and Affiliations

Montebello’s sole owner, Bruderman & Co., LLC, is the sole owner of affiliate Bruderman Asset Management, LLC, an SEC Registered Investment Advisory firm (BAM). BAM is the sole owner of Bruderman Brothers, LLC, Member FINRA and SIPC (BLLC).

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

Montebello has adopted a Code of Ethics expressing the firm’s commitment to ethical conduct. Montebello’s Code of Ethics describes the firm’s fiduciary duties and responsibilities to clients, and sets forth Montebello’s practice of supervising the personal securities transactions of supervised

persons with access to client information. Individuals associated with Montebello may buy or sell securities for their personal accounts identical to or different than those recommended to clients. It is expressed policy of Montebello that no person employed by the firm shall prefer his or her own interest to that of an advisory client or make personal investment decisions based on the investment decisions of advisory clients.

To supervise compliance with its Code of Ethics, Montebello requires that individuals associated with our firm who have access to non-public information regarding advisory recommendations or transactions to advisory client accounts provide annual securities holdings reports and monthly statements (or quarterly, if no monthly statement is generated) to the firm's Chief Compliance Officer. Montebello requires such access persons to also receive approval from the Chief Compliance Officer prior to investing in any IPO's or private placements (limited offerings).

Montebello requires that all individuals act in accordance with all applicable Federal securities laws. Montebello's Code of Ethics further includes the firm's policy prohibiting the use of material non-public information. Any individual not in observance of the above may be subject to discipline. Montebello will provide a complete copy of its Code of Ethics to any client upon written request to the Chief Compliance Officer at Montebello's principal address.

Item 12 – Brokerage Practices

1. Factors that Montebello considers in selecting or recommending broker-dealers for client transactions and determining the reasonableness of their compensation (e.g., commissions).
2. Research and other Soft Dollar Benefits. Montebello does not have any soft-dollar arrangements and does not receive any soft-dollar benefits.
3. Brokerage for Client Referrals. Montebello does not receive client referrals from broker/dealers.
4. Directed Brokerage.
 - a. Montebello does not recommend, request, or require that a client direct it to execute transactions through a specified broker-dealer.
 - b. Montebello does not permit a client to direct brokerage.
5. Aggregation for client accounts. Montebello reserves the right to aggregate trades for client accounts.

Item 13 – Review of Accounts

Montebello currently has no accounts.

Item 14 – Client Referrals and Other Compensation.

Generally it is Montebello's policy not to engage solicitors or pay related or non-related persons for referring potential clients to the firm.

It is Montebello'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 provided by Montebello.

Item 15 – Custody

Montebello does not take custody of client's funds and it therefore does not issue accounts statements, although it may generate some account documentation for use at client meetings. Clients should receive account statements from the qualified custodian that holds and maintains client's investment assets on at least a quarterly basis. Montebello urges clients to carefully review these statements.

Item 16 – Investment Discretion

Montebello, in its sole discretion, has the authority to determine; (1) the securities to be bought or sold, (2) the amount of securities to be bought or sold, and (3) the broker or dealer to be used.

Montebello may, but shall not be obligated to, aggregate orders for advisory accounts with orders for other advisory accounts or clients. Montebello will allocate securities so purchased or sold, as well as the expense incurred in the transaction, in a manner that it considers to be so equitable and consistent with its fiduciary obligations to clients. Montebello will assign accounts the average price resulting from such aggregated trades.

Item 17 – Voting Client Securities

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

of the assets, to forward to the client copies of all proxies and shareholder communications relating to the client's investment assets.

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

Item 18 – Financial Information

Montebello does not require or solicit prepayment of more than \$1,200.00 in fees per client, six months or more in advance. Montebello has never been the subject of a bankruptcy petition.

Item 19 - Requirements for State-Registered Advisers

- A. The identity, formal education, and business background of each of the firm's principal executive officers and management persons are contained in Form ADV 2B.
- B. The firm is not engaged in any business other than giving investment advice.
- C. Supervised persons in the firm are not compensated for advisory services with performance-based fees.
- D. Neither the firm nor management persons were involved in one of the events listed below.
 - 1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
 - (a) an investment or an investment-related business or activity;
 - (b) fraud, false statement(s), or omissions;
 - (c) theft, embezzlement, or other wrongful taking of property;
 - (d) bribery, forgery, counterfeiting, or extortion; or
 - (e) dishonest, unfair, or unethical practices.
 - 2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
 - (a) an investment or an investment-related business or activity;
 - (b) fraud, false statement(s), or omissions;
 - (c) theft, embezzlement, or other wrongful taking of property;
 - (d) bribery, forgery, counterfeiting, or extortion; or
 - (e) dishonest, unfair, or unethical practices.
- E. In addition to any relationship or arrangement described in response to Item 10.C. of Part 2A, the firm has no relationship or arrangement that with any issuer of securities that is not listed in Item 10.C. of Part 2A.